

AID MONITORING IN HUMANITARIAN DISASTERS

*A case study on the response to
the Beirut Port Blast of August 4, 2020*



THE LEBANESE
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the global coalition against corruption

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“ENSURING ACCOUNTABILITY IN RECONSTRUCTION AND REFORM EFFORTS IN LEBANON” (EARREL) PROJECT

Ensuring Accountability in Reconstruction and Reforms Efforts in Lebanon (EARREL) is a two-year project funded by the German Federal Foreign Office and aiming to ensure greater accountability and transparency in humanitarian aid and reconstruction efforts particularly for those most affected by the Beirut port explosion. The project is a multi-partner action that is being led by the Lebanese Transparency Association - No Corruption (LTA) and the Lebanese Crisis Observatory (AUB), and supported by the expertise and networks of TI-S.

The project seeks to achieve three main objectives which are: better equip local civil society and journalist networks with the knowledge and tools to ensure greater accountability and transparency in aid management and reconstruction efforts, aid state actors in improving government reforms and transparent crisis management, and through the project citizens would be properly equipped to report on and monitor corruption, particularly in areas impacted by the explosion.

To achieve the project's objective, activities are set into three categories; research, monitoring and advocacy, and capacity development. On research, an aid tracker methodology, and an online platform will be produced with the aim of collecting and analyzing data related to transparency in international aid and reconstruction efforts. Under monitoring and advocacy, the data extracted out of the research will then be analyzed to identify the shortfalls that challenged the implementation of proper transparency and accountability measures. The advocacy objective is to leverage the findings through policy papers with recommended measures that can mitigate the identified shortfalls and strengthen best practices in stakeholders that partake in reconstruction, recovery, and reform efforts following the Beirut Port Blast on August 4th, 2020.

Considering that research, monitoring, and advocacy are key components in advancing accountability and transparency in aid management under the EARREL project, the policy papers under EARREL aim to further analyze findings to formulate tools and recommendations that can further propagate international best practices in aid management, localize them, and to disseminate the intended advocacy campaign surrounding accountability in reconstruction, recovery, and reform efforts through promoting whistle-blower protection, anti-corruption legislations, good governance, and transparency in aid across the sectors of response.

In this respect, this policy paper on Aid Monitoring in Humanitarian Disasters highlights prominent cases of aid monitoring during humanitarian disasters with emphasis on the Beirut Port Blast Case. The policy paper will also present international best practices on aid monitoring to produce a holistic index on transparency in aid in order to better assess the performance of stakeholders and institutions within the lines of aid management.

ABSTRACT

Amid the ongoing economic and monetary crises Lebanon is witnessing, and during the COVID-19 pandemic and its negative impact on efforts to restore the economy, the Beirut Port Blast in August 2020 had a devastating impact on the economic, trade, social, and most importantly, on the humanitarian level.

In response to the explosion, the global community has initiated the “Reform, Recovery, and Reconstruction Framework – (3RF)” to help Lebanon in its recovery efforts. High levels of corruption, however, pose a threat to the effectiveness and efficiency of such a framework, as corruption might negatively affect its proper implementation leaving those in need of aid without help, in addition to undermining reform and recovery efforts.

Throughout this paper, best practices on transparency in aid are presented as a tool to limit and prevent corruption within aid operations, a comprehensive index is created to measure the levels of transparency of aid operations under the 3RF as transparency can act as a deterrent for those who would abuse aid funds in line with their personal interests.

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Aid Monitoring in Humanitarian Disasters; A Case Study on the Response to the Beirut Port Blast of August 4, 2020 Principles of Transparency and Accountability Governing the Court of Accounts

Introduction

In 2020, Lebanon witnessed the largest explosion ever recorded at the Beirut port. The explosion shredded a huge portion of the city, leaving approximately 300,000 people homeless, more than 6,000 reported injuries, and more than 170 deaths¹.

Lebanese Context

In October 2019, Lebanon found itself in the middle of a monetary and economic crisis which led to the government's default on its sovereign debt on March 9, 2020². More than two years after its default, the Lebanese government is yet to initiate negotiations with foreign and national debt holders³; this has led to the lack of trust from both national and global communities in the government. However, the Lebanese government has reached a Staff-Level Agreement with the International Monetary Fund (IMF), which could give the government access to USD 3 billion⁴.

Nonetheless, the Staff-Level Agreement is conditional, it requires the Lebanese state to adopt serious reform measures prior to receiving any financial assistance. This means that even after the approval of the Agreement by the IMF Management and its Executive Board, the implementation is going to be delayed until the conditional reforms are adopted and implemented by the Lebanese state.

This comes at a time when adoption and implementation of anti-corruption regulations are undermined on different levels; whether through the parliament or the Council of Ministers, by refraining from appointing regulatory authorities such as the Electricity Regulatory Authority that had its establishing law adopted in 2002 for example. The Council of Ministers also refrained from appointing the Board of the Public Procurement Authority before the Council became a caretaker government on the 22nd of May 2022.

The parliament on the other hand either adopts fragmented anti-corruption and economic reform laws, or delays the adoption of efficient ones, such as the illicit enrichment law, combatting corruption in public sector law, asset recovery law, etc.; in addition to delaying the adoption of the draft capital control law following the crises that were triggered in 2019 which have led to informal and uncoordinated management of the monetary crisis by banks.

¹ Situation report – Lebanon Blast. World Health Organization. Issue 5. Available at:

<http://www.emro.who.int/images/stories/lebanon/documents/lebanon-blast-situation-report-11-8-20.pdf?ua=1>

² "For the first time, Lebanon defaults on its debt". The Economist. March 2020. Available at:

<https://www.economist.com/middle-east-and-africa/2020/03/12/for-the-first-time-lebanon-defaults-on-its-debts>

³ "Foreign creditors urge Lebanon to begin debt restructuring talks". Reuters. September 2021. Available at:

<https://www.reuters.com/world/middle-east/lebanons-international-creditors-urge-new-govt-begin-debt-restructuring-talks-2021-09-21/>

⁴ "IMF Reaches Staff-Level Agreement on Economic Policies with Lebanon for a Four-Year Extended Fund Facility". IMF. April 2022. Available at:

<https://www.imf.org/en/News/Articles/2022/04/07/pr22108-imf-reaches-agreement-on-economic-policies-with-lebanon-for-a-four-year-fund-facility>

The Lebanese government and society are facing several challenges since October 2019; one of the main challenges that had, and is still having, major devastating implications is the currency devaluation which has affected the public and private sectors alike. The effects on the health sector were particularly damaging for society, especially since they unfolded at the same time as the COVID-19 pandemic. The results came in lower quality and availability of health services, in addition to an increase in costs that made them too expensive for average Lebanese citizens and residents.

Amid these crises and challenges, unemployment reached 30% in 2022 as a recent mapping by the Central Administration of Statistics shows⁵, multidimensional poverty and multidimensional extreme poverty reached 82% and 40% respectively in 2021⁶. Inflation of food commodities' prices reached 340% according to the World Food Program⁷. In addition, the gross domestic product (GDP) collapsed from USD 55.2 billion in 2018 to USD 31.7 billion in 2020⁸ with an inflation rate that reached 239% in January 2022 according to the Central Administration of Statistics⁹.

All the above challenges and issues facing the Lebanese people have led them and the global community to distrust the Lebanese State and its agencies even more. Strategies, policies, decisions, and even laws are not well received by the public and are hardly applied especially when the public is involved in the implementation process. Decades of neglect, corruption, secrecy within the public sector, occupation by foreign powers, and political strife has made the operations of public entities ineffective and inefficient, which is one of the main drivers of distrust in government¹⁰.

Trust is required to maintain the stability of the society; otherwise, social unrest might lead to unwanted results that could lead to the dissociation of society. Building back trust requires preemptive and proactive actions from the government, especially within the Lebanese context in response to a disaster such as the explosion of the Beirut Port. Trust is rebuilt by engaging the public with public authorities, this engagement can be through public consultations and transparency.

Transparency is an essential rule to make the public aware of what the government is doing, which will also allow for judicial and political accountability. In this sense, transparency is not a mere procedural matter that public entities attend to, it is rather directly related to a fundamental human right, the Right to Access Information, which enjoys a constitutional guarantee in Lebanon and is regulated by Law No. 28/2017, its amendment Law No. 233/2021, and Implementation Decree No. 6940/2020. This constitutes the Right to Access Information legal framework in Lebanon, which obliges public and private entities performing operations within the public sector, to proactively publish information on decisions, financial transactions, contracts, annual reports, etc.

⁵ "Central Administration of Statistics and the international Labour Organization Launches a Mapping of the Working Force in Lebanon in 2022". National News Agency. May 2022.

⁶ Multidimensional poverty in Lebanon (2019-2021). Painful reality and uncertain prospects. United Nations - ESCWA. p. 2. Available at:

https://lebanon.un.org/sites/default/files/2021-09/21-00634-_multidimensional_poverty_in_lebanon_-_policy_brief_-_en_0.pdf

⁷ Lebanon - Country Brief Report. World Food Programme. Available at: <https://ar.wfp.org/countries/lebanon-ar>

⁸ Lebanon – GDP. World Bank. Available at: <https://data.worldbank.org/indicator/NY.GDP.MKTP.CD?locations=LB>

⁹ Consumer Price Index. Central Administration of Statistics. January 2022. Pg. 11. Available at:

http://www.cas.gov.lb/images/PDFs/CPI/2022/1-CPI_JANUARY%202022.pdf

¹⁰ See Global Corruption Barometer report from 2019 on the MENA region to view how Lebanese people view corruption within governmental agencies and the levels of distrust in the government. Transparency International. 2019. Available at:

<https://files.transparencycdn.org/images/2019-GCB-Middle-East-and-Africa-Report.pdf>

The Reform, Recovery, and Reconstruction Framework (3RF)

In response to the Beirut Port Explosion, the World Bank, the United Nations, and the European Union conducted a Rapid Damage and Needs Assessment (RDNA) in August 2020¹¹, to stand on the need to recover from the impact of the explosion. This led to the creation of what is known as the “Reform, Recovery, and Reconstruction Framework (3RF)” in December 2020, by the above-mentioned entities.

The 3RF has three main goals¹²:

- 1) People-centered recovery focusing on the improvement of social justice;
- 2) Reconstruction of critical assets, services, and infrastructure focusing on equal access to basic services and sustainable economic recovery; and
- 3) Reform to develop governance, create suitable conditions for reconstruction, and regain people’s trust in the government and its agencies.

These three goals are distributed over two tracks¹³:

- 1) People-centered recovery; and
- 2) Reform and Reconstruction.

Under these two tracks, the 3RF consists of four main pillars that provide a holistic approach to addressing the different sectoral, governance, economic, social, and infrastructure deficiencies. These pillars are¹⁴:

- 1) Improving governance and accountability;
- 2) Jobs and economic opportunities;
- 3) Social protection, social inclusion, and culture;
- 4) Improving services and infrastructure.

What matters here is the cost of implementation of these pillars and the social, economic, and even legal impact on Lebanese society, as it includes capital injection into the economy through official and private channels, coming indirectly from taxpayers’ money in countries funding the 3RF, to perform an operation that is the Lebanese government’s job in the first place.

Adopting new regulations, policies, and strategies that will be conducted by the government, global community entities, and civil society organizations (CSOs), in addition to performing and/or providing a public service and patronaging economic recovery; all of these have an impact on the daily lives of individuals and society as a whole. This justifies the application of what applies to the government in terms of transparency and accountability on the 3RF itself and its implementing parties. The public has the right to know how their lives are being regulated, and how solutions for their problems are being adopted and applied whether it is a public or private entity responsible for the implementation of such tasks.

11 Beirut Rapid Damage and Needs Assessment (RDNA). World Bank. August 2020. Available at: <https://www.worldbank.org/en/country/lebanon/publication/beirut-rapid-damage-and-needs-assessment-rdna---august-2020>

12 Lebanon Reform, Recovery and Reconstruction Framework (3RF). World Bank. December 2020. Pg. 29. Available at: <https://documents1.worldbank.org/curated/en/948021607068524180/pdf/Lebanon-Reform-Recovery-and-Reconstruction-Framework-3RF.pdf>

13 Idem.

14 For details on each pillar see: idem. Pgs. 35 through 59.

The below tables show how the estimated budget is allocated per pillar¹⁵:

Table 1: Priority Costs for Pillar 1

	Track 1: People-Centered Recovery (\$)	Track 2: Reforms and Reconstruction (\$)
PFM and public procurement	250,000	1,550,000
Anti-corruption, integrity, and transparency	2,350,000	2,050,000
Justice and human rights	2,150,000	725,000
Pillar 1 total	4,750,000	4,325,000

Table 2: Priority Costs for Pillar 2

	Track 1: People-Centered Recovery (\$)	Track 2: Reforms and Reconstruction (\$)
Restore business activities and preserve jobs	96,000,000	193,000,000
Strengthen the insurance sector and digital financial services	1,200,000	350,000
Expedite urgent business environment reforms	550,000	3,475,000
Pillar 2 total	97,750,000	196,825,000

Table 3: Priority Costs for Pillar 3

	Track 1: People-Centered Recovery (\$)	Track 2: Reforms and Reconstruction (\$)
Social protection	70,700,000	871,030,000
Social cohesion, inclusion, and gender	27,100,000	3,300,000
Culture	77,000,000	144,000,000
Pillar 3 total	174,800,000	1,018,330,000

Table 4: Priority Costs for Pillar 4

	Track 1: People-Centered Recovery (\$)	Track 2: Reforms and Reconstruction (\$)
Housing	209,650,000	32,409,250
Port	33,750,000	313,500,000
Urban services	46,820,000	113,773,000
Public services	16,650,000	322,206,362
Pillar 4 total	306,870,000	781,888,612

¹⁵ Idem

The total estimated budget for the 3RF across both its tracks and four pillars is USD 2,585,538,612, which is projected to be spent over the span of 18 months. In highly corrupt environments, the influx of aid or their monetary resources can easily fall prey to existing corrupt networks and practices, such as conflict of interest, and trading in influence. The risks can be especially high when it comes to the procurement of goods and services and the disbursement of in-cash or in-kind support to the beneficiaries of the program.

The implementation of the 3RF cannot be implemented without an accounting approached merely from a development perspective. Levels of corruption in the public sector in Lebanon are alarming, in 2021, the country scored 24/100 in the Corruption Perceptions Index issued by Transparency International, with a rank of 154/180¹⁶.

Methodology

In accordance with the above, aid response to the Beirut Port Explosion must be monitored closely to limit and prevent corrupt practices, in addition to making the public aware of how their lives are being indirectly regulated through the 3RF due to the legal and institutional reforms required also by the framework. This paper assesses the 3RF's level of transparency level to allow for enhanced accountability. The evidence generated will, in turn, provide direct aid providers and implementers with evidence that will help them apply aid best practices to fulfill the objective(s) of the framework and to limit and prevent corruption in the aid process.

In the wake of the current crises in Lebanon, this paper will propose a methodology to monitor aid by providing an index with detailed indicators that can be applied on different aid operations, and which will be applied on the "Building Beirut Businesses Back and Better – B5 Fund" operation which is the only operation initiated with publicly available information. The results of the index will be able to provide the reader, aid providers, and implementers, with a comprehensive understanding of where the gaps/issues are in the aid process, in addition to the strong procedures already in place, while aiming at strengthening safeguards to limit and prevent corrupt practices within the specified aid operation.

The Index will target transparency measures of in-kind, whether tangible or intangible assistance such as capacity building, or /and in-cash aid, in addition to procurement performed by private entities under the B5 Fund.

The Index will also include sections with indicators on reconstruction and public procurement within the aid process, specifically under the 3RF. However, these sections will not be applied in this paper due to the fact that reconstruction and public procurement with the aid process are yet to be initiated.

**A detailed methodology on the index will be provided under its section.*

¹⁶ Corruption Perceptions Index – Lebanon. Transparency International. 2021. Available at: <https://www.transparency.org/en/cpi/2021/index/lbn>

Best Practices for Monitoring Aid

Monitoring aims at limiting and preventing corrupt practices within the aid process. It is also meant to provide all relevant stakeholders, donor agencies, aid providers, and the general public with a comprehensive picture of how aid flows are being used. There are different ways to monitor aid, however, no tool on its own can entirely eliminate corrupt practices. One strategy to help ensure that aid disbursements are free of corruption and fulfill their intended goals is to promote transparency, which can serve as a preventive measure. Transparency can enhance accountability, as it will limit the ability of corrupt individuals to abuse the aid process. However, as Transparency International Handbook on Preventing Corruption in Humanitarian Operations¹⁷ provides, there are a number of reasons why organizations might refrain from transparency to identify corrupt practices within the aid process; nonetheless, these reasons must be weighed against the positive impact of aid transparency before refraining from publishing all information.

Defining Aid Transparency

Transparency of aid is a key tool to ensure that all those involved in the aid process such as governments, donors, and CSOs are held accountable in terms of fundraising, coordination, and efficient spending¹⁸. Three core aspects are important to keep in mind when using transparency as a way to improve the accountability and efficiency of aid¹⁹. An efficient transparency framework should:

- 1) Allow traceability: apply the “follow the money” standard from its source (donor) to where it is spent (aid recipient);
- 2) Cover the totality of the aid flows: present all direct and indirect resource flows; and
- 3) Ensure timely disclosure: timely access to accurate information.

The above aspects should include information not only on financial transactions, but also information on the donors and entities managing and/or facilitating aid, in addition to the operational information of the project/activity²⁰. Information should include, for example, project level details such as project title, the sector of intervention, description of the project, detailed budget, and spending data accompanied by a Citizen Budget format, targeted locations or the locations of intervention, and progress information on the implementation of project/activity²¹. In this sense, the timeliness of access to information is the cornerstone for effective advocacy and coordination as acknowledged by humanitarian organizations and donors²². For this purpose, aid funds should be made publicly available through an information system and/or register.

¹⁷ Handbook of Good Practices: Preventing Corruption in Humanitarian Operations. Transparency International. 2010. Available at: https://images.transparencycdn.org/images/2010_HandbookHumanitarianOperations_EN.pdf

¹⁸ US Transparency: An Assessment of US International Aid Transparency Initiative Data. Publish What You Fund. 2018. Available at: <https://www.publishwhatyoufund.org/wp-content/uploads/2018/11/us-transparency-report.pdf>

¹⁹ An Introduction to the International Aid Transparency Initiative (IATI) for Humanitarian Actors. Background Paper. Development Initiatives. February 2017. Available at:

<https://www.alnap.org/system/files/content/resource/files/main/an-introduction-to-the-international-aid-transparency-initiative-iati-for-humanitarian-actors.pdf>

²⁰ International Aid Transparency Initiative (IATI). Available at: <https://iatistandard.org/en/about/>

²¹ Idem.

²² The Power of Transparency: Data is Key to an Effective Crisis Response. Relief Web. April 28, 2020. Available at: <https://reliefweb.int/report/world/power-transparency-data-key-effective-crisis-response>

Means of Publication

Transparency can be through different forms, however, paper-based transparency in contexts like Lebanon is still considered the only means to transparency. Some information is not available on the websites of public administrations if any is even available, nonetheless, if an Information Request is submitted formally to an administration, they might provide the requested information in paper format.

Governments, donor organizations, and private entities involved in the aid process should use technology to ensure aid transparency. Using technology should be at the early stages through the necessary systems which will allow all parties involved to coordinate their work and improve its efficiency. This facilitates the identification of red flags and increases the efficiency of tracking resource flows²³; in turn, this will allow for more efficient transparency to disseminate information to the public.

Using technology to ensure transparency comes with challenges, especially in countries with issues in internet access and electricity shortages such as Lebanon. The technology used must not rely completely on constant electricity supply nor constant internet connectivity. The technology used should not require advanced computing skills to navigate through. The purpose of using technology is to facilitate and present information in a simplified manner and not complicate it. Technologies that can be used are handheld devices for digital data collection by aid field officers, mobile phone-based feedback mechanisms to collect feedback from aid recipients, remote sensing with satellites or delivery tracking, and broadcasting with radios and other forms of media²⁴.

Another risk that technology might impose is the level of security that personal data gets. Entities processing personal information should ensure the safety of this information, through their code of conduct and the policies in place on who has access to such information, in addition to encrypting information and reducing the possibility of the data being hacked through using the right firewalls. For this purpose, entities involved in the aid process can use existing technological initiatives such as the tools developed by the International Aid Transparency Initiative (IATI) to track aid progress²⁵.

²³ Jenkins, Matthew, Khaghaghordyan, Aram, Rahman, Kaunain, and Duri, Jorum. *Anti-Corruption Strategies for Development Agencies During the COVID-19 Pandemic*. Transparency International. April 21, 2020. Available at: <https://knowledgehub.transparency.org/helpdesk/anti-corruption-strategies-for-development-agencies-during-the-covid-19-pandemic>

²⁴ Van Beijnum, Mariska, Van Den Berg, Willem, and Van Veen, Erwin. *Between a Rock and a Hard Place: Monitoring Aid Implementation in Situations of Conflict*. CRU Report. Clingendael Netherlands Institute of International Relations. September 2018. Chapter 4. Available at: <https://www.clingendael.org/sites/default/files/2018-09/between-a-rock-and-a-hard-place.pdf>

²⁵ See tools developed by the International Aid Transparency Initiative (IATI) to track aid operations through: <https://iatistandard.org/en/iati-tools-and-resources/>

Publish What You Fund have established four principles related to the transparency of aid; these principles are²⁶:

1. Information on aid should be published proactively;
2. Information on aid should be timely, accessible, and comparable;
3. Everyone has the right to request and receive information about aid; and
4. The right of access to information about aid should be promoted.

If the above principles are respected and enforced, governments, donor organizations, CSOs, and investigative journalists will be able to track aid and ensure that its intended objective(s) are being met and that the aid is serving its purpose in supporting aid recipients efficiently.

Information under the above principles refers to everything related to the aid operation, including but not limited to procurement information, pre-budget statements, Citizen Budget format, and audit reports.

Aid response information should be published on a central platform based on what the response is targeting, to avoid duplication of information and make sure that the public and stakeholders understand the aid operation as a whole in its context not per activity.

Barriers to Aid Transparency

There's the discussion around, as per TI's Handbook mentioned above, "reputational risk vs. open discussion". Organizations may refrain from discussing corruption to avoid any damage to their reputation and ability to raise funds and/or donor sanctioning. On the contrary, however, transparency can have the opposite impact by acting as a preventive measure. Proactive transparent approaches can enhance the organization's credibility amongst donors and the public.

On the other hand, there's the other discussion on "too many vs. too few controls". Transparency is a means to an end and not an end in itself, where it should cover all controls and how they are applied. And even if these controls are too many, which could make staff ignore them all, there should be the right balance of controls depending on the context of each organization and the aid process; these controls should be transparent and have all the relevant information publicly available.

The need for a quick aid response might sometimes lead to loosening the discipline of those providing the aid, which emphasizes on the criticality of adopting transparency in the early stages of the aid response operation. Government, donor organizations, and other private entities should include in their emergency protocols transparency measures that can limit and prevent corrupt practices when the application of these protocols is triggered. Aid response must be contextualized to the place/country the aid is provided; however, it is important to maintain a certain threshold of international best practices within the response plans; especially when it comes to transparency which will allow for a more efficient auditing and/or reporting processes.

²⁶ Publish What You Fund Principles. Publish What You Fund. Available at: <http://www.publishwhatyoufund.org/files/PWYF-Principles.pdf>

Another challenge that might face aid providers is limited resources, which might force aid providers to adopt an exclusion policy for those who should have been targeted with aid. This opens the door wide open for conflict of interest and trading in influence, where high-ranking officials and/or high-ranking employees of aid providers might manipulate the selection criteria of those who will receive aid to fit a specific group or individual(s), though the exclusion of those who are most in need of aid might be unintentional. In any case, maximum transparency here is needed to communicate the selection criteria and the rationale behind it to the public through an effective and efficient outreach plan; this communication must also be at the early stages of the aid response.

Transparency raises the issue of privacy rights of the staff involved and aid recipients on two levels:

- 1) At the internal level within the entity providing the aid, the personal data of aid recipients must be limited to the essential staff who cannot perform their duties – such as due diligence – without having access to personal information; and
- 2) At the external level, the personal data of aid recipients must not be disclosed.

Nonetheless, as an exception to the above, when two or more aid providers are working within the same area and providing the same kind of aid, personal data can be shared to avoid duplication and to help in performing due diligence measures. This sharing of data must also be limited to essential staff who wouldn't be able to perform their tasks without access to such data.

In any case, all those involved in providing aid must adopt privacy policies that adhere to international best practices related to privacy rights. The European General Data Protection Regulation (GDPR) -the most prominent international regulation to protect personal data – can be relied on as a benchmark for protecting privacy rights, through protecting the eight rights guaranteed under the GDPR²⁷:

1. The Right to be Informed;
2. The Right of Access;
3. The Right to Rectification;
4. The Right to Erasure;
5. The Right to Restrict Processing;
6. The Right to Data Portability;
7. The Right to Object; and
8. Rights in relation to automated decision-making and profiling.

²⁷ "What is GDPR, the EU's new data protection law?". GDPR Website. Available at: <https://gdpr.eu/what-is-gdpr/?cn-reloaded=1>

Identifying Corruption Risks

Corruption risks may vary from one country to another or from aid project to another. Such risks are not limited to one aspect of the aid project, but rather can be throughout the lifecycle of the aid provided; designing how/what aid to provide, channeling aid, and disbursing it²⁸. This approach is known as the “Value Chain Analysis”, which comprehensively covers all activities performed to implement an aid program, from designing the aid intervention at the policy level, to the different phases of mobilization of aid and procurement, right until the delivery of aid to recipients²⁹.

When the “Value Chain Analysis” is applied, even when different approaches are adopted at the local level to map or identify corruption risks, there are still three common areas that could include corruption and needs to be mapped and identified. No matter what the approach is, below are the main areas that include corruption risks that need to be addressed³⁰:

1. At the policy level: corruption at this level may occur whether within the government or the private sector. Senior public officials can manipulate donors’ strategies or interventions to benefit themselves and/or those politically affiliated with them, and the same applies to employees at companies and CSOs;
2. At the organizational level: corruption at this level may occur in different areas such as recruitment, procurement, and licensing. Officials and/or employees might have a conflict of interests or exercise trading in influence to hire incompetent relatives and friends or grant them licenses, or embezzle funds during procurement;
3. At the client interface/service delivery level: corruption at this level may occur when interacting with aid recipients, mid-level officials and employees may take bribes to process applications and grant the aid, or they can extort aid recipients, and sexual exploitation may occur here also.

Mapping these corruption risks at the different levels is not enough on its own, after identifying the risks, mitigation measures must be adopted to limit and prevent corrupt practices. At the same time, adopting these measures also is not enough on its own, there needs to be an outreach plan to inform the public, government, donor organizations, and the private entities involved, when it comes to the measures directed at the policy and organizational levels. In addition, a targeted outreach plan is needed to inform aid recipients on the service delivery level about ways to address corrupt practices if they happen to them, such as a grievance mechanism that should consist of external members to the entity providing the aid.

²⁸ International Anti-Corruption Conference (IACC). September 2, 2015. Available at: <https://16iacc.sched.com/event/3YUf/managing-the-risks-designing-and-implementing-corruption-risk-management-systems-in-development-cooperation>

²⁹ Jenkins, Matthew, Chene, Marie, Laberge, Marie, and Loekman, Inda. *Using Governance Data to Fight Corruption Across the SDGs – Handbook for E-Learning Course*. Transparency International. August 30, 2018. Available at: <https://knowledgehub.transparency.org/product/using-governance-data-to-fight-corruption-across-the-sdgs-handbook-for-e-learning-course>

³⁰ dem.

Mapping corruption risks at the different levels of the value chain aims to expand the safeguards against corruption and not limit them to the highly visible corrupt practices, as corruption at the lower levels of the aid process has a more direct impact on the lives of aid recipients³¹.

Due regard is needed when it comes to procurement at the organizational level, as it involves spending aid funds for operational purposes, safeguards to limit and prevent conflict of interest and trading in influence is needed, such as having an independent review mechanism while adopting maximum transparency measures. Information on all bids should be publicly available in addition to information on bidders, and the awarded contract. Such information should include all records held by the entity/department responsible for procurement and published in an open data format, such as value thresholds, terms of payment, delivery and value of the product/service, information on sub-contractors, bid evaluations, beneficial ownership information, relation to any public official or employee, along with information on the institutional setting and the procurement process, grievance mechanism, etc.³².

Procurement entities/departments should have the capacity to apply due diligence measures on bidders and enhanced due diligence measures on bidders with a Politically Exposed Persons (PEPs) status; protocols must be adopted that reduce risks through policies and training, code of conduct, whistleblower policies and vetting procedures³³. Efficient due diligence requires that the above information is available to procurement personnel, in addition to the performance history of bidders, ownership structure, solvency of the bidder based on their balance sheets, and facilities owned/managed by the bidders. Information sharing and coordination between those involved in the aid process are essential here, where procurement entities/departments can establish a debarring list that could serve as a blacklist of suppliers who have been proved to exercise corrupt practices³⁴. Publishing essential information on bidders/contractors while respecting privacy rights is important, whereas in some cases either procurement entities/departments do not have the capacity to apply due diligence measures, or the number of bidders is more than what these entities/departments can handle. Therefore, CSOs and investigative journalists can join forces and provide the necessary support in applying due diligence measures.

31 *Idem*.

32 EuroPAM in-law indicators on Public Procurement. Available at: <http://europam.eu/data/in-law%20indicators/EuroPAM%20Public%20Procurement%20indicator%20list.pdf>

33 See footnote No. 24.

34 See footnote No. 17.

Role of CSOs and Investigative Journalists

CSOs and investigative journalists are one of the main and strongest allies to governments, donor organizations, and aid implementers³⁵. By joining forces, they can provide local and national aid stakeholders with the needed support, whether financial or technical, depending on the context and the capacities of the responsible entities. In addition, CSOs and investigative journalists can play a major role in applying due diligence and enhanced due diligence measures on information collected by aid stakeholders, which can improve the efficiency of aid especially if stakeholders lack capacity and/or financial resources. Also, CSOs can provide a different perspective on the impact of aid on the grassroots level³⁶.

In this direction, relying on CSOs and investigative journalists would allow governments and donors to crowdsource accountability. CSOs, investigative journalists, and even official anti-corruption bodies can act as watchdogs to hold aid implementers to account³⁷. This will require that CSOs and investigative journalists have full access to the aid process documents³⁸ with exceptions regarding privacy rights. In addition, governments or other entities funding and providing aid should publish relevant information on how aid emergency funds have been audited by an external auditor and it should also be accompanied of course by the auditing report³⁹.

Aid Monitoring Index Methodology

To assess the effectiveness and efficiency of the aid channeled to the government and CSOs in Lebanon, the Index relies on best practices as outlined in the previous section of this paper and will be applied to the publicly available information under the 3RF.

Index Structure and Scoring

The index consists of two sections, each section consists of two sub-sections and represents a thematic area that consists of indicators that allows monitoring of the transparency of aid whether in-kind or in-cash: in addition to reconstruction to measure its effectiveness and efficiency, and public and private procurement when relevant. However, due to the fact that no reconstruction operations have been initiated yet, the reconstruction sub-section indicators will not be applied within this paper.

³⁵ *Idem.*

³⁶ *Transcript of International Monetary Fund Managing Director Georgieva's Opening Press Conference. Spring Meetings. International Monetary Fund. April 15, 2020. Available at:*

<https://www.imf.org/en/News/Articles/2020/04/15/tr041520-transcript-of-imf-md-kristalina-georgieva-opening-press-conference-2020-spring-meetings>

³⁷ *See footnote No. 23.*

³⁸ *Idem.*

³⁹ *See footnote No. 23.*

These sections are:

1. Transparency Section (16 indicators):
 - a. In-Cash and In-Kind Aid Sub-Section (8 indicators); and
 - b. Reconstruction Sub-Section (8 indicators)
2. Procurement Section (24 indicators):
 - a. Public Procurement Performed by Public Entities Sub-Section (12 indicators); and
 - b. Private Procurement Performed by Private Entities Sub-Section (12 indicators).

The total number of indicators is 40.

The Index includes another two spaces for: 1) providing notes/comments when applying the indicator on the specified case to highlight the rationale behind the score given, and 2) for providing the electronic source of information.

Scoring is the final space within the Index, a 3-point scoring scale is used as follows:

No. of Points	Model Answer
2	Fully Compliant
1	Partially Compliant
0	Non-Compliant

After scores are provided for each indicator under each sub-section, a total score is provided per section then a total score for the two sections is provided. In each sub-section, the score is transformed into a percentage accompanied with a grade, then the same is provided per section and per the two sub-sections, which will allow the reader to identify where exactly the deficiencies are.

Both, sections and sub-sections, can be used on their own depending on the aid operation being monitored. For example, if the aid operation includes only in-cash and in-kind aid, only the respective sub-section is applied, and its score will be the total score the operation gets. Sub-sections from different sections can also be applied together, for example, if an in-cash and in-kind aid operation includes also private procurement performed by the private entity facilitating the aid, then scores of each sub-section are added together to give the total score of the aid operation.

Grading Scale

Percentage Range	Grade
Score between 81% and 100%	Very Strong
Score between 61% and 80%	Strong
Score between 41% and 60%	Average
Score between 21% and 40%	Weak
Score between 0% and 20%	Very Weak

Limitations

The Index is only limited to assessing the publicly available information on aid and does not assess information that might be held by aid stakeholders internally without publishing them.

The overall score is a general analysis of how aid – in-cash, in-kind, reconstruction, public and private procurement – under each section is performing and doesn't give precedence for any section or indicator over the other; all indicators weigh the same as each one of them is integral to the efficiency of the aid operation.

Aid Transparency Index

Below are the detailed indicators of the Aid Transparency Index with its sections and sub-sections.

Section #1: Transparency

Sub-Section #1: Aid Transparency

Aid Transparency Index; Sub-Section #1: Aid Transparency							
Section	Sub-Section	Indicator	Notes	Source	Score		
Transparency	In-Cash and In-Kind Aid	1. Online Public Availability of information on the source of aid (cash and in-kind)			/2		
		2. Online Public Availability of information on the amount of aid (cash and in-kind)			/2		
		3. Online Public Availability of the objective criteria on who is eligible to receive aid			/2		
		4. Online Public Availability of the objective criteria on who's eligible to facilitate the disbursement of aid			/2		
		5. Online Public Availability of information on how to receive aid			/2		
		6. Online Public Availability of information on independent/external redress and complaint mechanisms			/2		
		7. Online Public Availability of information on what practices are forbidden by the aid facilitators' personnel			/2		
		8. Online Public Availability of information on the operational aspects of aid			/2		
		Sub-Section Total:					/16
		Sub-Section Percentage:					%
Grade:							

Sub-Section #2: Reconstruction Transparency

Aid Transparency Index; Sub-Section #2: Reconstruction Transparency						
Section	Sub-Section	Indicator	Notes	Source	Score	
Transparency	Reconstruction	1. Online Public Availability of pre-budget in reconstruction			/2	
		2. Online Public Availability of the executive budget proposal			/2	
		3. Online Public Availability of the adopted budget			/2	
		4. Online Public Availability of a Citizens Budget			/2	
		5. Online Public Availability of the Budget Cut-Off			/2	
		6. Online Public Availability of In-Year Reports			/2	
		7. Online Public Availability of Mid-Year Report			/2	
		8. Online Public Availability of an internal and external Audit Report			/2	
		Sub-Section Total:				/16
		Sub-Section Percentage:				%
Grade:						

Section #2: Procurement

Sub-Section #1: Public Procurement

Aid Transparency Index; Sub-Section #1: Public Procurement					
Section	Sub-Section	Indicator	Notes	Source	Score
Procurement	Public Procurement Performed by Public Entities	1. Online Public Availability of a minimum contract value threshold that requires the application of tender procurement procedures for goods, services, and works			/2
		2. Online Public Availability of the full tenders' documents			/2
		3. Online Public Availability of Scoring Results			/2
		4. Online Public Availability of procurement documents in a central place			/2
		5. Legal obligation to keep the below records: <ul style="list-style-type: none"> - Public notice of bidding opportunities - Bidding documents and addenda - Bid opening records - Bid evaluation reports - Formal appeals by bidders and outcomes - Final signed contract documents and addenda and amendments - Claims and dispute resolutions - Final payments - Disbursement data (as required by law in Lebanon) 			/2
		6. Legal obligation to make publicly available online information on contractors and subcontractors, including: <ul style="list-style-type: none"> - Verified and accurate beneficial ownership information - Solvency of the entities through periodically updated balance sheets 			/2

Procurement	Public Procurement Performed by Public Entities	7. Availability of preferential treatment encouraging local/national companies			/2	
		8. Availability of restrictions on allowable grounds for tenderer exclusion			/2	
		9. Legal obligation to automatically exclude bids such as the exclusion of the lowest and highest price			/2	
		10. Availability of an evaluation committee with a mandate to prevent conflict of interest			/2	
		11. Legal obligation to specify the location for publicizing open/restricted/negotiated calls			/2	
		12 . Availability of a procurement arbitration court/committee dedicated to public procurement cases			/2	
		Sub-Section Total:				/24
		Sub-Section Percentage:				%
Grade:						

Sub-Section #2: Private Procurement

Aid Transparency Index; Sub-Section #2: Private Procurement					
Section	Sub-Section	Indicator	Notes	Source	Score
Procurement	Private Procurement Performed by Private Entities	1. Online Public Availability of a minimum contract value threshold that requires the application of tender procurement procedures for goods, services, and works			/2
		2. Online Public Availability of the full tenders' documents			/2
		3. Online Public Availability of Scoring Results			/2
		4. Online Public Availability of procurement documents in a central place			/2
		5. Obligation to keep the below records: <ul style="list-style-type: none"> - Public notice of bidding opportunities - Bidding documents and addenda - Bid opening records - Bid evaluation reports - Formal appeals by bidders and outcomes - Final signed contract documents and addenda and amendments - Claims and dispute resolutions - Final payments - Disbursement data (as required by law in Lebanon) 			/2
		6. Obligation to make publicly available online information on contractors and subcontractors, including: <ul style="list-style-type: none"> - Verified and accurate beneficial ownership information - Solvency of the entities through periodically updated balance sheets 			/2

Procurement	Private Procurement Performed by Private Entities	7. Availability of preferential treatment encouraging local/national companies			/2	
		8. Availability of restrictions on allowable grounds for tenderer exclusion			/2	
		9. Obligation to automatically exclude bids such as the exclusion of the lowest and highest price			/2	
		10. Availability of an evaluation committee with a mandate to prevent conflict of interest			/2	
		11. Obligation to specify the location for publicizing open/restricted/negotiated calls			/2	
		12 . Availability of a procurement arbitration committee dedicated to public procurement cases			/2	
		Sub-Section Total:				/24
		Sub-Section Percentage:				%
Grade:						

Case Study: “Building Beirut Businesses Back and Better – B5 Fund”

Under the 3RF project, a Lebanese Financing Facility (LFF) was established to manage the funds channeled through the 3RF. The only publicly available information on an aid operation under the 3RF is on the “Building Beirut Businesses Back and Better – B5 Fund” operation, which aims to “support the recovery of targeted Micro and Small Enterprises (MSEs) damaged by the explosion [Beirut Port Explosion] and to sustain the operations of eligible and selected Microfinance Institutions (MFIs)”⁴⁰.

The B5 operation is a USD 25 million Fund that is financed by the LFF and managed by the World Bank. The total amount of the fund is distributed over three components⁴¹:

1. Component #1: USD 18.5 million grants to MSEs impacted by the Beirut port explosion to support their rehabilitation and recovery;
2. Component #2: USD 5 million grants to MFIs to preserve the microfinance sector and its capacity;
3. Component #3: USD 1.5 million dedicated to fund project management operations and gender support through capacity buildings.

Since the B5 Fund is the only aid operation under the 3RF that has public information available, and since it does not involve any reconstruction activities nor public procurement, only Sub-Section #1 from Section #1 of the Index – In-Cash and In-Kind Aid Transparency indicators –, and the Sub-Section #2 from Section#2 of the Index – Private Procurement indicators – are applied on the B5 Fund as presented in the next section of the paper.

As the applied indicators below show, the B5 Fund have several gaps that could lead to corrupt practices being exercised. Under Section #1 – Sub-Section #2 – the Fund does not provide enough information on the fund itself nor detailed information on the sources of the aid, it only specifies the donor governments/entities. There is also no detailed information on how the \$25 million are aggregated, only that \$18.5 million is dedicated to MSEs, \$5 million dedicated to MFIs, and \$1.5 dedicated to project management costs and capacity building, which could open the door wide open for corrupt practices, especially when it comes to spending the operational costs.

The available information specifies the eligibility criteria for who can benefit from the Fund; however, no information is available on how the aid facilitators were selected. Knowing that Kafalat – a financial institution – is selected to facilitate Component #1, and the Association D’Entraide Professionnelle, Ibdaa Microfinance S.A.L., Al Majmoua, and Vitas are selected to facilitate Component #2.

⁴⁰ Grant Overview. B5 Fund Official Website. Available at: <https://www.kafalatb5.com/grant-overview>

⁴¹ Idem.

The data available provide detailed information on the application process; how those eligible can apply and receive the funds. However, there’s no information on an independent/external grievance mechanism, nor information on the prohibited practices that aid facilitators’ personnel are forbidden from exercising.

There is also no detailed information on the operational aspects of the Fund, it only provides information on the application process, without information on how the Fund is being managed in terms of project management.

Under Section #2 – Sub-Section #2 – the Fund violates every standard there is on aid procurement, providing no information in any way on procurement procedures within the Fund.

Below are the In-Cash and In-Kind Aid Transparency and Private Procurement indicators as applied on the B5 Fund with scoring, rationale behind the scoring, and the supporting link from the official website of the B5 Fund.

A very important observation on the B5 Fund should be noted – which in principle should be a given and that is why it wasn’t included in the Index –, the B5 Fund Platform is only available in English, which poses the question about the extent to which its outreach efforts will serve its purpose in a country where the native language is Arabic. This will certainly limit the Fund’s inclusiveness and will allow for more corrupt practices to happen especially when aid field officers will have to translate the information to potential aid recipients, in addition to limiting the ability of those who are in need of aid to access the Fund’s services and grants.

Below is the overall score the B5 Fund got after applying the relevant sub-sections of the index to it:

<i>In-Cash and In-Kind Aid Transparency (Score, Percentage, Grade)</i>	<i>8/16 - 50% - Average</i>
<i>Private Procurement Transparency (Score, Percentage, Grade)</i>	<i>0/24 – 0% - Very Weak</i>
<i>Index Total</i>	<i>8/40</i>
<i>Percentage</i>	<i>20%</i>
<i>Grade</i>	<i>Very Weak</i>

Aid Monitoring Index					
Section	Sub-Section	Indicator	Notes	Source	Score
Transparency	Aid	1. Online Public Availability of information on the source of aid (cash and in-kind)	The online publicly available information on the B5 Fund specifies the governments and international entities supporting the Lebanese Financing Facility, but without specifying how much each party is providing, which is why the score for this indicator is 1.	https://www.kafalab5.com/g rant-overview	1/2
		2. Online Public Availability of information on the amount of aid (cash and in-kind)	The online publicly available information on the B5 Fund specifies the total amount of funds channeled through it by the LFF at USD 25 million and provides how these USD 25 million are planned to be disbursed at USD 18.5 million for MSEs, USD 5 million to MFIs, and USD 1.5 million to finance project management costs including training and capacity building activities to a targeted audience which is why the score for this indicator is 2.	https://www.kafalab5.com/g rant-overview	2/2
		3. Online Public Availability of the objective criteria on who is eligible to receive aid	The B5 Fund website provides the eligibility criteria for who can benefit from the Fund.	https://www.kafalab5.com/a re-you-eligible	2/2
		4. Online Public Availability of the objective criteria on who's eligible to facilitate the disbursement of aid	The B5 Fund website does not provide information on how the facilitators of the disbursement aid were selected.	https://www.kafalab5.com/home	0/2
		5. Online Public Availability of information on how to receive aid	The B5 Fund website has a dedicated detailed page for the application process to receiving aid.	https://www.kafalab5.com/a pplication-process	2/2
		6. Online Public Availability of information on independent/external redress and complaint mechanisms	No information is available on internal nor external redress mechanisms. However, the website provides three contacts if someone wants to submit a complaint without providing any further information on the process, confidentiality, privacy, and whether the specified personnel is internal or external employees at the B5 Fund or with the aid facilitators.	https://www.kafalab5.com/home	0/2

Transparency	Aid	7. Online Public Availability of information on what practices are forbidden by the aid facilitators' personnel	No information is available on the prohibited practices by aid facilitators' personnel.	https://www.kafalatb5.com/home	0/2
		8. Online Public Availability of information on the operational aspects of aid	Information is only available on how to apply for the aid, where to apply, and a list of required documents, and that MFIs and Kafalat will be screening applications to assess recovery needs without specifying any objective criteria and/or guidelines on this assessment that will be conducted. In addition, no information is available on how the B5 Fund is operating in terms of project management; no aggregation of the USD 1.5 million dedicated to finance the project management costs and capacity building.	https://www.kafalatb5.com/how-it-works	1/2
		Sub-Section Total:			8/16
		Sub-Section Percentage:			50%
		Grade:			Average

Aid Monitoring Index					
Section	Sub-Section	Indicator	Notes	Source	Score
Procurement	Private Procurement by Private Entities	1. Online Public Availability of a minimum contract value threshold that requires the application of tender procurement procedures for goods, services, and works	No information is available on the operational costs of the B5 Fund, only that USD 1.5 million will cover project management, training and capacity-building costs.	https://www.kafalab5.com/home	0/2
		2. Online Public Availability of the full tenders' documents	No information is available on tenders conducted by Kafalat and MFIs within the B5 Fund.	https://www.kafalab5.com/home	0/2
		3. Online Public Availability of Scoring Results	No information is available on the scoring results of tenders conducted by Kafalat and MFIs within the B5 Fund.	https://www.kafalab5.com/home	0/2
		4. Online Public Availability of procurement documents in a central place	No information is available on procurement within the B5 Fund.	https://www.kafalab5.com/home	0/2
		5. Obligation to keep the below records: <ul style="list-style-type: none"> - Public notice of bidding opportunities - Bidding documents and addenda - Bid opening records - Bid evaluation reports - Formal appeals by bidders and outcomes - Final signed contract documents and addenda and amendments - Claims and dispute resolutions - Final payments - Disbursement data (as required by law in Lebanon) 	No information is available on whether such records are available or not.	https://www.kafalab5.com/application-process	0/2

Procurement	Private Procurement by Private Entities	6. Obligation to make publicly available online information on contractors and subcontractors, including: - Verified and accurate beneficial ownership information - Solvency of the entities through periodically updated balance sheets	No information is available on contractors and sub-contractors with Kafalat or the other MFIs.	https://www.kafalatb5.com/home	0/2	
		7. Availability of preferential treatment encouraging local/national companies	No information is available on preferential procurement.	https://www.kafalatb5.com/home	0/2	
		8. Availability of restrictions on allowable grounds for tenderer exclusion	No information is available on the grounds for exclusion from procurement processes.	https://www.kafalatb5.com/home	0/2	
		9. Obligation to automatically exclude bids such as the exclusion of the lowest and highest price	No information is available that specifies if such an obligation exists.	https://www.kafalatb5.com/home	0/2	
		10. Availability of an evaluation committee with a mandate to prevent conflict of interest	No information is available that specifies if such a committee exists.	https://www.kafalatb5.com/home	0/2	
		11. Obligation to specify the location for publicizing open/restricted/negotiated calls	No information is available that specifies if such an obligation exists.	https://www.kafalatb5.com/home	0/2	
		12. Availability of a procurement arbitration committee dedicated to public procurement cases	No information is available on whether such a committee exists or not.	https://www.kafalatb5.com/home	0/2	
		Sub-Section Total:				0/24
		Sub-Section Percentage:				0%
		Grade:				Very Weak

<i>Index Total:</i>	8/40
<i>Percentage:</i>	20%
<i>Grade:</i>	Very Weak

Conclusions and Recommendations

As mentioned before, the 3RF is the framework within which the global community is providing aid to Lebanon in response to the Beirut port explosion. There is not much information on the framework available to the public, in fact, the only available information is on the B5 Fund and the 3RF as an independent framework that does not have a dedicated platform providing information to the public. The available information is mostly in English, which could exclude many people from understanding how to benefit from the Framework or at least allows for corrupt practices by aid field officers when they translate information to aid recipients.

The B5 Fund score is very weak on the Index where it shows where the gaps are and at the same time points to the strong positions of the Fund. This requires immediate action from the World Bank – who is managing the Fund – and the aid facilitators to make sure that the Fund is as transparent as possible which will improve accountability, improve service delivery and, therefore, satisfy the objective(s) of providing aid.

To do that, the below recommendations are essential to limit and prevent corrupt practices within aid operations under the 3RF.

1. Make all information available in Arabic regardless of what other languages might be available.
2. Establish an independent platform for the 3RF.
3. Make all the information required under the Index provided in this paper publicly available, including information on aid, reconstruction, in addition to public and private procurement.