



CENTRAL INSPECTION
التفتيش المركزي

THE ROLE OF THE CENTRAL INSPECTION BUREAU IN COMBATTING CORRUPTION

*In Light of the Complaints Filed to the
Lebanese Advocacy and Legal Advice Center (LALAC)*

THE LEBANESE
TRANSPARENCY
ASSOCIATION



NO CORRUPTION



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the global coalition against corruption

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ABSTRACT

In line with Lebanon's efforts to combat and reduce corruption in the public sector, the Central Inspection Bureau assumes a key role in achieving positive results on this end, in cooperation with civil society organizations. To understand the CIB's role, this report will start by outlining the concept of fighting corruption within the public sector, before presenting the CIB's powers in ensuring that all public entities comply with the laws and regulations in force. The paper will then focus on corruption complaints filed to the Lebanese Advocacy and Legal Advice Center (LALAC) and on the role of the Central Inspection in addressing them. The report will conclude with a series of recommendations to the Lebanese Parliament and Council of Ministers, as well as to the CIB, given their key role in facilitating inspections, promoting their transparency, and building and maintaining citizens' trust in the Lebanese government and its institutions.



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The Role of the Central Inspection Bureau in Combatting Corruption

In Light of the Complaints Filed to the Lebanese Advocacy and Legal Advice Center (LALAC)

INTRODUCTION

Corruption in the public sector is prevalent in different forms within the administrative and financial domains. Article 1 (a) of Law No. 175/2020 on Combatting Corruption in the Public Sector and the Establishment of the National Anti-corruption Commission, defines corruption as follows:

"The abuse of power, function, or work linked to public funds for the direct or indirect illicit gains or benefits for personal interests or those of others, directly or indirectly.

Acts of corruption include Crimes Against Public Administration provided for in Chapter I of Section Three of Book II of the Penal Code with the exception of Subsection 4, illicit enrichment, and acts of corruption falling under international conventions and treaties to which Lebanon is or will party, which addresses combatting corruption".

The crimes against Public Administration mentioned in the Penal Code are bribery, abuse of influence, embezzlement, abuse of power, and breach of duty.

At the international level, there is no uniform definition of corruption, however, Transparency International defines it as "the abuse of power for private gain¹."

Irrespective of the definition of corruption and classification of corruption crimes, corruption is a scourge that significantly hinders countries' progress, as it entails a violation of legal provisions by the very people entrusted to enforce them. Taking away much needed resources for development to fulfill the rights of citizens, exacerbating inequality, corruption weakens the accountability structures which are responsible for protecting human rights and enhances the culture of impunity leading to the unpunishment of illegal actions, diverting accountability, and frustrating redress, with laws not being consistently upheld².

As such, all public institutions are bound by their statutes and bylaws. The latter generally establish strict rules to curb corruption and subject corrupt individuals to criminal and civil prosecution and disciplinary sanctions.

Corruption offenses, committed individually or methodologically, take a significant toll on the efficiency of a public institution in managing public services and fulfilling citizens' and residents' rights to receive them.

Hence, when corruption propagates within a public institution, it not only affects the administrative process but society as a whole. If corruption becomes systematic, it turns into a phenomenon to which we adapt to, often forgetting its detrimental consequences on the

¹ *What is corruption? Transparency International's website. Available in English:*

<https://www.transparency.org/en/what-is-corruption>

² *The Negative Impact of Corruption on the Enjoyment of Human Rights. OHCHR. Available at:*

<https://www.ohchr.org/Documents/HRBodies/HRCouncil/AdvisoryCom/Corruption/OHCHR.pdf>

public institution which is in charge of organizing citizens and residents' affairs. Additionally, corruption manifests disadvantageously on the economic level. In fact, corruption in the public sector drives away investors and hinders competition between companies, causing monopolization which leads to a drop in the quality of services, and a spike in prices. Such outcomes put citizens and residents at direct risk, and weigh on the government's public finances.

In fighting against corruption, governments have enacted laws to punish corruption offenses in the public sector and have established various bodies to ensure their enforcement. However, these measures only complement other regulations that ensure the proper functioning of public institutions. To this end, governments usually establish a central administration tasked with monitoring the performance of civil servants and ensuring compliance with applicable laws and regulations. In the event where these laws and regulations are violated or infringed, the institution in question may impose legal sanctions against the concerned employees.

In Lebanon, the Central Inspection Bureau (CIB) exercises authority over public administrations and institutions, independent authorities, municipalities, and their officials through monitoring these institutions and seeking to improve administrative processes to boost their productivity and efficiency. In accordance with its establishing regulation, the CIB seeks to fight corruption through periodic inspection, and by receiving complaints from citizens, residents, and/or affected persons. Civil Society Organizations (CSOs) also launched several initiatives to promote transparency and accountability in the public sector. The Lebanese Transparency Associations established the Lebanese Advocacy and Legal Advice Center (Center or LALAC) in 2009, as part of the global movement under Transparency International which operates around sixty similar centers across the world. The Center receives complaints from victims of corruption and seeks to assist them with free legal advice.

This paper will outline the CIB's jurisdiction, along with the complaints of corruption offenses received by LALAC. Then, the paper will conclude with a series of recommendations that can be implemented by the Lebanese government and the CIB to curb corruption, streamline public administration, and bolster productivity and efficiency.

JURISDICTION OF THE CENTRAL INSPECTION BUREAU

The CIB enjoys broad jurisdiction over public administrations to ensure their proper and effective operation to ensure that public services are as efficient as possible. The CIB consists of several administrative layers, with each layer having its own competences. These competences will be outlined below, but before that it is important to highlight what public administrations fall under the CIB's jurisdiction.

Public Administrations falling under the Central Inspection's Mandate

Article 1 of Legislative Decree no. 115/1959 (Establishment of the Central Inspection Bureau) specified the administrations and institutions that fall under the mandate of the CIB in general, where it states:

"A Central Inspection Bureau has been established under the Presidency of the Council of Ministers. Its mandate covers all public administrations and institutions, independent authorities and municipalities, as well as all permanent and temporary employees, workers, wage earners and contractors therein, and all those who receive a wage or salary from their funds, in accordance with the provisions of the laws applicable to them.

The government may issue a decree expanding the mandate of the Central Inspection Bureau to include, permanently or temporarily, all institutions that are subject to the oversight of the Court of Accounts.

The judiciary, the Lebanese Army, the Internal Security Forces, and the General Security are subject to the oversight of the Central Inspection Bureau on the financial level exclusively, and in line with the terms and conditions of their own regulations³".

According to the abovementioned Article, all Lebanese public administrations and institutions fall under the CIB's jurisdiction; even though some are only subject to its jurisdiction on the financial level, the CIB may exercise its powers over these administrations as stated by the law.

Functions of the Central Inspection Bureau

Article 2 of the same decree specifies the CIB's main functions which consist of monitoring municipalities and public administrations and institutions, enhancing administrative processes, providing solicited and unsolicited advice to administrative authorities, coordinating joint actions involving several public administrations, and undertaking studies, inquiries, and activities commissioned by the relevant authorities.

Central Inspection Bureau Board's Mandate

In Chapter III of the Legislative Decree, Article 11 defines the mandate of the CIB's Board in charge of discussing and reporting on matters provided for by the applicable laws and regulations or commissioned by the Chief Inspector, some of which are specific to the Central Inspection such as:

- a. submitting proposals to the Council of Ministers to modify the CIB's staffing;
- b. outlining the mandate of positions related to the CIB;
- c. preparing the CIB's budget;
- d. approving the appointment of CIB's employees who may be appointed by virtue of a decision issued by the President of the CIB, in line with the provisions of paragraph 1 of Article 8;
- e. referring general and associate inspectors to the Disciplinary Board;

³* Legislative Decree | No. 115 of 12/06/1959, Establishment of the Central Inspection. Available via: <http://www.legallaw.ul.edu.lb/Law.aspx?lawId=244295>

- f. accepting contracts with Lebanese or foreign experts within the limits of budgetary allocations;
- g. dealing with all key affairs pertaining to different CIB's bodies⁴.

Additionally, paragraph 1 of Article 8 explicitly states that the President of the CIB shall have a permanent delegation to exercise the financial and administrative powers legally entrusted to a Minister, with the exception of constitutional mandate.

As for issues pertaining to public administrations and institutions, the CIB Board is in charge of submitting proposals to the Council of Ministers regarding reorganizing of municipalities and public administrations and enhancing their processes. The CIB role in developing the administrative system and its processes is crucial, particularly in regard to automating administrative operations. This saves both the administration and applicants time and improves services, thus making the administration more efficient. To this end, applicable laws and regulations stipulating paper-based operations must be amended to keep pace with technological development and capitalize on it to enhance administrative processes.

According to Article 11, the CIB Board may decide on all annual inspection programs at any public entity falling under its authority. It may also decide on the measures taken against employees proven guilty in light of the inspection, as well as other issues provided for by other laws and which fall under the Board's mandate. This set of powers is considered complementary to the aforementioned, in regard to enhancing administrative processes in Public Administrations, as this requires a comprehensive and integrated plan to make sure the CIB plans for the administrations under its mandate are efficient.

The outlined mandate of the CIB Board, if exercised efficiently, can play a major role in limiting and preventing corruption in administrations subject to the CIB's authority. As the mandate allows the CIB Board to develop the mechanisms and procedures of the operations conducted by administrations; for example, the CIB can work on digitizing administrations in an attempt to limit interaction between public employees and those who interact with them. The automation of administrative transactions can prevent bribery, as it limits the role of public employees' discretion in deciding on administrative matters.

Central Inspection Bureau's Jurisdiction

According to Article 12 of the Legislative Decree establishing the CIB, the Central Inspection Bureau's jurisdiction includes the following:

- a. Monitoring and inspecting public administrations and municipalities in the performance of their duties, as well as public institutions, in accordance with the conditions stipulated in their regulations.

⁴ See Reference No. 3, Article 11, Board Mandate, Chapter III - Central Inspection Board.

- b. Monitoring the employees of public administrations and municipalities in the performance of their duties, as well as employees of public institutions, in accordance with the conditions stipulated in their regulations.
- c. Carrying out inspections on an annual and extraordinary basis and upon request.

Annual inspection timelines are established in December of each year, in consultation with public administrations, institutions, and municipalities. These timelines must cover all public administrations, institutions, and municipalities which must be inspected at least once a year. Extraordinary timelines are also set when necessary.

Inspection assignments are issued by the President of the Board in all cases, by the president of the Civil Service Council when the matter under inspection is linked to a civil servant, by the Head of the Court of Accounts or the Prosecutor when the matter under inspection is of financial nature, and by the Minister or the Director General when the inspection falls within their scope of competence.

The mandate given to the CIB includes all public administrations and their staff. It facilitates its intervention in any incident or issue that may arise in any administration, whether it be mismanagement, squandering, or corruption. If annual and/or extraordinary inspections fail to identify a particular problem, the CIB can commission one of its specific inspection departments to carry out the necessary inspection and resolve the problem.

The Jurisdiction of the President of the Central Inspection Bureau

Article 15 of the aforementioned decree states the jurisdiction of the President of the CIB as follows:

- a. setting up annual or extraordinary inspection timelines, in accordance with the provisions of paragraph 4 of Article 12;
- b. issuing the special commissions outlined in paragraph 6 of Article 12 and ensuring their implementation by the relevant authorities;
- c. establishing inspection committees whose members shall be selected from a pool of the general inspectors and inspectors, while outlining their mission and the period during which they shall perform their tasks, provided it does not exceed three months, subject to a three-month extension based on the Board's decision;
- d. conducting investigations and inspections with first-grade public employees and both members of the Board in person;
- e. submitting inspection reports and discussing them with the Board; and
- f. monitoring the implementation of the CIB Board's proposals.

As mentioned, the CIB mandate covers municipalities, public administrations, and institutions and thus plays a key role in promoting integrity and enhancing the administrative system. A quick look at the President's powers reveals that their role is by far the most significant.

The President of the CIB has all the powers necessary to ensure the integrity of the inspection. As such, the President is considered the main protagonist for achieving public administration reform and fighting corruption. In fact, in addition to setting annual inspection timelines, the President may also set up exceptional inspection programs. For example, if an urgent issue becomes prevalent affecting an entire administration, after the annual program has been approved, The President can set up an exceptional inspection program for it. The same applies to any special commissions that the President might decide on; for instance, when a person files a complaint against a particular employee or department, the President may assign inspectors to specifically look into the complaint.

The President of the CIB is also in charge of establishing Inspection Committees, selecting members, outlining their tasks, and setting the duration of their mandate for a maximum period of three months, subject to renewal by virtue of a Board decision.

Furthermore, the President shall personally conduct investigations and inspections with first-grade employees, alongside members of the Board. On another note, the President reviews inspection reports before submitting them to the Inspection Board; They also can follow up on the drafting and implementation of proposals issued by the CIB Board.

Inspectors' Mandate

Article 16 of the Decree, amended by Legislative Decree No. 64/15317, specifies Inspectors' mandate as follows:

- a. General Inspectors and Inspectors may access all documents from the administration under inspection and get copies thereof; they may also check the administration's assets and everything falling under its mandate.

With respect to confidential matters, they access it and conduct an investigation but cannot obtain copies of the documents, unless they are given special authorization from the Prime Minister following the approval of the relevant minister.

- b. They may ask employees questions and call whomever they deem a crucial element for the inspection for a testimony; In the event an employee abstains from responding or obstructs the inspection, the Inspector shall draw up a report to that effect and submit it to the administration's director. The inspector's report shall propose the recommended measures to be taken against the employee in question. The relevant administration may then decide on the matter within 24 hours.
- c. Inspectors may also assign employees to work outside official working hours, suspend granting leaves during the inspection process, and take all preventive measures required to ensure the integrity of the investigation, such as temporary work suspension, while notifying the relevant Minister to decide on the matter, and notify the President of the CIB accordingly.

- d. Inspectors may collect information verbally or in writing, if necessary, from individuals and private institutions.
- e. Inspectors may seek the assistance of experts in matters that require technical knowledge, with the approval of the President of the CIB who assigns the experts themselves and determines their compensation within the limits of the relevant budget allocations.
- f. General Inspectors may impose sanctions on second-grade employees and below, in case of witnessed violations or the obstruction of the inspection.

These sanctions are outlined in Article 55 of the Public Employees System⁵:

Disciplinary Sanctions, on two levels:

First Level:

- 1- Reprimands
- 2- Salary deduction for 15 days at most
- 3- Delaying promotion for 6 months at most.

Second Level:

- 1- Delaying promotion for 30 months at most.
- 2- Unpaid discontinuation of work for a period not exceeding 6 months.
- 3- Demotion to a lower grade or more within the same rank.
- 4- Demotion.
- 5- Termination of service.
- 6- Dismissing.

The powers of General Inspectors and Inspectors also include temporary employees, contractual staff, and wage earners in public administrations, and anyone who receives a salary or wage from their funds, within the limits of the penalties stipulated in the laws and regulations governing them. They also include permanent and temporary employees, contractual staff, and wage earners working in public institutions, independent authorities, and municipalities, and anyone who receives a salary or wage from their funds, within the limits of the penalties stipulated in the laws and regulations governing them.

If the abovementioned laws and regulations do not provide for disciplinary sanctions, the series of sanctions outlined in Article 55 of the Public Employees System are applied. In this case, the General Inspector or Inspector may solicit the opinion of the employee's line supervisor regarding the penalty they intend to impose thereon.

⁵ Article 55, Disciplinary Sanctions, Public Employees System, Lebanese University – Center for Research and Studies in Legal Informatics,
<http://www.legallaw.ul.edu.lb/LawArticles.aspx?LawArticleID=1048971&lawId=179571>

The line supervisor shall express their opinion regarding the proposed penalty in writing within 24 hours; otherwise, their opinion is dismissed and the Inspector General or Inspector may duly proceed.

Article 4 of Decree No. 2862/59 (Inspection Proceedings)⁶ states that the powers granted to Inspectors shall be restricted to their respective departments and branches. Moreover, non-administrative Inspectors, when investigating technical issues, may inspect administrative issues that are not directly linked to the technical investigation. However, every Inspector who discovers a violation in another department or branch has the right to conduct preliminary investigations until the competent inspector takes over.

After this brief presentation of the powers and functions of the CIB Board, , Bureau, President, General Inspectors, and Inspectors, it is worth stressing that the CIB has the necessary legal tools to carry out effective inspections, thus reducing administrative violations that could obstruct the provision of services to beneficiaries across municipalities, public administrations, and institutions. However, these legal tools must be enhanced to keep pace with current developments, particularly in terms of the technological evolution and capitalizing on it to develop public administrations and the services they provide to citizens and residents.

A draft law to amend the CIB legal system is currently being deliberated in Parliament for this purpose. However, this paper will not address this issue as it requires in-depth and comprehensive research of all its articles, in comparison with the constitutional principles that govern the Lebanese administrative system. It also requires a thorough observation of key best practices in different countries, to be taken into account when improving the Lebanese Public Administration system.

The current CIB Board has realized the importance of utilizing the technological evolution in the relationship between citizens and residents on the one hand, and the CIB on the other hand. It has dedicated a special section on its website through which citizens and individuals can submit complaints and report any violations they are exposed to in public entities; the CIB then takes over to process these complaints and issue the necessary proceedings⁷.

⁶Decree No. 2862 of 16/12/1959, *Inspection Fundamentals*. Available on:

<http://www.cib.gov.lb/ar/%D8%A3%D8%B5%D9%88%D9%84-%D8%A7%D9%84%D8%AA%D9%81%D8%AA%D9%8A%D8%B4>

⁷Complaints Section on the Central Inspection Board website: <http://www.cib.gov.lb/ar>

Central Inspection Bureau	
CIB Department	Function(s)
President of the CIB	Oversees the work of the CIB, and distributes functions for CIB Board members, prepares the annual report of CIB, prepares annual inspection programs, assigns inspection committees with their mission, investigates personally with public employees of the first degree.
Board of the CIB	Provide recommendations to the Council of Ministers to amend the CIB's staffing, assigns functions related to the CIB, prepares the CIB budget, approve the appointment of the CIB's employees, refers general inspector and inspectors to the Disciplinary Council, approves contracting with Lebanese and foreign experts in accordance with the CIB's budget, providing opinions and recommendations to the Council of Ministers on restructuring public administrations, institutions and municipalities, and on developing administrative procedures, approve annual inspection programs, approve sanctioning public employees decided by the CIB.
Inspectors	<p>a. General Inspectors and Inspectors may access all documents from the administration under inspection and get copies thereof; they may also check the administration's assets and everything falling under its mandate.</p> <p>With respect to confidential matters, they access it and conduct an investigation but cannot obtain copies of the documents, unless they are given special authorization from the Prime Minister following the approval of the relevant minister.</p> <p>b. They may ask employees questions and call whomever they deem a crucial element for the inspection for a testimony; In the event an employee abstains from responding or obstructs the inspection, the Inspector shall draw up a report to that effect and submit it to the administration's director. The inspector's report shall propose the recommended measures to be taken against the employee in question. The relevant administration may then decide on the matter within 24 hours.</p>

6*Decree No. 2862 of 16/12/1959, *Inspection Fundamentals*. Available on:

<http://www.cib.gov.lb/ar/%D8%A3%D8%B5%D9%88%D9%84-%D8%A7%D9%84%D8%AA%D9%81%D8%AA%D9%8A%D8%B4>

7*Complaints Section on the Central Inspection Board website: <http://www.cib.gov.lb/ar>

	<p>c. Inspectors may also assign employees to work outside official working hours, suspend granting leaves during the inspection process, and take all preventive measures required to ensure the integrity of the investigation, such as temporary work suspension, while notifying the relevant Minister to decide on the matter, and notify the President of the CIB accordingly.</p> <p>d. Inspectors may collect information verbally or in writing, if necessary, from individuals and private institutions.</p> <p>e. Inspectors may seek the assistance of experts in matters that require technical knowledge, with the approval of the President of the CIB who assigns the experts themselves and determines their compensation within the limits of the relevant budget allocations.</p> <p>f. General Inspectors may impose sanctions on second-grade employees and below, in case of witnessed violations or the obstruction of the inspection.</p>
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COMPLAINTS ABOUT CORRUPTION OFFENSES FILED TO THE LEBANESE ADVOCACY AND LEGAL ADVICE CENTER (LALAC)

In 2009, the Lebanese Transparency Association – No Corruption; Transparency International’s National Chapter, launched the Lebanese Advocacy and Legal Advice Center (LALAC), reproducing the model created by Transparency International and implemented in more than sixty countries around the world⁸. The Center aims to provide residents of Lebanon, whether Lebanese or non-Lebanese, with the necessary information regarding their legal rights through free legal advice, and to encourage them to take action against cases of corruption that they witnessed or were victims of and that affect the public good.

In this context, the Center constantly receives complaints about various forms of corruption affecting citizens and residents in the public administrations. To guarantee the complainants’ privacy, the Center deals with their personal information with great confidentiality, so that only a few employees working closely with the complainants have access to it. A complainant can call the Center’s number, they can withhold their identity if they wish, and if they provide their identity, it will be dealt with absolute confidentiality, unless explicitly said otherwise. The Center’s team responsible for receiving complaints are trained to protect personal information and will not share the identity of the complainant unless they allow it or there was a court order.

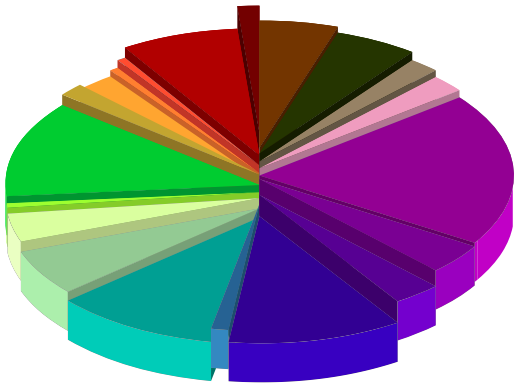
8 For statistics and information on Transparency International’s Advocacy and Legal Advice Centers you can visit: <https://www.transparency.org/en/alacs>*

LALAC received multiple complaints related to cases of corruption in various public entities. From January 2020 to August 2020, the Center received 171 complaints concerning different ministries and sectors.

Presented below are the complaints that are directly related to public employees, and those related to certain officials functions at public entities that require its employees to act in relation to the submitted complaints, which fall under the jurisdiction of the CIB.

171 Complaint Received by the Lebanese Advocacy and Legal Advice Center (LALAC) from January 2020 till August 2020

Complaints related to	Complaints & Percentage	
The banking sector	09	5.30%
Real estate	09	5.30%
Bribery	03	1.80%
The execution of contracts and paying in Lebanese Pound or US Dollars	04	2.30%
The Ministry of Economy and Trade	33	19.30%
The Ministry of Energy and Water	07	4.10%
The Ministry of Interior and Municipalities	05	2.90%
Hospitals and the health sector	19	11.10%
The National Social Security Fund	02	1.20%
Requesting in-kind and in-cash aid	18	10.50%
Corruption in municipalities	10	5.80%
The judicial sector	06	3.50%
Religious courts	01	0.60%
Private sector	21	12.3%
Employment	03	1.80%
The Ministry of Social Affairs	04	2.30%
The Ministry of Public Works and Transportation	01	0.60%
The Ministry of Tourism	01	0.60%
The Beirut port blast	13	7.60%
International organizations	02	1.20%



Surprisingly, the largest number of complaints (fifty complaints in total) addressed problems that should be resolved by the Ministry of Economy and Trade. These complaints included issues related to high prices of goods and counterfeit goods in the market, others addressed the pricing of subscriptions to private electric generators; these are among the daily issues that directly affect the lives of citizens and individuals. It is handled by the Consumer Protection Directorate, whose officials should monitor market prices periodically; the role of the CIB is highlighted in such cases whereas it must determine the reason why the Directorate would not address the issues. If the problem is due to the negligence of the relevant public employees, the appropriate sanctions should be imposed on officials according to the laws and regulations in force; if the lack of human and/or technical resources was the main problem, the CIB can work on improving the methods applied in cooperation with the Directorate for better use of the available resources and for the development of plans that would determine the Directorate's relevant needs.

One of the other complaints pertained to a trespassing incident on public property after someone had placed a kiosk on the edge of a road causing a remarkable traffic jam. Municipalities are the competent authorities responsible for addressing these problems and removing the kiosk in coordination with the Ministry of Interior and Municipalities.

However, even though the complainant followed up on the issue with the municipality, the offense was not addressed. The CIB has the jurisdiction, in this case, to identify the reason why the concerned municipality did not respond to this complaint, and impose the legally required sanction against the public employee in charge of this task at the municipality.

The Center has also received several behavioral complaints on public employees at the Ministry of Social Affairs; the CIB also have the jurisdiction to impose necessary disciplinary sanctions against the concerned employees. The Center received two other complaints about placing containers in front of a house on the coast, the owner of the house had filed a complaint at the Ministry of Public Works and Transport, but nothing happened even though they followed up on the issue. In this situation, the CIB may also intervene to investigate the reason for not resolving the issue related to the complaint and take necessary measures against public employees not fulfilling their duties.

Several other complaints on bribery were also submitted, as the complainants had to illegally pay an amount of money to an official to get their transactions done at the Department of Finance. Bribery is the most obvious form of corruption in Lebanese Public Administrations, and the CIB has a great responsibility to confront this scourge and eliminate it through periodic inspection, resolving and following up on complaints received directly from people dealing with the public entities, and through paving the way for cooperation with civil initiatives such as LALAC and others to curb this phenomenon and other forms of corruption in the public sector.

Due to the lack of trust by Lebanese citizens in the government and its agencies, there are no known bribery cases at the CIB in 2020, nonetheless, bribery is not just systematic in public administrations but also a cultural behavior. Which might be one of the reasons why no complaints were filed to the CIB in 2020 on bribery. On the other hand, some complaints were filed to LALAC, which showcases the importance of having a constructive relation between the CIB and civil initiatives whether through MOU's or informal cooperation, the CIB can rely on civil initiatives as both, a source of information for analysis and planning the development of public administrations and to exercise its jurisdiction in identifying and imposing sanctions as prescribed by law on corrupt public employees.

RECOMMENDATIONS

There is no doubt that the CIB plays a key role in combatting and limiting corruption in the public sector, as the inspection work is essential in the process of gaining and maintaining citizens' trust in the government and its agencies by adopting the highest transparency standards in the work of the CIB. However, this requires some legislative and executive steps from the Lebanese government, particularly from the Parliament and the CIB itself. The following are the suggested recommendations for the Parliament and the Council of Ministers on the one hand, and the CIB on the other:

Proposed recommendations to both the Parliament and the Council of Ministers

Developing the Lebanese Administrative System through:

- Adopting a clear policy for archiving records, documents, and transactions of public entities by converting administrative archives into electronic and/or digital archives.
- Automating/Mechanization of administrative processes and documents to facilitate the inspection process.

Proposed recommendations to the Central Inspection Bureau:

- Adopting and implementing a public relations policy, built on transparency in the implementation of inspection work and its outputs, including reports, studies, recommendations, etc.
- Widely advertising for the complaint's mechanism adopted by the CIB, to ensure that the public is aware of it and how to utilize it.
- Cooperating with CSOs, especially those that receive corruption complaints from the public, as they are able support and enhance CIB work, through Memorandums of Understanding that clearly and explicitly define cooperation mechanisms; for example, adopting the outputs of corruption indicators conducted by CSOs as a starting point for developing public administrations.
- Developing the skills of General Inspectors and Inspectors through ongoing training on inspection best practices.
- Conducting risk assessment studies on the Lebanese public entities and proposing solutions and recommendations to that end.
- Periodically assessing and measuring to what extent public entities implement the CIB recommendations.