

INDEPENDENT EVALUATION REPORT

LEB/98/R71

Support on the National Anti-Corruption strategy

Anti Corruption

Lebanon

Independent evaluation Report

Local Consultant

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UNITED NATIONS OFFICE ON DRUGS AND CRIME

Vienna- Feb 2005

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LIST OF ACRONYMS AND ABBREVIATIONS

CICP	Center for International Crime Prevention
HQ	Head Quarters
MoEd	Ministry of Education
MoYS	Ministry of Youth and Sports
NGO	Non- Governmental Organization
NIM	National Integrity Meeting
NISC	National Integrity Steering Committee
OMSAR	Office of Minister of State for Administrative Reform
TOR	Terms Of Reference
UNDP	United Nations Development program
UNICRI	United Nations International Crime and Justice Research Institute
UNODC	United Nation Office on Drugs and Crime

EXPLANATORY NOTE

The name and structure of UNODC has changed several times during the course of the evaluated technical assistance projects; at the start, the centre operated under the label "Centre for International Crime Prevention" (CICP); during the project this label changed into CICP/ODCCP, specifying that this Center's activities were part of the United Nations Office for Drug Control and Crime Prevention (ODCCP); since 2002 this name was again changed into the current name. "United Nations Office on Drugs and Crime" (UNODC). For the legibility of the present report we will be using the current name, UNODC, throughout the text.

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Executive Summary

Findings : Identified Problems/Issues	Supporting Evidence	Recommendations
This project design was set by UNODC/UNICRI where OMSAR was not included. This then caused some conflicts in implementation and ownership of outputs.	The outputs of the Project (mainly those of the second phase) including the cooperation with NISC and the use of the country assessment report were not endorsed by the government at later stages	For implementing supportive projects to the Lebanese government, it is essential to follow a participatory process that includes not only the simple governmental approval and endorsement of the project design but also its active participation during the design period.
The political situation in Lebanon was not ready to accept fighting corruption in this manner.	The country assessment hindered the continuation of the Anti-Corruption process and the NISC was excluded where the governmental was not ready anymore to cooperate with it.	Political turmoil and the consequent effects on such a project dealing with high visible and close political mandate should not be underestimated. Further diagnosis of the political environment could have helped avoiding many of the project constraints
This was a high profile and sensitive project that would affect the whole Lebanese governments and societies.	In this project, despite the fact that OMSAR is officially the project focal point; there has been a significant confusion in roles and responsibilities especially in light of NISC creation.	A clear definition of roles and responsibilities for the different actors is preferred. More precisely, and without disregarding the need for active participation of the different actors, the project management should focus the implementation of the project activities in cooperation with the actual focal point.
Producing the country assessment report turned to be the main activity that labeled the whole project.	Failure in the implementation of this activity eventually meant a project failure. After all, the ultimate goal of the project was to set the bases for fighting corruption in Lebanon and not producing the report itself.	A project affected by ongoing political changes, should not be dependent on one single activity.

<p>The project was integrated and there was participation of all the affected institutions. In phase II, There are two institutions that are basically OMSAR and NISC. However there were interlinked with no separate and exact roles for each. As for the third phase stakeholders included MoEd, MoYS, schools, and others</p>	<p>Even though the relation between OMSAR and NISC was not preferable anymore from both parties due to the arisen conflicts, there was successful cooperation and full and exact distribution of roles and activities on the third phase.</p>	<p>Participation of different actors in implementation is extremely important however is not easy at all. A careful design and special attention should be given to ensure not only the active but also the positive participation of all actors involved. It is important to have a more comprehensive consensus building process to make sure that national partner collaborative potentials will not change into needless hostile positions.</p>
<p>The outputs of phases were not linked and used interlinked between the two phases</p>	<p>The outcomes and recommendations from the workshop in phase I were not taken into consideration and does not show in phases II and III. In phase III, The country assessment report from phase II and the NISC were not benefited from.</p>	<p>To build up on the work and objectives achieved and follow up the activities which were implemented successfully, with supporting projects.</p>
<p>Educational materials, activities targeting youth were highly interesting for all the stakeholders</p>	<p>These activities are the activities that has put the project back in track after the hectic politicized and problematic period during the country assessment report</p>	<p>Educational materials, activities targeting youth and academic curriculum should be highly supported in collaboration with governmental institutions as well as international organizations since it has a positive direct impact on anti corruption process and build-up supportive campaign.</p>
<p>There were delays in the implementation of the project activities.</p>	<p>In the project, there was no specific personnel for the implementation of the third project after the departure of the project coordinator</p>	<p>For effective and proper implementation of projects especially those dealing with sensitive issues, it is important to have specific personal for each project.</p>

CONCISE SUMMARY

INTRODUCTION

In the end of the 1990s, the UNODC declared the Anti- Corruption program focusing on the Middle East. The Lebanese government requested to be model and a regional pilot country of the Middle East. As such, a technical assistant project (LEB/98/R71) entitled “Support to the National anti-corruption strategy plan in Lebanon” was designed in collaboration with UNODC and UNICRI. This proposal was developed during a period of a major change in the political situation in 1998 and it stretched till the end of 2005.

This evaluation report is an attempt to assess the project in its implemented activities of phases II and III. The evaluation will state clearly the main lessons learned, major obstacles, as well as several recommendations to follow-up on activities.

EVALUATION METHODOLOGY

The Evaluation was executed by a local consultant with a supporting team. The assessment was pursued first by a briefing about the project with relevant personnel. In addition to that, a desk research and interviews were executed and data analyses were applied.

PROJECT CONCEPT

The effort from UNODC and with cooperation with UNICRI to assist the Lebanese government to adopt a strategy for Anti-Corruption and an action plan that will be disseminated was a sound participatory approach for all public and private sectors in the society, donors and international agencies. Moreover, the concept was very important in having a direct impact on youth’s behaviors against corruption (Phase III).

Political turmoil and the consequent effects on such a project dealing with high visible and close political mandate were relatively underestimated. Further diagnosis of the political environment could have helped avoiding many of the project constraints.

PROJECT DESIGN AND IMPLEMENTATION

Phase II and Phase III of the project were set each with its own objectives. They were designed in a way where all activities and inputs were based on involving the Lebanese government represented by OMSAR as it was the main recipient for the UN efforts in assisting Lebanon to build up a strategy against corruption.

The design was structured, holistic, and has well identified goals and action plan, a design where all partners have the opportunity to be active and effective in the project implementation. But there was also ambiguity of some activities leading to obstacles in implementation.

PHASE II

COUNTRY ASSESSMENT REPORT

The Country Assessment Report was the corner stone of the project; it includes all the basic information to build up most of the other objectives. The report as implemented

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looked as an ultimate end in fighting corruption and not as a necessary step to start a continuous process. The design of this country assessment report would have been more constructive, acceptable, and endorsed if it has a mechanism to tackle major sectors that are corrupted in Lebanon and it tackles corruption issues in a sequence of time with an awareness campaign prior to the publication of the country assessment report.

Since the ultimate goal of the report was to benefit from these cases and not to publicize the people involved in them as identified by the consultant, avoidance of mentioning names would have been preferred. However, the Consultant gathered substantive information that should be taken into consideration in any future study.

NISC, ANTI-CORRUPTION ACTION PLAN, & NATIONAL INTEGRITY STRATEGY

The council of ministers decision for NISC establishment as well as the project design does not state its structure, duration, legalization, funding, role and host. Forming the committee through a Government decision meant a high political level, contributed to politicizing of outputs. As expected, confusion occurred among partners in the project due to a newly formed and completely independent setup without a higher authority to report to with no jurisdictions.

NISC position on the Country Assessment Report confused roles and responsibilities of different project actors. To this end, regardless whether NISC approval of the Country Report was mandatory or not, it is obvious that the many objections of NISC on the report and the UNODC and the consultant decision to publicize it anyway have contributed to blocking the implementation, in the same track, the other project activities.

SETTING AN EXPERTS' MEETING

The experts meeting was to present the country assessment by the consultant and preliminary strategy and the website by the NISC. The major objections from the OMSAR and NISC not to disseminate the report in the meeting were omitted by UNODC and consultant. But, UNODC considered that the consultant “sheeted” by presenting names.

The lack of participation of the government shows the self interest of the contractor in the output itself and in the turning wheel of the project more than its continuation. On the other hand, queries and uncertainties rise about the assessment report, its trust, affiliations, and the reputation of the influence of the intelligence services and the current political regime in the country against the passed one.

PHASE III

Unlike Phase II, in this phase (Phase III), it was notices that OMSAR was the main body that was selecting the national experts and consultants and then recruited by UNODC.

All activities in this phase were perfectly covered by the media and have had national acceptance. Due to the experimental approach, it was flexible to change the project design easily and added to the success of the project in its implementation. However, they were not set on time due to outside factors and a delay in budget from UNODC HQ.

CODE OF CITIZENSHIP FOR YOUTH AND SOCIO-PEDOLOGICAL TRAINING MATERIALS

There was full cooperation between the technical committee that prepared the code and the representative of UNODC in implementing these activities. Moreover, the government was cooperative however red tape led to some delays during the process.

The work of the committee in these documents showed ethical and professional behaviors. In general, this activity was considered successful. It was also effective and sustainable due to its endorsement and acceptance from the different partners.

TEACHERS MANUAL AGAINST CORRUPTION

Even though it was not mentioned in the project design, this activity helped positively in the improvement and more efficient implementation of the strategy.

In 2004, the project faced some delays due to management problem in UNODC, and due to the political situation in Lebanon where a new government was formed. However, flexibility in the process and the understanding of the coordinating personnel as well as their care for the public interest has led to outstanding results in these activities.

ADOLESCENCE'S PERCEPTION OF CORRUPTION

This activity was implanted. It focused on increasing adherence of youth to the rule of law through the launching of awareness raising activities. This was a successful design for having a direct impact on target groups as well as raising awareness among them.

IMPACTS AND SUSTAINABILITY

It is worth mentioning that the negative impact of the Anti corruption project did not affect in any way the other main project conducted by UNODC office in Lebanon (Juvenile Justice) and the importance of the positive intervention of the UNODC office in Lebanon as mentioned by national stakeholders.

The impact of phase II of the project was negative and not as desired during the project design. Regardless whether the accusations against the Country Report were just or not, it is clear that more constructive approaches could have been used to lead to more credible outcomes.

The outputs of phase III are considered to be essential and promising in being the first youth documents for combating corruption and it played a part in increasing the knowledge and awareness of students and teachers alike in pilot schools. However, summative evaluation can not be made yet.

The Youth Charter on Combating Corruption as a pilot went beyond its intended output to appeal to other NGO's in the Arab region. Hence, as a pilot project it did not only have its impact on Lebanon and succeeded as such in awareness but it crossed borders to other Arab region.

On the other hand, the awareness dimension of the project, which was further developed in the second phase, ensured that the sustainability of the project outputs will be attained through the grown interests of the public at large and the students in particular.

MAJOR LESSONS LEARNED & RECOMMENDATIONS

Drawing lessons from this project, designed to be a model project, is extremely important to avoid some of the potential pitfalls of similar anti-corruption projects in the future.

- Political turmoil and the consequent effects on such a project dealing with high visible and close political mandate should not be underestimated.
- A project of similar concept, especially affected by ongoing political changes, should not be dependent on one single activity.
- Participation of different actors in implementation is extremely important however is not easy at all. A careful design and special attention should be given to ensure not only the active but also the positive participation of all actors involved.

Major recommendations for future project implementation include:

- For implementing supportive projects to the Lebanese government, it is preferred to follow a participatory process that includes not only the simple governmental approval and endorsement of the project design but also its active participation during the design period.
- For effective and proper implementation of projects especially those dealing with sensitive issues, it is important to have specific personnel for each project.

1. INTRODUCTION

1.1 Background and context

1- Period of war and chaos in Lebanon that extended for more than 20 years has led to low institutional structures, low legislation enforcement, and low socio-ethical obligations and attitudes. This has directed to a wider site status of corruption and bribery. These factors, among others, have led to the spread of corruption and bribery in most governmental institutions as well as in lots of private and semi private sectors.

2- Since the end of Lebanon's war in 1990, the society has lived in a social and economical stress. After that era, the country was and still increasingly dependent on international funds and grants to finance the reconstruction and the rehabilitation process. Vast complains have been indicated about exaggerated and over rates costs of projects' implementation and wide complain from the judicial procedures and systems in Lebanon. This issue led donor agencies to ask the government to put serious efforts against corruption.

3- In the end of the 1990s, the UN (UNODC) declared the Anti- Corruption program focusing on the Middle East. In 1998, based on a request of Lebanese government under by former Prime Minister Mr. Saleem El Hoss , a technical assistant project (LEB/98/R71) entitled "Support to the National anti-corruption strategy plan in Lebanon" (budget \$305,551) was designed in collaboration with UNODC and UNICRI for Lebanon to be model and a regional pilot country for all the Middle East. This project was an endeavor to fight against corruption. After the Lebanese government decision number 36 dated 7/6/2000, the minister of OMSAR signed the project agreement. Moreover, OMSAR was set to be the national partner in the project.

4- During phase I of this project, the activities that have been held were an "Information Workshop" on 16, June 1999 about the "Role and Responsibilities of the Parliamentary Commissions in the Prevention and Fight Against Corruption". Another activity was held in November 1999, it was a governmental workshop about "corruption and its impact on administration, finance and economy". These activities have issued recommendations to follow in the later implementing stages of the project.

5- After that, revision of the project took place where the aim and the main objectives were set out in an agreement signed between both parties on 29/June 2000. These objectives are as follows:

- Analyze and document corruption through the completion of a country Assessment study
- Set a National strategy and an Anti- Corruption Action Plan
- Strengthen institutions and systems as well as enhance awareness to fight corruption through the implementation of the National integrity strategy and the Anti- Corruption Action Plan.

6- During the project and due to several obstacles and changes in political situation, a general orientation had taken place and objective three had shifted from practical and implementation role of awareness through strengthening institutional bodies to awareness materials for fostering the culture of legality among the youth. And therefore, the project has stretched from 1998 till end of 2005.

7- The project concept was developed during a period of a major change in the political situation in 1998. It was during that year when President Emile Lahhoud took seat and Prime Minister Rafic Harriri left the government. Mr. Harriri had been reiterated after the parliamentary elections in September 2000. This government had already have initiatives in fighting corruption. On its previous cabinet in 1996 where there was a convention on the “diligence concerning commitment to combat money laundry of illicit drug trafficking proceeds” and also a workshop on ways and means to combat corruption at the end of 1997. In the Hariri’s later governmental period, September 2000, the presence of UNODC was requested by Harriri himself.

8- Lately, the Lebanese government is preparing for the enrollment in the international protocol against corruption and issued on 15, December 2005 a government decision numbered 76. This decision gives minister of OMSAR the mandate to set a committee from the concerned ministries especially ministry of Justice to collect laws related to corruption to be amended in coherent with the provisions of the protocol.

1.2 Purpose and Objective of the evaluation

9- As per the TOR for this mission (Annex I), the general purpose of this evaluation report is to assess the project in its implemented stages, outputs, impact, and sustainability. This evaluation was undertaken through the phases that have been implemented which are phase II “starts on 29, June 2000) and phase III “5-march-2003 till end of 2005 including the revised activities. The assessment includes a comprehensive study and tackles through the report the following parameters:

- Project concept and design
- Project implementation
- Outputs
- Outcomes impact
- Sustainability of the project
- Lessons learned
- Recommendations and major finding

10- The evaluation will state clearly the main lessons learned from the project. It will record major obstacles faces through the process as well as several recommendations to follow-up on activities.

This evaluation would be a guiding tool for a better implementation of such projects in the future. The importance behind this assessment lies in the fact that its insights would perk up the project that has been set as regional pilot model for all the Middle East.

1.3 Evaluation methodology

11- The Evaluation was executed by a local consultant (Lawyer El Najjar, Raed) with a supportive team (Abou Mosleh, Rania & El Jurdi, Shirine). The team work mobilized on its knowledge in judicial and social aspects related to criminal justice reform, previous experience in legal consultations, assessments, and reporting. (Annex I: TOR of the consultant).

12- The steps that were pursued in the flow of the evaluation procedure are:

- A briefing with the officer in charge and the governmental focal point of the project.
- Copy of all documents pertained to the project
- Documents made available with a request from the evaluator
- Desk review for all relevant documents available;
- Interviews with key stakeholders including (Annex II: List of Interviewers)
 - Previous Minister of OMSAR (currently member in the parliament)
 - UNODC (officer in charge & X-project coordinator)
 - NISC members
 - Project focal point at OMSAR
 - Consultant contracted by UNICRI (for the Country Assessment Report)
 - Consultants of phase III that worked on the youth charter and educational materials.

13- The selection of the interviewed individuals was based on their role and mandate related to the project implementation depending on the level of their involvement. However, the names selected for interviews were through a common decision between OMSAR and the officer in charge of the project. The later set for the interviews and followed up execution.

2. PROJECT CONCEPT

14- Since UNODC launched the Global Program Against Corruption (GPAC) in 1999, it has been focusing on four main areas.

1. Providing technical assistance to member states in strengthening their legal and institutional anti-corruption framework
2. Strengthen Judicial integrity
3. Developing and dissemination of anti-corruption strategies; and
4. Enhancing interagency anticorruption coordination

15- In this context, the project came with a main aim to get the government interested in combating corruption. It was with the help of concerned UN agencies and in a direct effort and orientation from UNODC and with cooperation with UNICRI.

16- The approach that the project has been planned is sound. It is a UN effort to assist the Lebanese government to adopt a strategy for Anti-Corruption and an action plan that will be disseminated to governmental, non governmental, academic institutions as well as to donors. The government has assigned OMSAR as the main body that is responsible for executing the project.

17- The concept was a participatory approach for all public and private sectors in the society, donors and international agencies. Moreover, the concept was very important in targeting youth to fight against corruption (Phase III).

18- From a political point of view, the project concept passed in two stages. In stage one, between 1998 and September 2000, the government, which was after the presidential elections ruled by former Prime Minister Mr. Saleem El Hoss, adopted the slogan of Anti corruption and worked in coherence with the presidents' policy. In the second stage of the implementation, after the parliamentary elections in September 2000, when H.E. Mr. Harrir came back as a prime minister, key persons interviewed during the preparation of this report like minister of OMSAR Mr. Fouad El Saad considered that the slogan was used as a tool against Harrir's previous ruling era i.e. before the election of president Lahoud.

19- Throughout the project, the government's will to fight corruption was expressed clearly. It was an intention to fight corruption however vision and means for fighting where not translated seriously. Moreover, going with this trend, anti-corruption, from the president and the government was more of a political decision and not a strategic decision.

3. PROJECT DESIGN AND IMPLEMENTATION

20- The project design was set by UNODC and UNICRI. After the project's preliminary phase (Phase I), it has been designed in two phases (Phase II and Phase III) each with its own set of objectives where all activities and inputs are set through the direct cooperation of Lebanese government represented by OMSAR in the organization and the implementation of the project activities. OMSAR was the main recipient for the UN efforts in assisting Lebanon to build up a strategy against corruption. As per the scope of work of this evaluation, this report will only assess phases II and III.

21- In phase II, the design included several implementation stages that were divided into 4 separate objectives that must lead progressively to sequential outputs. The objectives of this phase are:

- **Objective 1:** Analysis and documentation of the extent of corruption in Lebanon through the completion of a Country Assessment Report
- **Objective 2:** Set a national integrity strategy and an Anti-Corruption Action plan through the establishment of a consensus among a broad group of stakeholders.
- **Objective 3:** Strengthening institutions and systems and enhance awareness to fight corruption through the implementation of a national integrity strategy and an Anti corruption action plan.
- **Objective 4:** Improved accountability of all stakeholders in the Anti-Corruption Programme through the completion of an up-dated country Assessment and a second national Integrity Meeting (NIM2).

22- However, UNODC implemented the activities of objective one and part of objective two at the same time. This had been a step to assure the realization of both objectives on time as well as to insure the participation and input of National Integrity Steering Committee in the process. However, this led to some confusion in roles and responsibilities of project actors (Explained later: role of National Integrity Steering Committee-NISC).

23- In phase III, after the conflict and the inability in the continuity of the project as designed due to the impact of the country assessment report, UNODC in close coordination with OMSAR and the donors changed the orientation in the field of anti corruption strategies to new activities under the same framework of the initial project. This phase started in May 2002 and had the following objectives:

Objective 1: A code of citizenship for youth and socio- pedagogical training material will be developed to enhance awareness among adolescents to fight corruption.

Objective 2: Increased adherence of youth to the rule of law through the launching of awareness raising activities.

24- This phase was properly implemented and as designed due to the absence of any political connotation or stress. The target groups are youth where all partners have welcomed this initiative. This phase was well designed in terms of set objectives and timeframe.

25- In general, the design was structured, holistic, and has well identified goals and action plan, a design where all partners have the opportunity to be active and effective in the project implementation.

This evaluation report presents the assessment of the implemented stages separately.

3.1 Phase II - Objective 1

26- Under this objective, analysis and documentation of the extent of corruption in Lebanon through the completion of a Country Assessment Report will be carried on. The Country Assessment Report is the main output.

3.1.1 General design and implementation of Objective 1 (phase II)

The country assessment report is the corner stone of the project; it includes all the basic information to build up most of the other objectives.

Design

27- In the project design, a country assessment report of the extent, level, distribution, causes and nature of corruption will be prepared by a consultant contracted by UNICRI. It included desk reviews, case studies, focus groups and evaluation meetings. The design as mentioned and planned does not reflect that the report is a preliminary study. The

report looked as if an ultimate end in fighting corruption and not as a necessary step to start a continuous process.

28- Moreover, it should have clearly stated that the outputs should be built on the previous actions and recommendations that have been set in a prior stage in the same project i.e. the workshop done by the parliament and the government in June 1999.

29- The design would have been more constructive, acceptable, and endorsed if it has a mechanism to tackle major sectors that are corrupted in Lebanon and corruption issues in a sequence of time with an awareness campaign prior to the publication of the country assessment report. Effective mechanisms in fighting corruption as well as the needed institutional and legal setup, political and financial power needed for keeping up this mechanism on track would have been preferred. The responsibility of OMSAR is questionable in relation to political situations as stated in sections “Background and project concept”.

30- On the other hand and after revising the design and the interviews, it was clear that the time for implementation of these activities as designed and the budget were not coherent with the expected outputs of the country assessment report. There was a wide gap between activities, objective and quantitative side of time duration and number of pages of the report.

Implementation

31- The contract for implementing outputs of phase II was through contracting one consultant (Information International s.a.l.) according to TOR covering all activities. The implementation was under the direct supervision of UNICRI and in close collaboration with UNODC and OMSAR.

32- UNODC/UNICRI full ownership of the outputs achieved and copy-write strengthened the role of the consultant to tackle corruption issues in the assessment report. However, UNODC and UNICRI should have remained to be responsible for the report ownership and the responsibility of the consultant to be restricted to its writing. In that context, the consultant's role in disseminating the report was questionable.

33- Discussing and publishing anti-corruption "top level cases" have been a negative rather than a positive approach in fighting corruption. This had the risk of lack of continuity of the project. It built an army of enemies facing one single output.

Effectiveness of the Consultant's TOR

34- In general, the TORs were a valuable document in evaluating implementation. They included the mandates that show the effectiveness of the TORs in avoiding the pitfalls of implementation that are described later in this report.

35- To explain this, it was mentioned in the TOR that the report should be evaluated by the Government of Lebanon during the occasion of the National Integrity Meeting (NIM). This would allow for the endorsement of the committee (NISC) as well as the Government (represented by OMSAR) for the output (country assessment report). This clarified the roles of the Government (OMSAR) and NISC vis-à-vis the roles of the executing agency (UNODC) and the consultant.

36- However, the TORs contain standard modules and formats regarding case studies, desk research, and focus groups. These did not take into consideration the sensitivity of the situation where "top level" case studies included names, actors who received bribes, who offered them etc...

37- For instance, the TOR identified cases to be studied where investigations and prosecuting lead no where and were unsuccessful. Due to the complexity of the political situation in Lebanon where sectarianism dominates the images of major politicians, this was not the best approach as to be easily politicized. Eventually, the common understanding of any assessment of such cases would be part of the struggle on the political level. Consequently, avoidance of mentioning names would have been preferred.

38- After all, the ultimate goal of the report was to benefit from these cases and not to publicize the people (negative political engagement with them) involved in them as identified by the consultant. Moreover, a common understanding between the project actors and the consultant on the TOR should have been developed.

3.1.2 Design and implementation of activities under Objective 1 (Phase II)

3.1.2.1 Activity 1.1.1

39- *Desk research on the extent of corruption with a role for OMSAR and UNICRI;* this step was logical and comprehensive to start the project with. The TOR requires from the consultant the collection and analyses of information and some statistics. However, mentioning names of people considered to be involved in corruption was not part of the TOR. It also required the proper referencing for any information assembled in the desk review. Referring to the interviews with several involved key individuals as well as documentations, the consultant bypassed the TOR and did not present the findings objectively but he presented them in an ‘investigation report’ form.

3.1.2.2 Activity 1.1.2

Selection and compilation of three case studies of top level corruption; Parties concerned in this activity are OMSAR, UNODC, and UNICRI.

40- In addition to problems identified in the section related to the effectiveness of the TOR (earlier), and after presenting the case studies, the consultant did not take into consideration the NISC’s objections and comments raised through UNODC. Also, the consultant did not consider that the data are not public but are the property of the project (UNODC/UNICRI). Moreover, the consultant bypassed the TOR with an extra work and extra effort in widening the data collection for reasons considered to be not clear.

41- The staging of these cases has blown up the project, stopping its up coming activities and caused the newly set government to change the flow of the project from fighting corruption, in this case it was prosecution, to a project of awareness at schools and publications.

3.1.2.3 Activity 1.1.3

Conduct 12 focus groups to describe corruption level, type, location extent, and remedies and write the findings.

42- Aiming to reach a high diversity in the focus groups from different institutions and backgrounds was a good method to support the country assessment report with reliable participatory discussions of its content. Moreover, the selection process for the focus groups’ participants, each of different specialties, has also resulted in a comprehensive feedback needed for the project.

43- It is worth noting that during this stage of implementation, cooperation and positive exchange of feedback between OMSAR, UNODC, NISC and the Consultant took place. For instance, the Consultant positively responded to the NISC’s request that

names of participants in the focus groups should not be presented in the focus groups results.

3.1.2.4 Activity 1.1.4

Set a joint evaluation meeting to discuss the findings of the country assessment report. Parties involved are UNICRI, OMSAR, and UNODC.

44- This step was designed to ensure that the three project actors (UNICRI, OMSAR and UNODC) will meet in a “joint evaluation meeting to discuss the findings of the Country Assessment” with no indication whatsoever to the role of NISC in that. Extensive meetings were held among all partners including NISC and comments and suggestions as well as objections were raised on the report.

45- At this stage, a conflict about the major findings of the report happened between UNODC, UNICRI and the consultant on one side and NISC and OMSAR on the other side. This led to a lack of trust between NISC and UN representatives. In the evaluation meetings, OMSAR and NISC accepted to disseminate the report in the experts meeting after their comments would be integrated.

Setting the experts’ meeting (22 January 2001)

46- This expert meeting was only documented and referred to in the discussion between the UNODC representatives and President of the Lebanese Republic Emile Lahhoud. He approved the experts meeting format even before the endorsement of the establishment of NISC by the government. Agreement was reached by the president on the content of this meeting.

47- The experts meeting was to present the country assessment by the consultant, present the preliminary strategy and the website by the NISC in the attendance of different audience including previous focus groups, media and many others.

48- NISC has participated in this meeting on a condition that all their comments mainly excluding names should be integrated in the report and the consultant presentation in the workshop. However, these comments were not taken into consideration. NISC has also raised a warning on the negative impacts and side effects of the report on the project if report will be presented as the version presented by the consultant.

49- Major objection of the government not to disseminate the report was omitted by UNODC. But, UNODC considered that the consultant “sheeted” by presenting names while the draft version of the presentation submitted to them did not mention names of people.

50- Consultant has a major role in presenting, disseminating the report and organizing the workshop. The consultant was presented by the UNODC/UNICRI representatives and his report mentioned that it was “funded by” the UN and had the UN logo.

51- The lack of participation of the government shows the self interest of the contractor in the output itself and in the turning wheel of the project more than the continuation. On the other hand, queries and uncertainties rise about the assessment report, its trust, affiliations, and the reputation of the influence of the intelligence services and the current political regime in the country against the passed one.

52- As a simple feedback, the protocol was not followed. The blessing and approval of OMSAR/NISC on the report has not been taken. As a result, the NISC was not the main presenter of the report in the expert meeting and it has never endorsed it as a first step in building the strategy and the national action plan.

3.1.3 General design and implementation of Objective 2 (Phase II)

53- The objective is to set a national integrity strategy and an Anti-Corruption Action plan through the establishment of a consensus among a broad group of stakeholders. This objective will be realized through the establishment of an independent National Integrity Steering Committee (NISC), prepare papers to guide the NIM, recommend a National Integrity Strategy and Anti-Corruption Action Plan and disseminate the Country Assessment Report input and findings in the NIM and launch the web-page.

At this stage, OMSAR has a strong role where the Lebanese government starts to consolidate the effort of UNODC assisting in reaching the goals and objectives of the project

This objective included several activities:

54- **Activity 2.1.1** The Government (OMSAR) will endorse the establishment of NISC and set its mandates and role and identify people to be appointed in the NISC. This activity was implemented easily and UNODC nominated members of NISC and made several meetings before the establishment was endorsed by the council of ministers in the decision number 51 dated 4 October 2000.

55- **Activity 2.2.1** The Government (OMSAR) through NISC will review and approve the papers and documentations to be presented in the NIM. This activity was restricted to the enrollment of the Lebanese governmental bodies (OMSAR and NISC) to have a complete responsibility and the full endorsement of these documents and the facts they present from the Lebanese government.

56- **Activity 2.3.1** Organize the 2-day NIM mainly for presenting the findings from the country assessment report and the key anti corruption tools. There would be also a broad discussion on the promotion and finalization of the strategy and the action plan. This activity is designed to be held after the full approval and the endorsement of the government (OMSAR and NISC) for whatever will be presented in the NIM. Involved in the organization of the meeting are UNODC, UNICRI, Consultant, NISC, and OMSAR. The main responsibility of OMSAR was the approval on the format of the meeting.

Moreover, OMSAR, jointly with UNICRI, will present the findings of the study. As for local consultant, his responsibility was restricted to facilitate the NIM with UNODC staff.

57- **Activity 2.4.1** Raise public awareness of the NIM through TV coverage and development of a national website. The website was developed by NISC through a financial contribution from the UNODC. It was launched in the expert meeting. However updates of the websites were not followed due to the obstacles that cause this phase to terminate and the committee to be practically suspended. Since at that stage, problems and obstacles were faced by the project, awareness has been shifted and focused in phase III.

3.1.4 Design and implementation of activities under Objective 2 (Phase II)

3.1.4.1 NISC formation, mandates and role

58- There are many observations on the formation, mandates and role of the NISC. In the project document, it was stated clearly that the Government (OMSAR) will participate in identifying people to be appointed in the NISC. However, the Government Decision No. 51 (dated 4 October 2000) to form the committee states clearly that the names were recommended by UNODC. Also, the decision does not state its structure, duration, legalization (whether it is a government committee or not), funding, role and host. Another issue was that forming the committee through a Government decision, which means high political level, contributed to politicizing of outputs. As expected, more confusion occurred among partners in the project due to a newly formed and completely independent setup without a higher authority to report to with no jurisdiction.

59- NISC reflects high level and well reputed stakeholders from different sectors in Lebanon. It is a suitable voluntary, yet not clear, structure that has an independent status and the know-how to plan, implement, and monitor the National Integrity Strategy. It should be note that the focal point of this anti-corruption project in OMSAR is at the same time member of the NISC. This lead to common view points for both entities as well as common referral for both through the evaluation.

60- However, NISC's role and mandates were extensively discussed with UNODC representatives before and after the government decision to endorse it with a contribution of an international UNODC consultant. In 25 October 2000 there was a consensus that the role was to set a strategy and an action plan as well as monitoring and assessment of its implementation. Also it should provide advisory services as well as raising awareness within the civil society. In addition, NISC was responsible for organizing the NIM along with UNODC staff members.

61- Also, the committee was formed earlier than planned for. From one side, this was a good move from UNODC to push for NISC initiation as its members are of high national integrity that could be very helpful in supporting the overall implementation of the project. On the other side, the NISC position on the Country Assessment Report

confused roles and responsibilities of different project actors. It was not clear whether the objection of NISC regarding the report content can stop its publication since according to the project design NISC and OMSAR had the full role at this stage of implementation. To this end, regardless whether NISC approval of the Country Assessment Report was mandatory or not, it is obvious that the many objections of NISC on the report and the UNODC and the consultant decision to publicize it anyway have contributed to blocking the implementation of the rest of the project activities.

62- In particular, NISC highlighted the danger of disseminating the report during the expert meeting. NISC requested to be sharing in the Country Assessment Report related decisions as it will be the basis to set the national strategy. Consequently, NISC assured that it should approve the report before its publishing. Since NISC is independent, and its members are participating in the project, they feared that the outputs would be negatively affecting them being involved in the process despite UNODC assurance that the assessment report will not be linked to the committee. However, they agreed that a final report should be elaborated by taking the most important information and publish it. The report should also include the definition of corruption and examples given to lead to an action plan and strategy.

63- Due to the previously mentioned confusions and ambiguity, NISC presented its own preliminary strategy in the experts meeting and launched the website.

64- Since the whole period of its establishment, NISC was not supported by any financial or logistics or technical assistance. Moreover, this committee was sometimes even not supported by those who pushed for it. When the NISC refused to approve the report before the experts meeting, representative of UNODC did not call for meetings thus causing NISC to meet in the private offices of its members. All of that led to a lack of cooperation with other project partners. To this end, UNODC did not show further support to NISC claiming that it does not represent the government anymore and its legal status is questionable.

65- Lack of clear role and mandate of NISC, rapid political changes among other factors led to its suspension. In 23 January 2001, one day after the experts meeting, with the presence of the international expert and representatives of UNODC and UNICRI, the role of NISC was again under discussion.

66- During a working group organized on the 27th of May 2002, and due to (1) the hectic period following the dissemination of the country assessment report, (2) accusations of the neutrality of NISC and (3) the stand of NISC members in considering the implementation of the ongoing project as their responsibility and that the remaining fund should be directly managed by them, the minister of OMSAR conveyed to UNODC the Prime Minister's wish not to provide any further role nor involvement of NISC in activities to be implemented in the field of combating Anti-Corruption.(Ref: Project progress report of January- June 2002). This decision opposes the previously set press conference by Ministers of Information and OMSAR on the 16 January 2001 at the UN house where NISC was introduced to the public.

Now the committee is inactive with no structure, meetings, work plan, or follow-up.

3.2 Phase III- Objective 1

67- As mentioned earlier, due to several obstacles and changes in political situation, phase three has been oriented from awareness through strengthening institutional bodies to awareness materials for fostering the culture of legality among the youth.

68- In this phase, even though there was no personal assigned to this project after the departure of the project coordinator in 2004, the national officer of the Juvenile Justice project took the responsibility on both projects.

69- Unlike Phase II, in this phase (Phase III), it was notices that OMSAR was the main body that was selecting the national experts and consultants and then recruited by UNODC.

3.2.1 General design and implementation of Objective 1 (Phase III)

70- This objective focused to prepare a code of citizenship for youth and socio-pedagogical training material that will be developed to enhance awareness among adolescence to fight corruption. This would be attained by developing a charter and then through training curricula material about culture of legality. This was implemented in cooperation among OMSAR, UNODC, MoEd, and MoYS.

71- During this phase, the interviews with the related stakeholders expressed positive feedback regarding the effective and good management and cooperation with the officer in charge of the project. There was an excelling and effective coordination and implementation of the project activities.

3.2.2 Design and implementation of activities in Objective 1 (Phase III)

The two activities under this objective are:

72- **Activity 1.1.1:** *OMSAR will take the responsibility of setting up a Technical Committee to lead and monitor the drafting process of the charter. Then, OMSAR will approve and disseminate the Code. Moreover, international experts will be recruited to participate in the elaboration and the drafting process of the charter.*

73- In the design of this activity, the age group that has been targeted in the code was modified smoothly and effectively in the implementation phase. In this activity, it is noticed that there was a wider participation of relevant stakeholders (MoEd & MoYS) as well as academics, youth group, NGOs, media, and international experts.

There was full cooperation between the technical committee that prepared the code and the representative of UNODC. Moreover, the government was cooperative however red tape led to some delays during the process. The international experts were not able to successfully help in the Code initiation due to their lack of local knowledge linked to

modeling with other experiences in other countries, which proved difficult to be implemented in Lebanon. However, they were on the other hand, of great help and provided their expertise to the provision of the educational material.

74- **Activity 1.2.1:** *OMSAR will select a national consultant to set the training educational material based on the Code. Moreover, OMSAR will set a technical committee consisting of national experts to help in the establishment of these training materials.*

75- The Technical Committee was confronted with a lack of enough data to be used in the establishment of the educational materials to make them appealing to the target age group. In addition to using the *Youth Charter on Combating Corruption* as a base for these materials, the Technical Committee used other sources such as psychological material about youth which the experts found relevant and necessary. This showed ethical and professional behaviors of the implementing Technical Committee. In addition to that, the fulfillments of the assigned activities needed a set of methodology to put and as such were set by the committee of this activity that was further developed by the national experts.

76- In general, this activity was considered successful. It was also effective and sustainable due to its endorsement and acceptance from the different partners.

Teachers' Manual Against Corruption

77- Following the advice of the national consultant a workshop was scheduled to come up with a teacher manual against corruption. Although that was not included in the design of the project, yet, the national consultants were able to modify the design to include this important step in empowering the teachers who were supposed to be informed of passing the information to students on fighting corruption. Due to the experimental approach, it was flexible to change the project design easily and added to the success of the project in its implementation. Even though this process delayed the implementation of the educational material, it helped positively in the improvement and more efficient implementation of the strategy.

78- As for the partners in these activities, even though they had good cooperation, MoEd and MoYS input was restricted administrative rather than conceptual levels. These ministries welcomed the positive progress and adopted the activities and went beyond their initial design where these training materials were included in the training curriculum of the MoEd. Moreover, there was an experimental approach in dealing and implementing the needed tasks. This has added to the sustainability of these activities.

79- In 2004, the project faced some delays due to management problem in UNODC where the local office coordinator and the regional representative terminated their mission, and due to the political situation in Lebanon where a new government was formed.

80- In general, flexibility in the process and the understanding of the coordinating personnel as well as their caring for the public interest has lead to outstanding results in these activities.

3.3 Phase III-Objective 2

3.3.1 General design and implementation of Objective 2 (Phase III)

81- This objective focused on increasing adherence of youth to the rule of law through the launching of awareness raising activities. This was a successful design for having a direct impact on target groups as well as raising awareness among them.

3.3.2 Design and implementation of activities in Objective 2 (Phase III)

The two activities under this objective are:

82- **Activity 2.1.1:** Implementation of the code and training in the selected pilot schools. The implementations of activities, however, were delayed due to insecurity status and certain major political events in Lebanon that followed the assassination of X-PM Hariri.

83- **Activities 2.2.1:** Surveying adolescence understanding, joint evaluation, and setting a National Forum. In National Forum (scheduled on 27th of April 2004), there will be a presentation of the Code of Citizenship for Youth. It is in cooperation of the OMSAR, MoEd, & MoYS. This activity was implemented easily with the participation of all stakeholders as well as the targeted groups.

84- Launching of the training materials including school manual has been done on the event of the UN international Day Against Corruption (on 9th of December 2005). There was positive interaction among stakeholders and the target groups.

85- As a general assessment for the above two activities, these activities were perfectly covered by the media and have had national acceptance. However, they were not set on time due to political turmoil, insecurity, and a delay in budget from UNODC HQ. On the other hand, useful efforts have been done from the officer in charge assuring the importance of its activities as well as the progress in implementation.

4. PARTNERS AND MANAGEMENT OF THE PROJECT

86- The key partners of this project are UNODC, UNICRI and OMSAR.

- **Center for International Crime Prevention:** UNODC was the executing agency in the project. It has the responsibility of coordinating the role played by the consultant, NISC, and OMSAR. It was the liaison between the stakeholders of the project. Even though its main role was and is still restricted to technical assistance to the Lebanese government rather than direct implementing agency, the copyright rule of the UN assured the ownership of any publication in the project.
- **United Nations International Crime and Justice Research Institute:** UNICRI was the cooperating agency. It has the databank for all the information. It was the key player in contracting and following up on the consultants and their progress in work and the output.
- **Office of Minister of State for Administrative Reform:** OMSAR was the **representative** of the Lebanese government which is the main beneficiary from the

project. As such, it had irreplaceable role in the organization as well as implementation of the project activities.

87- During the desk review, the evaluators had no problems in accessing data, where appropriate filing and availability of documents, and good archives covering all stages of the project implementation including media coverage, helped the evaluation mission to easily reach related information. Also, transparent and positive cooperation of the officer in charge contributed to the better understanding of the various issues related to the management practices during the project implementation.

Assessing the management structures, the following section describes the various managerial issues that shaped the project implementation.

88- There have been some delays due to bureaucracy (red tape) in the governmental institutions as well as UNODC HQ. Moreover, delays occurred due to the tight schedule that was already set in the design of the proposal. In general and as a feedback, cooperation between NISC and the consultant and between NISC and UNODC representative in Lebanon was not ideal where obstacles, mistakes, and lack of respect for the mandates of each other prevailed. The following management issues constitute the root causes of the difficulties faced during implementation:

- OMSAR did not effectively participate in setting the TORs of the consultant that will be contracted by UNICRI for writing the country assessment report since it is almost a standard format for UNICRI.
- The consultant has worked independently from OMSAR/NISC, however in a strong cooperation with UNODC and UNICRI.
- Report over passed the filters set in the TOR
- UNODC/UNICRI responsibility for monitoring and management of the consultant work led to several claims for bypassing the TOR and UNODC rules and regulations of not being bias in a political issue is to be further assessed.
- The work of the consultant started unofficially before signing the contract due to some delays from UNICRI.

5. OUTCOMES

5.1 Outcomes from Phase II

5.1.1 Output 1.1: Country Assessment Report

89- After thorough interviews with the various project actors, the following observations could be made:

- The TOR of the consultant included extracting information from newspapers and TV programs. Due to strong political campaigning and common lack of accountability in media, the accuracy of such information will not be enough to base a country assessment report upon.
- The report size that was limited to only 25 pages was not enough to include case studies and a country's strategy. This reflects that the report was not designed to hold that much of details and to go further into the specific cases of corruption in Lebanon.
- This report was accused by a subjective and bias approach rather than objective one. As well as it was not discrete during the process and it was accused of having some inaccurate information and missing references.
- The report gathered substantive information that should be taken into consideration in any future study.
- The consultant wrote a thorough report of comprehensive pages that was not easy to read. This issue should have been more carefully addressed by all parties focusing on the level of details needed in such an assessment report and the need of the consultant to fulfill this requirement as part of his TOR.
- The names of "corrupted people" as mentioned by the consultant and the selected cases gave the impression that the report under the UN slogan had a certain political driving motives rather than an objective approach towards corruption. This is evident in the strong NISC criticism. To this end, the selected cases exclusively showed that corruption has only one political background (Former Prime Minister Harriri's group). It is worth noting that the accuracy of information (Refer to observation No. 1 above) as well as exploring cases of other political groups were lacking.

5.1.2 Output 2.1: National Integrity Steering Committee

90- Despite the endorsement of the committee by the government and the high integrity image of its members, this committee could not properly follow up the project implementation due to reasons clarified earlier in this report. The ambiguity in NISC's role, mandates, authority, lack of funding, the negative effect on the Anti- Corruption

Country Assessment Report among other factors have jeopardized the effectiveness of this committee.

5.1.3 Output 2.2: Papers preparation for guiding the NIM in the development of an Anti-Corruption action plan

These documents were not produced.

5.1.4 Output 2.3: National Integrity Strategy and an Anti-Corruption action plan

91- Only preliminary NISC vision and plan were prepared to be presented in the experts meeting. As for the dissemination of the Country Assessment inputs and launching the website, they have been done during the experts meetings.

A press conference was set on the 16th of January 2001 to introduce to the public the NISC, its mandate and members.

As explained earlier, the dissemination of the report took place without organizing the NIM and without being endorsed by the Government (OMSAR through NISC).

5.2 Outcomes from Phase III

5.2.1 Output 1.1: Code of Citizenship for Youth

92- The objectives were met and succeeded with potentially having embedded provisions for the sustainability of the project. However, deadlines were not met (the Code was publicized in April 2004 and the materials were available in October 2005). That is not due to major obstacles in the design nor in the concept of the project.

93- Following the aim of the material in enhancing awareness of the youth against corruption, a Youth National Forum (27 April 2004) was established. This Code was considered inclusive on all aspects that tackle on corruption issues.

5.2.2 Output 1.2: Educational Training Materials

94- The outcome of this Phase can be labeled as positively implemented with its direct impact on students and teachers in pilot schools. However clear cut results of the activities on students can not be assessed at the moment since this needs summative evaluation. It is worth mentioning that the Code activities have helped in attaining the project objective.

5.2.3 Output 2.1: Adolescent's perception of corruption

95- This output is considered to be essential and it played a part in increasing the knowledge and awareness of students and teachers alike in pilot schools. However, summative evaluation can not be made yet.

5.2.4 Output 2.2: Consensus on a national anti -corruption action plan for youth to be elaborated during National Forum

96- That was an imperative step in launching the Anti- Corruption Action Plan and in raising awareness and consensus among the stakeholders, where politicians took the initiative to discuss the subject of corruption. In addition to that, the distribution of schools manual that is appealing for the youth was an important means by which the youth were involved in the project.

6. IMPACTS AND SUSTAINABILITY

6.1 Impacts

97- It is clear that the project was designed, implemented and updated during an unstable political period that has marked the Lebanese history.

98- First, the implementation took place at the beginning of President Lahhoud term where he firmly started his term with fighting corruption mandate – an issue that was attributed to a politically target campaign to opposing groups through heavy media campaigns and intelligence threatens. For that, the Complaint's office at the presidential palace was considered as the source of cases to be selected in the project design.

99- At the time when the project started, the Government of Lebanon, represented by Prime Minister Salim El Hoss was backing up the “anti corruption” efforts of the presidential Complaints office. This political environment has effected the orientation of the Country Assessment report into targeting one political group.

100- During the development of the Country Assessment, and as a result of the September 2000 parliamentary elections, a new government was formed at the end of 2000 by Rafic El Harriri himself. This turning point in the political situation has affected the project implementation as well as the project actors. Mentioning names of people that were again in power while suspicions on the content accuracy and political motives behind presenting those cases was a very challenging move that NISC did not recommend at all. Later on, Mr. Harriri proved to be supportive to the project concept which helped in redesigning the project document and shaping its new activities.

101- Minister of OMSAR worked on rebuilding the relation between the new government and the UNODC representatives.

102- For all these reasons, the impact of the first phase of the project was negative and not as desired during the project design. Regardless whether the accusations against the

Country Report were just or not, it is clear that more constructive approaches could have been used to lead to more credible outcomes.

103- It is worth mentioning that the negative impact of the Anti corruption project did not affect in any way the other main project conducted by UNODC office in Lebanon (Juvenile Justice) and the importance of the positive intervention of the UNODC office in Lebanon as mentioned by national stakeholders.

104- Phase III was launched during a turmoil that was very harsh which affected the implementation of the pilot project. This has oriented the planned sessions in schools in time and content where schools were on strikes and where discussion shifted from civic education on corruption to discussions on political changes in the country. This is addition to the managerial changes that the UNODC was passing through in that the regional as well as the national coordinators were in transitory phase. The outputs of this phase are considered to be essential and promising in being the first youth documents for combating corruption and it played a part in increasing the knowledge and awareness of students and teachers alike in pilot schools. However, summative evaluation can not be made yet.

6.2 Sustainability

105- First, despite the ownership of the UNODC/UNICRI of the Country Assessment Report, the high attention that was given to the report and its debatable content left it with no host. UNODC claimed that it is not responsible for that, OMSAR through NISC did not approve it and the only responsible host has been the consultant. For that, the report was born with deficiencies that were enough not to use it as it was planned. What was left is simply a debatable report with suspicions on the content and the so claimed political motives behind.

106- Second, even though the NISC still legally exist, but in reality it is suspension due to many reasons explained in details in this report. Mainly, the failure of the project to develop the national strategy and the related action plan left NISC with no tasks to follow in its relation to the project. Within this context, it is difficult to say that the project outputs were sustainable in any sense. OMSAR could not regain the trust of the government regarding the NISC's role in the project.

107- The Youth Charter on Combating Corruption as a pilot went beyond its intended output to appeal to other NGO's in the Arab region. Hence, as a pilot project it did not only have its impact on Lebanon and succeeded as such in awareness but it crossed borders to other Arab region.

108- On the other hand, the awareness dimension of the project, which was further developed in the second phase, ensured that the sustainability of the project outputs will be attained through the grown interests of the public at large and the students in particular. The integration of the anti corruption awareness material into the curriculum is the main tool for sustaining the project out puts. The sustainability also can be shows

through the probability of including other target groups such as parents, governments and others in the future as well as the integration of these materials in social clubs and other civil institutions. Currently, the project is still effective not only in the concerned ministries (OMSAR, MoEd, MoYS) and its endorsement for the material and code but also through UNODC by calling for meetings with school representative to stress the importance of the project and there willing to follow it as well as distributing anti-corruption tool kit for more than 2000 schools in Lebanon.

7. LESSONS LEARNED & RECOMMENDATIONS

7.1 Lessons learned

109- The difficulties the project faced during the implementation of phase II could have jeopardized the whole project concept. These difficulties marked anti corruption initiatives with substantial questions related mainly to their driving motives. For that, drawing lessons from this project, that was designed to be a model project, is extremely important to avoid some of the potential pitfalls of similar anti-corruption projects in the future. Such lessons could be summarized as follows.

- Political turmoil and the consequent effects on such a project dealing with high visible and close political mandate should not be underestimated. Further diagnosis of the political environment could have helped avoiding many of the project constraints.
- A project of similar concept, especially affected by ongoing political changes, should not be dependent on one single activity. Producing the country assessment report turned to be the main activity that labeled the whole project. Any failure in the implementation of this activity eventually meant a project failure. After all, the ultimate goal of the project was to set the bases for fighting corruption in Lebanon and not producing the report itself.
- Following the same logic of the above mentioned lesson, widening the scope of activities to reach other dimensions diversifies risks while maintaining the same project orientation. Redesign of project activities in phase III to target schools and awareness and the positive impact of that away from political speculations was very sound.
- Participation of different actors in implementation is extremely important however is not easy at all. A careful design and special attention should be given to ensure not only the active but also the positive participation of all actors involved. It is important to have a more comprehensive consensus building process to make sure that national partner collaborative potentials will not change into needless hostile positions.
- Recognize that corruption is a conflict that should be solved. Solving corruption ahead of time can be approached by applying conflict prevention methods through awareness, special benefits and awards to employees on one hand, and by fighting corruption in each ministry and governmental institution (conflict resolution).
- For achieving project objectives, activities for fighting corruption within the project should not be politicized.

- Media played an important role in project dissemination and impact; however, it would be destructive if it loses its objectivity.

7.2 Recommendations

110- Anti- corruption topic is sensitive to deal with; it is preferable for the UN agencies before designing any assistant project for one of its member countries to take into consideration the following suggestions:

- Analyses the decision of the partner government to fight corruption, its level, and insure that this decision is a strategic rather than a political decision. The analyses should also include an assessment on the capability and will to attain the aims and objectives of the set project.
- For implementing supportive projects to the Lebanese government, it is essential to follow a participatory process that includes not only the simple governmental approval and endorsement of the project design but also its active participation during the design period.
- A clear definition of roles and responsibilities for the different actors is preferred. More precisely, and without disregarding the need for active participation of the different actors, the project management should focus the implementation of the project activities in cooperation with the actual focal point. In this project, despite the fact that OMSAR is officially the project focal point; there has been a significant confusion in roles and responsibilities especially in light of NISC creation.
- In order to protect the UN efforts, its role, the aim and vision in the activities of the project are very important to be set clearly in the agreement and the project design.
- To build up on the work and objectives achieved and follow up the activities which were implemented successfully, with supporting projects.
- Educational materials, activities targeting youth and academic curriculum should be highly supported in collaboration with governmental institutions as well as international organizations since it has a positive direct impact on anti corruption process and build-up supportive campaign.
- Implementing separate projects to support strengthening governmental inspection and monitoring institutions would be effective.
- Like a Human Right Watch, an Anti- Corruption Monitor Watch should be established. It is essential to monitor the corrupted activities in the country. Such institutions should be established financed and supported from UN, international organizations and civil organizations. This UN endorsement would give power and backup for the people evolved in this institution.

- For effective and proper implementation of projects especially those dealing with sensitive issues, it is important to have specific personal for each project.
- Regular and efficient monitoring of UN agencies held responsible for the project is necessary.

8. OVERALL CONCLUSIONS

111- Mr. Steffan Demistura, “UN Secretary General Personal Representative to the South” said that “the report went too far, because it pointed fingers at individuals and that is not the role of the UN”. Two days after the Country Assessment report was publicized UNODC disavowed it. The report “do not reflect the official position of the secretariat of the UN not that of the center for international crime prevention”, he added (Ref: daily Star, edition 10 March 2001/ Desk review).

112- This clear cut statement of Mr. Demistura reflects the high political dimension the project gained through publishing the Country Assessment Report and the respective negative effects on the implementation. To this end, there are several conclusions that could be summarized as follows:

- The Country Assessment Report indicates, for a certain, extent the level of corruption in Lebanon.
- Weak monitoring institutions in the country have made data availability and reliability about corruption very difficult.
- The mechanism of assisting the national partner to build the National Integrity Strategy and an Anti- Corruption Action Plan should be sequential in terms of activities and timeframe.
- Role of such a project is to support existing initiatives or help starting them but definitely not to interfere in the ongoing political debates and not to take sides. Should the political situation not be in the same direction with the project orientation, the project should not take the initiative to proceed in implementation as planned. To this end, redesigning projects become inevitable.
- The educational materials targeting youth and academic curriculum is significant endeavor where its implementation does not phase major obstacles due to its un-politicized context.
- In member countries, UN initiatives should always be laid down to be able to tackle sensitive issues related to nationals as well as international reform, stability, and progress.

9. ANNEXES

Annex I.....	TOR of the consultant
Annex II.....	List of interviewees

Annex I: TOR of the Consultant

UNITED NATIONS OFFICE ON DRUGS AND CRIME

IN-DEPTH PROJECT EVALUATION

TERMS OF REFERENCE

Project	Support to the National Anti-Corruption Strategy LEB/98/R71
Post title	Consultant
Work time	1 month (one week for meetings and desk review)
Duration	January 2005
Remuneration	3500USD

BACKGROUND

This is a project of the United Nations Office on Drugs and Crime, Anti-Corruption Team, Human Security Branch, Division of Operations, and the Government of Lebanon (Office of the Minister of State for Administrative Reform), in collaboration with experts across ministries (Education, Youth and Support) and across fields. The project was executed in two parts herein and for purposes of the evaluation referred to as Part I and Part II. Each part had distinctly different sets of goals, objectives, and corresponding activities and output while sharing the overall aim of supporting national capacity and action to address corruption.

Part II constituted a revision of Part I and was made at the request and with the agreement of the Government of Lebanon. Part I involved country assessment and national integrity strategy and plan. Part II, organized by phases of activity across clusters, was an anti-corruption youth ethics education. It involved, inter-alia, elaboration and introduction via pilot testing of instructional material in schools and awareness-raising and promotional activities.

Project Lebanon was intended to provide technical advisory assistance to the Government of Lebanon in support of its own anti-corruption strategy and initiatives and, in the second part, focusing on youth initiatives through elaboration of material and integration of specific education into the schools of Lebanon.

EVALUATION PURPOSE

The national evaluator, recruited locally, will analyze (a) project concept and design, (b) project implementation, and (c) outputs, outcomes impact and sustainability of project R71.

The evaluator will ensure that lessons learned from the project will be recorded and recommendations on possible follow-up activities will be made, as appropriate.

(a) The Evaluation Team should indicate whether/how the projects contribute to a priority area or comparative advantage for UNODC. The team will review the problems identified by the projects and the corresponding project strategy chosen in order to address them. The evaluation should also encompass an assessment of the relevance and attainability of the objectives and of planned outputs, activities and inputs, as compared to other cost-effective alternatives, if/as available. An analysis of the clarity, logic and coherence of the projects should also be provided for.

(b) The evaluator will assess how efficiently project planning and implementation have been carried out, which includes assessing to which extent organizational structure, managerial support and coordination mechanisms used by UNODC support the projects. He/she will analyze problems and constraints encountered during implementation as well as the quality and timeliness of inputs and the efficiency and effectiveness of activities carried out.

(c) The Evaluator will indicate whether results have been achieved, and if not, whether there has been some progress made towards their achievement. It will assess the usefulness of results and outcomes and whether the projects have created impact. This should also encompass the likely sustainability of results and benefits as well as the project's contribution to human and institutional capacity building.

(d) The evaluator will record lessons learned from the projects and make recommendations as appropriate. They should constitute proposals for concrete action that could be taken in the future to improve or rectify undesired outcomes. Recommendations may also be made in respect of issues related to the implementation and management of the projects and follow up projects dealing with the same issues.

EVALUATION METHODS

The Evaluation Unit will provide details and information to the Evaluator, so as to ensure adherence to governing rules, regulations and guidelines for UNODC/UN evaluations of projects. The Evaluation Unit provides the UNODC Standard Format and Guidelines for Project Evaluation and reporting. These indicate that which is required to be covered in the evaluation. The evaluator develops and pursues its own detailed evaluation strategy, work plan, etc. The Evaluation Unit reviews and provides comment on this design. Certain elements of the evaluation methodology are to be included. These are:

- Desk review of all relevant documents available;
- Interviews with participants and clients in relevant agencies regarding impact of the program, as well as with representatives of recipients as appropriate;
- Interview of direct beneficiaries and representative targets (audience) of the project, government officials, etc.

EVALUATION TEAM COMPOSITION

The evaluation will be carried out by a local evaluator, as nominated by UNODC. The expert should have excellent knowledge of judicial and social aspects relating to criminal justice reform. Experience in conducting evaluations is desirable. At least 8 years

relevant professional experience required. Post graduate level education in a relevant area required. Excellent drafting and communication skills in English and Arabic.

PLANNING AND IMPLEMENTATION ARRANGEMENTS

This evaluation will be a joint effort between the consultant and UNODC. As for substance, it is critical that the team is independent and conducts a thorough evaluation covering both technical aspects of the projects and also the management of the project itself. The evaluator will have access to all relevant documents and staff, who have worked on the projects.

UNODC officials responsible for briefing the team are:

- **At the Project Office in Beirut:** Renée Sabbagh, national project expert of R 72 and R 30, in consultation with Alexandre Schmidi, Deputy Representative UNODC Field Office in Kabul/ Afghanistan (former international project coordinator of R 72);
- **At UNODC's Regional Office for the Northern African and Middle East Region in Cairo:** Mohamed Abdul-Aziz, Regional Representative, Leif Villadsen, Project Officer.
- **At UNODC's HQ's in Vienna:** Anti corruption unit, Mr. Oliver Stolpe.

PERFORMANCE INDICATORS

Timely and accurate submission of the documents. Substantive and linguistic quality of the documents prepared. Conformity of the project evaluation report with the standard format and guidelines for the preparation of project evaluation reports and the guidance received.

WORK ARRANGEMENTS

The evaluator will prepare a draft evaluation report, by the 23rd of January, which will be considered by officials of the Government of Lebanon as well as of the UNODC Beirut office.

The evaluator is to be available for clarification of content of the document and steps taken in the terminal report.

The deadline for the submission of the final evaluation report will be the 31st of January 2006.

Annex II: List of Interviewees

Date	Time Interval	Persons	Position	Purpose
29/12/2005	11:00am-12:00pm	Mrs. Renée Sabbagh	National Program Officer (NPO- UNODC).	Revision and discussion on TOR of the National Evaluator.
3/1/2006	4:00pm- 5:30pm	Mr. Rahif Hajj Ali	OMSAR- ARLA Executive Manager, Senior Policy Analyst, Institutional Development Unit.	Revision and discussion on TOR of the National Evaluator.
5/1/2006	11:00am-12:00pm	Mr. Hanna Awkar	Chief OF Teacher Formation and Training.	Discussion on activities and socio-pedagogical material in phase III.
5/1/2006	1:20pm-4:20pm	Mrs. Gina Chammas	Ex-advisor to the Lebanese president on Finance and spending, and member of NISC.	Discussion on project R 72 and the role played by NISC in phase II.
6/1/2006	10:20am-12:00pm	Mr. Jawad Adra	General director of the International Information (II), researcher consultants.	Discussion on project R 72 and the role played by the consultant in phase II.
7/1/2006	10:00am-11:00am	Dr. Hisham Nashebi	President of the committee for drafting the Charter of Youth.	Discussion on the role played by the committee of the "Charter of the Youth" in phase III.
11/1/2006	10:00am-11:00pm	Adnan Iskandar	Retired Professor and Researcher member of the NISC.	Discussion on project R 72 and the role played by NISC in phase II.
11/1/2006	11:45pm-12:45pm	Mr. Fouad Saad	Deputy in the Lebanese Parliament. Minister of OMSAR after September 2000 in Phase I and the beginning of Phase II.	Discussion on project R 72 and the role played by the government during phase II.
16/1/2006	5:00pm-6:00pm	Mr. Philippe Khairalla	President of NISC, Judge and ex-president of the High Judicial council, President of the court of Cassation, President of	Discussion on project R 72 and the role played by NISC in phase II.

Date	Time Interval	Persons	Position	Purpose
			NISC.	
18/1/2006	3:30pm-5:15pm	Mr. Rahif Hajj Ali	OMSAR- ARLA Executive Manager, Senior Policy Analyst, Institutional Development Unit.	Discussion on the role played by OMSAR and NISC and asking for supporting documents.
20/1/2006	11:15am-12:15pm	Mr. Boutros Harb	Former Education Minister, Batroun Mp since 1972 (except for 1992-1996 Boycott) and member of NISC.	Discussion on project R 72 and the role played by NISC in phase II.
25/1/2006	2:30pm-	Mr. Alexander Schmidt	Coordinator of the project until February 2004.	Discussion on project R 72 and the role played CACP in the implementation of phase II.