

Building Integrity and National Accountability in Lebanon (BINA')

MANAGEMENT RESPONSE TO BINA' PROJECT FINAL EVALUATION REPORT

APRIL 2026

INTRODUCTION

This management response accompanies the final evaluation of Building Integrity and National Accountability in Lebanon (BINA'), an EU-funded project implemented between 2022 and 2025 by Transparency International Secretariat (TI-S), Transparency International Lebanon (TI-LB), and the Lebanese Center for Policy Studies (LCPS). The evaluation was commissioned to provide an independent assessment of the project's performance, with a focus on impact and sustainability, while generating actionable learning to inform future programming in complex and fragile contexts.

The final evaluation of BINA' was conducted by an independent external evaluator, Research & Professional Services (RPS) MENA, a social impact consulting, training, and research firm with a track record in independent evaluations, impact assessments, and research studies for civil society, international organisations, donor agencies, and multilateral institutions across the MENA region. RPS MENA maintains offices in Beirut, which enabled the team to conduct in-person meetings in Lebanon.

The evaluation was carried out between October and November 2025, with the final report completed in December 2025. It assessed the project against OECD DAC criteria, including relevance, coherence, effectiveness, efficiency, impact, and sustainability, with innovation examined as a cross-cutting dimension. It applied a mixed-methods design grounded in contribution analysis and outcome harvesting, drawing on a robust evidence base. Data collection included surveys with twenty-one civil society organisations (CSOs), fifteen citizens, and three municipalities, as well as seventeen key informant interviews (KIIs) with the BINA' team, European Union (EU) representatives involved in the structured dialogue, the Lebanon Reform, Recovery, and Reconstruction Framework (3RF) actors, the donor, and national oversight bodies. This was complemented by document review and an outcome harvesting workshop. The evaluation covered all major components of the project, including sub-granting, capacity strengthening, advocacy, and structured dialogue mechanisms.

TI-S agrees with the evaluation's overall conclusions and considers it a fair and evidence-based assessment of the project's performance, results, and limitations. The findings provide a basis for accountability to the donor and inform the design of future initiatives by TI-S and its partners.

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RESPONSE TO FINDINGS

- **Synopsis**

TI-S agrees with the evaluation's overall findings and conclusions. The assessment accurately reflects the project's strong performance across all criteria despite operating in a highly volatile context that required continuous adaptation of delivery modalities. TI-S considers the findings to be well substantiated and reflective of project implementation experience. Innovation is correctly identified as a key cross-cutting enabler of results.

- **Relevance**

TI-S agrees with the evaluation's finding that BINA' maintained strong relevance throughout implementation. This was achieved through continuous recalibration of priorities based on evolving

governance challenges and reform dynamics, rather than adherence to fixed plans. Adjustments to the sub-granting approach and the shift away from direct municipal engagement reflect appropriate responses to contextual constraints while preserving alignment with reform processes and civil society needs.

- **Coherence**

TI-S agrees with the evaluation's finding that BINA' demonstrated strong coherence within the governance ecosystem. This was supported by adjustments to engagement modalities, including the establishment of a structured EU–CSO dialogue, which improved alignment and reduced fragmentation among stakeholders. Strong coordination within the consortium further ensured consistent implementation and adaptation.

- **Effectiveness**

TI-S agrees with the evaluation's finding that BINA' achieved strong effectiveness across planned and emerging results. This was largely driven by the sub-granting model, which enabled decentralised and flexible delivery. The evaluation appropriately reflects results across organisational, policy, and institutional levels, while recognising that institutional changes remain incremental due to contextual constraints.

- **Efficiency**

TI-S agrees with the evaluation's finding that BINA' achieved strong efficiency and value for money despite operating constraints. Efficiency gains were supported by adaptive delivery approaches, including the use of digital modalities and continuous reallocation of resources in response to changing conditions. The constraints identified, particularly related to staffing and coordination demands, are accurately reflected.

- **Impact**

TI-S agrees with the evaluation's assessment that impact is visible at policy, behavioural, and institutional levels. The project's delivery model enabled multiple actors to operate in parallel, contributing to results beyond what could have been achieved through centralised implementation. The evaluation appropriately captures both the breadth of these contributions and the limitations imposed by the broader operating environment.

- **Sustainability**

TI-S agrees with the evaluation's finding that sustainability prospects are strong but remain conditional on external factors, particularly political space, institutional willingness, and continued funding. The project has prioritised strengthening capacities, networks, and tools, which provide a basis for continued engagement when conditions allow. At the same time, structural constraints affecting public institutions and CSOs limit the extent to which results can be sustained without continued support.

- **Innovation**

TI-S agrees with the evaluation's finding that innovation was a strong cross-cutting feature of BINA'. Innovation was embedded in the delivery model, particularly through the sub-granting approach, which enabled testing and adaptation of different tools and engagement models. The evaluation correctly highlights the project's ability to adjust delivery modalities and respond to changing conditions while maintaining its core objectives.

RESPONSE TO RECOMMENDATIONS

Recommendations addressed to the BINA’ consortium are accepted or partially accepted and will be taken forward, where applicable, in future governance and anti-corruption programming in Lebanon and in comparable fragile contexts, subject to mandate, feasibility, and resources.

Recommendations addressed to external stakeholders, including the European Union and national actors, fall outside the consortium’s direct responsibility. These have been shared with the relevant stakeholders as appropriate and are presented in the “Annex: Evaluation Conclusion and Recommendations by Stakeholder Level” for completeness.

The responses below set out the consortium’s position on the recommendations addressed to BINA’, indicating agreement and clarifying scope, feasibility, and conditions for follow-up.

Specific recommendations for TI-S

<p><i>Recommendation</i></p> <p>1.2. Institutionalizing Adaptive Management Practices:</p> <ul style="list-style-type: none"> • Systematically document crisis-time adaptive measures undertaken by TI-S, such as managing currency exchange risks (e.g., disbursing payments in USD while receiving funds in EUR) and introducing flexibility in project amendments, to inform future operational decision-making 	<p><i>Accepted</i></p>
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Throughout BINA’, adaptive management was applied in response to concrete disruptions, including inflation, security escalation, and institutional constraints. Measures such as re-sequencing activities, renegotiating research costs, shifting data collection and capacity building online, and introducing direct awards enabled continued delivery where initial implementation assumptions no longer held.

While these adaptations were discussed and implemented at management level, they were not always systematically documented. Strengthening the structured capture of decision rationales, triggers, and trade-offs would support organisational learning and improve replication in similarly volatile contexts.

TI-S has already developed internal guidance on sub-granting. Building on this, TI-S will further systematise the documentation of adaptive measures, including operational practices such as managing currency exchange risks, adjusting contracting and payment modalities, and introducing flexibility in project amendments, subject to organisational priorities and resources.

Specific recommendation for TI-LB

<p><i>Recommendation</i></p> <p>1.1. Sustain and Strengthen Digital Platforms and Tools</p> <ul style="list-style-type: none"> • Allocate recurring micro-budgets to ensure the ongoing maintenance of EKHBAR. • Continue investing in REHUB by expanding outreach efforts with civil society actors and strengthening advocacy campaigns. • Develop standardized maintenance guides and handover toolkits for municipalities and CSOs to ensure post-project continuity of municipal websites and transparency dashboards. 	<p><i>Partially Accepted</i></p>
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Digital platforms such as EKHBAR, REHUB, and municipal transparency tools were core accountability instruments under BINA’, particularly in a context where institutional access was limited and physical engagement constrained. These tools expanded reach, facilitated reporting and monitoring, and supported evidence-based advocacy when combined with outreach and capacity-building.

Sustaining these platforms requires predictable resources for maintenance, hosting, security, and user support, which cannot be ensured beyond the project period without dedicated funding.

Where feasible, TI-LB will integrate maintenance planning, handover guidance, and partnerships with CSOs and municipalities into future programming. The BINA’ experience highlights the need to

treat digital tools as ongoing accountability infrastructure rather than one-off outputs, subject to funding availability and institutional priorities.

<p><i>Recommendation</i></p> <p>1.3. Expand the Structured Dialogue Model (Integrated SD Recommendations)</p> <ul style="list-style-type: none"> • Formalizing the Structured Dialogue into a replicable, sector-based model with clear criteria for selection, facilitation, and follow-up. • Creating permanent thematic working groups (e.g., energy, environment, procurement, ATI, democratic governance) to continue engagement beyond project cycles. • Developing a central repository archiving SD outputs, EU responses, mappings, and recommendations. • Introducing annual reflection notes summarizing how CSO recommendations influenced EU decision-making 	<p><i>Partially Accepted</i></p>
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The EU–CSO Structured Dialogue under BINA’ was implemented as a practical engagement mechanism rather than a one-off consultation exercise. TI-LB led its convening and facilitation, drawing on its national positioning and relationships with civil society actors. The model created a predictable interface for civil society input into EU programming in a context where many national and local institutions were inactive or inaccessible.

Further consolidation of the model would require clearer articulation of participation criteria, thematic structuring, and follow-up processes, including documentation of how recommendations are taken forward. Proposals such as thematic working groups, structured archiving of outputs, and systematic reflection on influence pathways would need to be assessed in relation to mandate, institutional interest, and available resources.

Any expansion or replication of the Structured Dialogue model will depend on these factors. The BINA’ experience provides a concrete reference point for future initiatives aiming to strengthen structured CSO–donor engagement.

<p><i>Recommendation</i></p> <p>1.4. Strengthening CSO Capacity for Advanced Policy Engagement</p> <ul style="list-style-type: none"> • To further strengthen CSO capacities, introducing advanced modules on political economy analysis, coalition building, negotiation with public institutions, and legal drafting could be explored. • Facilitate mentorship pairings between experienced policy-focused CSOs and smaller grassroots organizations. • Provide coaching for CSOs on evidence-based programming, MEAL, needs assessments, and datadriven advocacy, reflecting SD3 feedback. • Develop and deliver targeted training for CSOs on strategies to overcome resistance from public institutions, including municipalities and ministries, by equipping them with practical tools for navigating bureaucratic barriers, managing political sensitivities, building constructive relationships with officials, and sustaining advocacy efforts in contexts where openness to change is limited. 	<p><i>Partially Accepted</i></p>
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BINA’ placed strong emphasis on strengthening CSO capacities in advocacy planning, evidence generation, MEAL, and engagement with public institutions. This support was particularly relevant for grassroots organisations operating in complex political and administrative environments, where access to decision-makers is limited and advocacy requires sustained effort.

The recommendation to further deepen this support is well founded. Advanced capacity-building in areas such as political economy analysis, coalition building, negotiation with public institutions, and legal or policy drafting could strengthen CSO ability to engage more effectively in reform processes. Approaches such as mentorship, targeted coaching, and tailored training would need to be adapted to context and demand.

Further expansion of capacity-building support will depend on available resources and the scope of future interventions. The foundations established under BINA' provide a basis for integrating more advanced and targeted approaches in future programming.

Recommendations for LCPS

<p><i>Recommendation</i></p> <p>1.5. Sustaining and Expanding the Reach of Project Research</p> <ul style="list-style-type: none"> LCPS should continue to disseminate and expand the reach of the research generated under this project by systematically publishing key findings, policy briefs, and data products on its website, and by actively sharing them through its partners and professional networks. Leveraging existing collaborations, events, and communication channels will help ensure that the evidence produced informs public debate, supports advocacy efforts, and contributes to broader policy and governance discussions beyond the project's lifetime. 	<p><i>Partially Accepted</i></p>
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Research outputs generated under BINA', including surveys, policy analyses, and sectoral studies, were designed to inform advocacy efforts and public policy debate. These outputs remain relevant beyond the project period, particularly in a context where access to reliable institutional data is limited and evidence-based policy discussion remains constrained.

Continued dissemination through publications, policy briefs, reform monitors, events, and professional networks would support the use of this evidence by CSOs, media actors, and policymakers, and contribute to ongoing policy and governance discussions.

Further efforts to sustain and expand dissemination will depend on LCPS's institutional priorities and available resources. The experience under BINA' confirms the value of maintaining a strong link between research, advocacy, and policy engagement.

Final Remarks

We thank the evaluation team for their thorough and constructive assessment, which has provided valuable insights into both the achievements of BINA' and areas for further learning. The evaluation findings have informed this management response and will support ongoing reflection on how to strengthen future programming in similar contexts.

We also acknowledge the support of the European Union, whose funding made it possible for Transparency International Secretariat (TI-S), Transparency International Lebanon (TI-LB), and the Lebanese Center for Policy Studies (LCPS) to implement BINA' and contribute to advancing transparency, accountability, and civic engagement in Lebanon.

Conclusion

The BINA' project delivered high relevance, strong coherence, and measurable effectiveness during one of Lebanon's most complex governance periods. Despite political paralysis, economic collapse, and security disruptions, the project achieved substantial results across civic engagement, policy influence, municipal transparency, CSO capacity strengthening, and evidence-based advocacy. The sub-granting mechanism proved to be the project's most impactful component, enabling local and national CSOs to produce tangible outputs, influence public institutions, and expand citizen participation. Through digital platforms such as EKHBAR, REHUB, and municipal dashboards, and by operationalizing ATI practices via training sessions and tools, the project strengthened accountability pathways that can be replicated across Lebanon. While efficiency was strong considering the context, long-term sustainability requires continued investment, particularly for maintaining digital tools, supporting municipal capabilities, and sustaining CSO-led advocacy. Innovation, both technological and procedural, emerged as a core strength, especially through the structured EU-CSO dialogue model and the integration of technical assistance with grantmaking.

Overall, BINA' contributed meaningfully to strengthening Lebanon's transparency and accountability ecosystem, particularly by enabling CSO-led mechanisms that continued to function despite limited state responsiveness. The recommendations below are organized by stakeholders to clearly show how different actors can build on these gains and sustain progress across the governance chain.

Recommendations by Stakeholder Level

1. Recommendations for BINA' Consortium (TI-S, TI-LB, LCPS)

1.1. Sustain and Strengthen Digital Platforms and Tools – TI-LB

- Allocate recurring micro-budgets to ensure the ongoing maintenance of EKHBAR.
- Continue investing in REHUB by expanding outreach efforts with civil society actors and strengthening advocacy campaigns.
- Develop standardized maintenance guides and handover toolkits for municipalities and CSOs to ensure post-project continuity of municipal websites and transparency dashboards.

1.2. Institutionalizing Adaptive Management Practices – TI-S

- Systematically document crisis-time adaptive measures undertaken by TI-S, such as managing currency exchange risks (e.g., disbursing payments in USD while receiving funds in EUR) and introducing flexibility in project amendments, to inform future operational decision-making.

1.3. Expand the Structured Dialogue Model – TI-LB

(Integrated SD Recommendations)

- Formalizing the Structured Dialogue into a replicable, sector-based model with clear criteria for selection, facilitation, and follow-up.

- Creating permanent thematic working groups (e.g., energy, environment, procurement, ATI, democratic governance) to continue engagement beyond project cycles.
- Developing a central repository archiving SD outputs, EU responses, mappings, and recommendations.
- Introducing annual reflection notes summarizing how CSO recommendations influenced EU decision-making.

1.4. Strengthening CSO Capacity for Advanced Policy Engagement – *TI-LB*

- To further strengthen CSO capacities, introducing advanced modules on political economy analysis, coalition building, negotiation with public institutions, and legal drafting could be explored.
- Facilitate mentorship pairings between experienced policy-focused CSOs and smaller grassroots organizations.
- Provide coaching for CSOs on evidence-based programming, MEAL, needs assessments, and data-driven advocacy, reflecting SD3 feedback.
- Develop and deliver targeted training for CSOs on strategies to overcome resistance from public institutions, including municipalities and ministries, by equipping them with practical tools for navigating bureaucratic barriers, managing political sensitivities, building constructive relationships with officials, and sustaining advocacy efforts in contexts where openness to change is limited.

1.5. Sustaining and Expanding the Reach of Project Research – *LCPS*

LCPS should continue to disseminate and expand the reach of the research generated under this project by systematically publishing key findings, policy briefs, and data products on its website, and by actively sharing them through its partners and professional networks. Leveraging existing collaborations, events, and communication channels will help ensure that the evidence produced informs public debate, supports advocacy efforts, and contributes to broader policy and governance discussions beyond the project’s lifetime.

2. Recommendations for the European Union (EU Delegation in Lebanon)

2.1 Make Long-Term Governance Funding Cycles the Norm

- Shift from short 2–3-year cycles to 5–7-year governance programs that allow reforms to mature.
- Integrate “advocacy runway funding” to capitalize on short political openings (new ministers, revived laws, parliamentary windows).

2.2 Provide Further Indirect Support to Municipalities

Municipalities continue to face significant financial and bureaucratic constraints, alongside ongoing technical capacity needs. In this context, the project demonstrated that supporting municipalities indirectly through civil society organizations (CSOs) is an effective approach to strengthening governance and improving transparency standards and practices. This model also helped bridge gaps in understanding between municipalities and citizens, particularly regarding rights, obligations, and mutual expectations. Therefore:

- Establish a parallel municipal micro-grant mechanism to support the maintenance of transparency platforms, ATI units, dashboards, and citizen committees.
- Support continuous capacity-building for municipal staff, with a focus on procurement, Access to Information (ATI), and digital governance.

2.3 Reduce Administrative Burden on Small CSOs

- Simplify reporting requirements for small/medium CSOs (shorter templates, fewer indicators, quarterly reporting).
- Introduce a light compliance pathway for grants under a set threshold.

2.4 Expand the Structured Dialogue into a Permanent Accountability Forum

(Integrated SD Recommendations)

- Institutionalize the EU–CSO Structured Dialogue as an annual or semiannual national platform feeding into the MIP and upcoming EU calls.
- Ensure wider inclusion: youth, women-led groups, municipalities, academia, media actors, and informal grassroots groups.
- Provide clear, timely communication on how SD recommendations shape programming and publish follow-up notes after every round.
- Ensure that sectoral consultative processes (e.g., Blue Economy, Social Cohesion, Culture) remain co-creation spaces, not one-off consultations.
- Improve accessibility of EU calls by simplifying language, extending application windows, and holding pre-application Q&A sessions.

2.5 Fund Scaling of Successful Pilot Models

- Scale municipal transparency packages (websites, dashboards, citizen committees) to new municipalities.
- Expand digital tools like Ekhbar with outreach, cybersecurity upgrades, and institutional integration.

3. Recommendations for Lebanese CSOs

3.1 Consolidate Coalitions and Shared Advocacy Platforms

- Build thematic coalitions (ATI, procurement, gender equality, environmental governance, youth participation).
- Share tools and datasets (indices, ATI trackers, templates) to reduce duplication.

3.2 Strengthen Internal Governance and Long-Term Advocacy Planning

- Adopt multi-year advocacy plans independent of donor cycles.
- Institutionalize internal MEL systems to track influence, policy windows, research gaps, and stakeholder shifts.

3.3 Invest in Digital Literacy and Community Outreach

- Conduct regular community training sessions on municipal websites, ATI requests, EKHBAR use, dashboards, and complaint mechanisms.
- Develop citizen-friendly materials (videos, WhatsApp explainers, audio guides) to bridge digital and literacy gaps.

3.4 Build Local-Level Partnerships

- Formalize partnerships with municipalities, mukhtars, school networks, and community committees.
- Develop joint oversight committees involving CSOs, citizens, and municipal councils.

3.5 Engage More Effectively in the Structured Dialogue

(Integrated SD Recommendations)

- Prepare sectoral evidence, needs assessments, and research prior to SD sessions to increase influence.
- Participate actively in regional and thematic cycles to ensure representation of marginalized groups.
- Use SD outputs to align advocacy strategies with national priorities and EU programming cycles.

3.6 Continue Collaboration with TI-LB

- CSOs are encouraged to maintain ongoing collaboration with TI-LB and seek its team's guidance and technical support on corruption-related cases, municipal elections, and the development and implementation of anti-corruption strategies.

4. Recommendations for Municipalities

4.1 Institutionalize Transparency Practices

- Adopt internal policies requiring publication of budgets, procurement plans, municipal decisions, and meeting minutes.
- Assign a Transparency Focal Point responsible for ATI, dashboards, and citizen communication, where capacity allows.

4.2 Maintain and Update Digital Platforms

- Dedicate small but sustained budget lines to website hosting, data updates, and helpdesk/citizen response units.
- Partner with local CSOs to co-manage dashboards and update transparency indicators.

4.3 Strengthen Citizen Engagement Mechanisms

- Institutionalize participatory committees involving women, youth, and CSOs.
- Hold periodic public town halls, livestream key tenders, and publish annual transparency reports.

4.4 Build Internal Capacity on Governance Tools

- Train staff on ATI, procurement, complaint handling, and digital communication.
- Use municipal platforms to track responsiveness and citizen requests in real time.

4.5 Integrate Structured Dialogue Learnings

(Integrated SD Recommendations)

- Participate in future EU–CSO dialogues to channel local governance challenges directly into programming.
- Use SD outputs to strengthen municipal planning, digital governance, and citizen accountability structures.

5. Recommendations for the Lebanese Government (if political will emerges)

5.1 Activate and Resource Oversight Institutions

- Fully activate and fund the National Anti-Corruption Commission (NACC).
- Formalize pathways for processing Ekhbar reports and citizen complaints.

5.2 Adopt and Implement Pending Transparency Reforms

- Prioritize implementation of ATI, procurement law, whistleblower protection, and digital governance frameworks.
- Require ministries to publish annual transparency and accountability reports.

5.3 Enable Municipalities to Meet Transparency Standards

- Amend municipal law to require disclosure of budgets, procurement files, and municipal decisions.
- Allocate matching grants for digital transparency tools and public engagement mechanisms.

5.4 Support National-Level Data and Research Access

- Provide CSOs and researchers with access to governmental datasets.
- Facilitate MoUs between ministries and CSOs for collaborative sectoral reform.

5.5 Build on Structured Dialogue Outcomes

(Integrated SD Recommendations)

- Engage ministries and public institutions in future Structured Dialogues.
- Align national reform agendas with the cross-sector priorities identified across SD1–SD3.

Use SD-generated mappings to inform national strategies on social cohesion, democratic participation, culture, environmental sustainability, and public sector reform.