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ANNEX III

to the Commission Implementing Decision on the financing of the annual action plan in favour of Honduras for 2024

Action Document for “Support Transparency Efforts and the Fight against Corruption”

ANNUAL PLAN

This document constitutes the annual work programme within the meaning of Article 110(2) of the Financial Regulation, within the meaning of Article 23 of the NDICI-Global Europe Regulation.

1 SYNOPSIS

1.1. Action Summary Table

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| 1. Title CRIS/OPSYS business reference Basic Act | Support Transparency Efforts and the Fight against Corruption Opsys number: ACT-62575 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe) |
| 2. Team Europe Initiative | No |
| 3. Zone benefiting from the action | The action shall be carried out nationwide, and specifically in the departments of Francisco Morazán, Valle, Choluteca, Comayagua, Santa Bárbara, Cortés and Yoro. |
| 4. Programming document | Multiannual Indicative Programme (2021-2027) Honduras |
| 5. Link with relevant MIP(s) objectives / expected results | Priority Area 3: Rule of law and democratic governance |
| PRIORITY AREAS AND SECTOR INFORMATION | |
| 6. Priority Area(s), sectors | 151 - Support national efforts and provide institutional strengthening to guarantee the universal application of the law and protection of human rights, particularly focusing on transparency and the fight against corruption |
| 7. Sustainable Development Goals (SDGs) | Main SDG: SDG 16: Peace, Security and Strong Institutions Other significant SDGs : SDG 3: Ensure healthy lives and promote well-being for all at all ages SDG 5: Achieve gender equality and empower all women and girls SDG 17: Partnership for the Goals |
| 8 a) DAC code(s) | Government & Civil Society-general (151) – 100% Sub-code 15113 - Anti-corruption organizations and institutions (50%) Sub-code 15150 - Democratic participation and civil society (50%) |
| 8 b) Main Delivery Channel | 41128 – UNODC 20000 – NGOs and Civil Society |

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|---------------------------------------|---|---|---|-------------------------------------|
| 9. Targets | <input type="checkbox"/> Migration <input type="checkbox"/> Climate <input checked="" type="checkbox"/> Social inclusion and Human Development <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input type="checkbox"/> Education <input checked="" type="checkbox"/> Human Rights, Democracy and Governance | | | |
| 10. Markers (from DAC form) | General policy objective @ | Not targeted | Significant objective | Principal objective |
| | Participation development/good governance | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Aid to environment @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Gender equality and women's and girl's empowerment | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Reproductive, maternal, new-born and child health | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Disaster Risk Reduction @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Inclusion of persons with Disabilities @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Nutrition @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | RIO Convention markers | Not targeted | Significant objective | Principal objective |
| | Biological diversity @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Combat desertification @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Climate change mitigation @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Climate change adaptation @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Internal markers and Tags: | Policy objectives | Not targeted | Significant objective | Principal objective |
| | Digitalisation @ | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | digital connectivity digital governance digital entrepreneurship digital skills/literacy digital services | YES <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> | NO <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> | / |
| | Connectivity @ | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | digital connectivity energy transport | YES <input checked="" type="checkbox"/> <input type="checkbox"/> | NO <input type="checkbox"/> <input checked="" type="checkbox"/> | / |

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|------------------------------|--|-------------------------------------|-------------------------------------|--------------------------|
| | health | <input type="checkbox"/> | <input checked="" type="checkbox"/> | / |
| | education and research | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| | Migration @ | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Reduction of Inequalities1 @ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Covid-19 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| BUDGET INFORMATION | | | | |
| 12. Amounts concerned | Budget line(s) (article, item): ACT-62575 BGUE-B2024-14.020140-C1-INTPA Total estimated cost: EUR 7 500 000 Total amount of EU budget contribution EUR 7 500 000 | | | |
| 13. Type of financing | Indirect management (with the entity(ies) to be selected in accordance with the criteria set out in section 4.3.2) and Direct management | | | |

1.2. Summary of the Action

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| | <p>This Action addresses the core aspects of good governance, transparency and fight against corruption, improving institutional and civil society capacities to actively participate in decision-making processes.</p> <p>The overall objective of the Action is to contribute to good governance in public management by increasing institutional integrity and accountability, strengthening the administrative framework, the capacity to prevent and combat corruption and improve asset recovery as well as improving the role of civil society in their advocacy, oversight and civil role in anticorruption efforts.</p> <p>The Action is structured along three specific objectives:</p> <ol style="list-style-type: none"> Strengthen institutional mechanisms to develop and implement comprehensive policies to promote transparency, prevent and punish corruption from a human rights based and gender equality approach. <p>While Honduran legislation may comply with most of the corruption prevention provisions contained in international conventions, several of the measures are mere formalities, poorly aimed, or implemented as isolated efforts. Therefore, some of these measures require a more precise allocation of institutional roles, responsibilities and capabilities to improve implementation. In this context, the Action will support the National Transparency and Anti-Corruption System (SNTA) and the implementation of the National Transparency and Anti-Corruption Strategy of Honduras (ENTAH) with the Open State Action Plan Honduras (PAEAH).</p> <ol style="list-style-type: none"> Improve systems for gender sensitive citizen reporting and oversight of acts of corruption through digitalization to increase simplification of administrative procedures and improve asset recovery. <p>This Action will support the launch of the Citizen Report Management System, known as ‘System 130’, in order to improve citizens' access to a reporting mechanism specific for acts of corruption at the three levels of government: national, departmental and municipal. System 130 will allow anonymous reporting to protect the identity of whistleblowers and thus avoid threats or reprisals against them.</p> <p>Additionally, the Action will support the Ministry for Transparency and the Fight against Corruption in developing risk mitigation plans so that the prioritised entities can deal with reports of corruption, adopt counteracting measures,</p> |
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1 For more information, please consult: The European Commission inequality marker - Publications Office of the EU (europa.eu) and Inequality Marker – Complementary Guidelines Application of the I-Marker to SSC fiches and Action Documents | Capacity4dev (europa.eu)

simplify administrative procedures, follow up on reports, support official lines of investigation, strengthen their audit processes, and provide support in the application of the corresponding punishments.

Finally, this Action will aid the Public Prosecutor's Office with the provision of equipment and specialised training for protecting whistle-blowers and the recovery of assets gained through corruption.

3. Improve mechanisms for inclusive and gender sensitive citizen participation by creating and promoting spaces for dialogue with Citizen Transparency Commissions and increase oversight of public infrastructure projects.

The Action will specifically reinforce activities that advance and improve conditions for citizen oversight, encourage the participation of Citizen Transparency Commissions (CCT) and boost municipal transparency through CCTs as an instance of citizen participation and oversight of local public management processes. This Action will also promote citizen oversight of infrastructure projects and strengthen the systematization, dissemination, and socialization of public information in open formats.

This Action is related to the activities that the European Union (EU) carries out to implement the Global Gateway Investment Agenda in Honduras², fulfilling the role of an important enabler for an environment conducive to public and private investment in green/sustainable infrastructures transformative for the country. It is expected that the Action will strengthen public institutions and citizens by encouraging the better exercise of the right of access to information, in addition to fostering transparency and accountability to help in the fight against corruption. It does not only focus on creating communication and collaboration spaces between society and authorities, but also on building capacities and skills for citizens, the private sector, and authorities, so that they can collaborate in preventing and containing corruption while addressing various public interest issues together.

1.3 Zone benefitting from the Action

The component:

1) Strengthen institutional mechanisms to develop and implement comprehensive policies to promote transparency, prevent and punish corruption from a human rights based and gender equality approach of the Action shall be carried out in Honduras (nation-wide), included in the list of ODA recipients.

The components:

2) Improve systems for gender sensitive citizen reporting and oversight of acts of corruption through digitalization to simplify administrative procedures and improve asset recovery and

3) Improve inclusive and gender based mechanisms for citizen participation by creating and promoting spaces for dialogue with Citizen Transparency Commissions and increasing oversight of public infrastructure projects will benefit primarily to the GGIA selected geographical areas of the Yojoa Lake Basin, Sula Valley and Choluteca Basin (e.g.: Departments of Francisco Morazán, Valle, Choluteca, Comayagua, Santa Bárbara, Cortés and Yoro).

² https://international-partnerships.ec.europa.eu/policies/global-gateway/eu-lac-global-gateway-investment-agenda_en

2 RATIONALE

2.1 Context

In recent years, Honduras has descended into one of the most profound governance crises in the region, with corruption surging to unprecedented levels in the country's history. Despite the current government's efforts over the last two years to combat corruption and restore governance, the country continues to bear the brunt of this crisis. The persistent and profound multi-sectoral crisis in Honduras has limited substantive progress in several components of human development, and one manifestation of this process is the weakening of the rule of law.

According to the 2022 Human Development Report of Honduras, the moderate evolution in central human development issues such as income, schooling, life expectancy, and other variables, has been insufficient to close the inequality and exclusion gaps. Honduras has an HDI of 0.634, the lowest in the Central American region, 21.7% lower than that of Costa Rica (0.810), the country with the highest HDI in Central America. At the Latin American regional level, Honduras is ranked 25.5% lower than Chile (0.851), which is the country with the highest HDI value in the region³.

In terms of gender equality and women's empowerment (GEWE), although some progress has been achieved, work still has to be done to reach gender equality. 33.6% of women aged 20–24 years old who were married or in a union before age 18. The adolescent birth rate is 88.7 per 1,000 women aged 15-19 as of 2014, down from 103 per 1,000 in 2013. As of February 2021, only 21.1% of seats in parliament were held by women⁴. Honduras has one of the highest rates of violent deaths of women in the world, by 2021, there were reported 318 violent deaths of women. Violence against women is widespread and systematic in Honduras, affecting women and girls in numerous ways, including high levels of gun violence, domestic violence, femicide, and sexual violence. The country is both a source and transit country for human trafficking, with women being the most affected by it. The COVID-19 pandemic has exacerbated the situation, resulting in an increase in reported cases of domestic and intrafamily violence⁵.

In this context, corruption becomes a structural phenomenon, and one contributing factor is the impunity of those who engage in these practices, as the Inter-American Commission on Human Rights (IACHR) pointed out in its 2019 report on corruption and human rights⁶. Likewise, in the same study, the IACHR points out that impunity is not the only factor that makes corruption possible and that other factors facilitate it, such as:

- (a) Institutional weakness of the State, which is characterized by the inability of territorial coverage and by institutions unable to comply with their functions fully;
- b) Monopoly or concentration of power in areas with high economic or social impact, where resources are managed, or decisions with political and social implications are made;
- c) Ample room for discretion in decision-making by State agents;
- d) Lack of control over the actions of the authority, which is based on the lack of transparency and accountability of the decisions adopted by the authority, as well as on the secret nature of corruption; and,
- e) A high level of impunity permits acts or systems of corruption to function on the assumption that the benefits obtained far outweigh the costs.

In Honduras, the issue of transparency goes back to 1982 when the right of any individual or association request information from authorities and obtain a response was enshrined in Article 80 of the Constitution. In 2007, the Law on Transparency and Access to Public Information was published, thereby creating the Institute for Access to Public Information, which is responsible for advocating for, supervising and regulating the public institutions obliged to provide information to citizens, even those at the municipal government level. This institutional framework handles reports and complaints of acts of administrative corruption.

³ The Human Development Report for Honduras - 2022 is available at: <https://readymag.website/u2218266494/idh-hn/>

⁴ Country Fact Sheet | UN Women Data Hub

⁵ World Bank Document

⁶ IACHR. Corruption and Human Rights: Inter-American Standards, (December 2019): 6, <http://www.oas.org/es/cidh/informes/pdfs/CorrupcionDDHHES.pdf>

One way to encourage integrity and fight against corruption is through Honduras's Code of Conduct for Public Servants, an umbrella regulatory instrument. Its application and compliance are monitored by the High Court of Auditors, which issues binding regulations, opinions and rulings, along with the Probity and Public Ethics Committees of each public institution. The Judiciary is similarly governed by the Code of Ethics for Judicial Officials and Employees, which establishes the mandatory rules of behaviour for these judicial public servants.

In 2022, the Ministry of Transparency and the Fight Against Corruption (STLCC) was created to prevent and fight corruption in the performance of public and private duties, pursuant to the guidelines of the Office of the President. This ministry designs, coordinates and evaluates anticorruption policies, strategies and programs to foster transparency and good governance practices. In addition to promoting transparency and preventing corruption, its strategic objectives also aim at bettering the entities involved in citizen reporting, internal control, efficiency and integrity in public procurement while ensuring administrative efficiency. All of these have been incorporated into the National Transparency and Anticorruption Strategy of Honduras (ENTAH), which contains lines of action and names those responsible in the public, private and civil sectors for designing actions and programs to fight corruption.

In Honduras, the State and society face enormous challenges such as: the lack of transparency and integrity of public management; low citizen participation in the prevention of corruption; weak detection and investigation of corruption cases; the inoperability of effective mechanisms to sanction those responsible; the impossibility of asset recovery and the restoration of rights for society as a whole; low inter-institutional cooperation; limitations on access to public information; the low capacity of central and municipal level institutions for accountability; the absence of articulated mechanisms for managing conflicts of interest and the lack of a comprehensive approach to corruption risk management; and the lack of promotion of good anti-corruption practices in the public and private sectors. These challenges create opportunities for corruption and do not contribute to the generation of citizen confidence in public institutions.

Despite the difficulties, there are some advances in the fight against corruption, the improvement of transparency and the empowerment of civil society at the national level, such as the creation of the Secretariat for Transparency and Fight against Corruption (STLCC), the co-creation of the National Transparency and Anti-Corruption Strategy of Honduras (ENTAH), together with the Open State Action Plan Honduras 2023-2025, and the promotion of an open government with a territorial, inclusive and participatory approach. Moreover, the Ministry of Transparency and Fight Against Corruption launched in June 2024, together with the National University of Honduras, the 'National Academic Observatory of Transparency and Anticorruption' (OUNTAH), whose objective is to strengthen the dissemination of information and promote citizens' participation in decision-making processes on fundamental topics for the country. This approach has made it possible to gradually promote anti-corruption practices and generate a better understanding of the corruption phenomenon in the executive branch and local governments.

Accordingly, **the Action will address the challenges of fighting corruption, promoting transparency, citizen reporting and oversight of infrastructure projects, thus being a key facilitator of Global Gateway investments.**

In fact, the Action will support the development and implementation of sectoral anti-corruption strategies, especially in those sectors where there is a high social and environmental impact as the public infrastructure projects identified as priorities under the Global Gateway Investment Agenda for Honduras.

For the prevention and fight against corruption to be effective, it is required the interaction of multiple state entities. For this reason, the Action will strengthen transparency and anticorruption-related institutional capacities in different entities and civil society while seeking ways to improve coordination between the various monitoring entities. It will also enhance inter institutional coordination to prevent and combat corruption by supporting the Ministry for Transparency and the Fight against Corruption, Citizen Transparency Commissions, Citizen Reporting System Line 130, and the National System for Transparency and Anti-Corruption.

The proposed approach is to take advantage of the favorable economic and fiscal context in 2024 and 2025 by focusing on investment priorities and the EU added value in addressing social and environmental concerns. This will also mitigate the risks associated with the construction of major infrastructure in conflictive and sensitive areas. A participatory approach will be essential for the acceptance of these projects by local communities, with huge implications for the EU's reputation.

The Action is aligned with the EU Gender Action Plan III 2021-2025⁷ in particular to its thematic areas of engagement “Promoting equal participation and leadership” as well as “Ensuring freedom from all forms of gender-based violence”. Likewise, it will contribute to the implementation of the EU’s Action Plan on Human Rights and Democracy (2020 2024)⁸, particularly by enhancing democratic, accountable and transparent institutions (pillar 2.1), and promoting responsive, inclusive, participatory and representative decision-making (pillar 2.2).

The Action Document in AAP 2023 “Building a citizen-oriented, equally accessible, effective, independent and accountable justice system in Honduras” is being developed considering the synergies with the present proposal. It aims to tackle the main rule of law and justice challenges, including the limited capacity of justice sector institutions, the lack of adaptation of the normative framework to international standards, and the insufficient capacity of the most vulnerable sectors and the wider civil society to make use of the legal system. In addition, the initiatives funded under the Civil Society Organizations and Human Rights thematic lines will also privilege activities contributing to the specific objectives herein defined, especially in prioritized GGIA territories.

2.2. Problem Analysis

Corruption is a global multifaceted problem that generates negative impacts on the quality of people’s lives and on the exercise of fundamental rights. It also affects the institutional capacities to face the challenges, risks, and problems of society, and diminishes the quality of essential goods and services in infrastructure, health, education, transportation, among others, that are vital for a country’s development.

It is remarkable that in the last three years, Honduras scored 23 out of 100 points in the Transparency International’s Corruption Perception Index⁹, ranking 157th out of the 180 countries evaluated in 2023. Likewise, the latest results of the Global Corruption Barometer for the Latin American region showed that 54% of Hondurans considered corruption levels had increased and 62% considered that the government was doing a bad job in fighting corruption, while the 2023 report shows that corruption seriously affects Honduran democracy.

Corruption is a structural problem that has worsened in recent years due to institutional weakness, lack of transparency, accountability, impunity, and limited citizen participation. According to the latest survey conducted by the University Institute for Democracy, Peace and Security (IUDPAS), 81% of Hondurans believed that corruption has increased in the last five years. Furthermore, 74% believe that the institutions in charge of fighting corruption are ineffective or very ineffective. Corruption severely affects Hondurans, especially the most vulnerable and excluded, who see their opportunities for access to basic services, justice, security, and participation limited. Corruption also affects the private sector, which faces higher costs and risks when investing and generating employment. Also, the latest inform¹⁰ of the Human Rights Watch Organization (2023), alert that corruption causes human rights affectations for the Hondurans, particularly because of the lack of judiciary independence. Similarly, in the last decade corruption had a high incidence in public and private institutions, undermining citizen confidence, the rule of law and the efficient use of public resources. According to Human Rights Watch's 2024 World Report. From January to August 2023, 236 human rights defenders in Honduras were harassed, threatened or attacked, and at least 13 were killed, compared to 11 killed in all of 2022, the UN Office of the High Commissioner for Human Rights (OHCHR) in Honduras reported.

According with the 2024 world report of Human Rights Watch. From January through August 2023 in Honduras, 236 human rights defenders were harassed, threatened, or attacked, and at least 13 were killed—compared to 11 killed in all of 2022—the UN Office of the High Commissioner for Human Rights (OHCHR) in Honduras reported. Seventy-five percent of the defenders attacked and more than 90 percent of those killed were environmental or land defenders¹¹

Institutional mechanisms and policies for transparency and corruption prevention

At the governance level, institutions permeated by corruption are inefficient, facilitate significant investment loss, and have limited power to prevent and prosecute crime. At the national policy level, contradictory and overlapping

⁷ https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2184

⁸ https://www.eeas.europa.eu/sites/default/files/eu_action_plan_on_human_rights_and_democracy_2020-2024.pdf

⁹ In which a high score represents a lower perception of corruption and a low score represents a higher perception of corruption.

¹⁰ <https://www.hrw.org/es/world-report/2024/country-chapters/honduras>

¹¹ World Report 2024: Honduras | Human Rights Watch (hrw.org)

mandates also exacerbate this dynamic. Corrupt officials (and those involved in organized crime and money laundering) take advantage of poor policies, generating illicit financial flows, some of which enable the importation of illicit money into licit markets, including those of the European Union.

Moreover, poor in-country policy development, combined with the ease of cross-border business (legal and illegal), inherently means that no single country in the region can effectively counter corruption and the movement of corrupt money and assets. Despite multiple calls for collective action and interest in generating some national and regional policies aimed at combating corruption, departments in Honduras continue to suffer from fragmented and poor coordination in the prevention and prosecution of acts of corruption and in the seizure, confiscation, and recovery of assets linked to corruption.

Therefore, it is necessary to promote comprehensive national anti-corruption policies that foresee inter-institutional coordination and can be easily replicated in other levels of government. These policies will promote actions in the preventive sphere that improve transparency and accountability, and also generate actions that contribute to detecting and mitigating corruption risks in the selected departments.

Systems for citizen reporting and follow-up on acts of corruption

Corruption severely affects Hondurans, especially the most vulnerable and excluded, who see their opportunities for access to basic services, justice, security, and participation limited. Corruption also affects the private sector, which faces higher costs and risks when investing and generating employment.

This has increased citizens' fear of reporting acts of corruption because they may receive reprisals and put their integrity at risk. In the case of corruption, as in other Central American countries, Honduras does not have specific legislation for the protection of whistleblowers but only a Law for the Protection of Witnesses in criminal proceedings.

The Action will support the implementation of the Citizen Reporting System accompanied by a massive awareness and sensitization campaign on the importance of reporting acts constituting a crime or administrative misconduct (according to the country's current legislation) and the existence of the available reporting mechanism to increase citizens' confidence in its effectiveness in combating corruption and reduce citizens' fear of reporting acts of corruption. It will also support the design of legislation for protecting victims, witnesses, and whistleblowers in corruption cases.

The Action will seek coordinated action between the State, civil society, the private sector, academia, and international cooperation, aimed at promoting a culture of integrity and transparency, strengthening institutional capacities to prevent and investigate corruption, guaranteeing the practical application of the law and encouraging citizen participation in social control.

Additionally, this Action is not only focused on promoting and strengthening mechanisms for society to report, but also, to create strategies that reinforce normative and administrative processes to ensure the transparency and accountability in the entire process, from the moment it is reported to the moment it is punished.

Mechanisms for citizen participation through the Citizen Transparency Commissions

The Citizen Transparency Commissions (CCT) are citizen participation bodies that carry out social audits of municipal public management. However, even though the Law of Municipalities and its regulations declare that the establishment of Commissions is mandatory, not all mayors' offices comply with this provision.

There still needs to be more transparency in municipal management, which negatively affects local development, the quality of public services, and citizen confidence in institutions. According to a Washington Office on Latin America (WOLA) report, Honduras has a low score on the budget transparency index and a high perception of corruption, evidencing local governments' weaknesses. Additionally, a civil society organization "C-Libre" study established that only 9% of the municipalities comply with the minimum standards of active and passive transparency.

Currently, local governments do not have sufficient and timely information on the use of their public resources, the execution of programs and projects, and the provision of services. This limits citizens' ability to exercise their right to

access information, to participate in decision-making processes, and to play a part in social oversight. It also affects social organizations, the media, and other actors that seek to oversee and report irregularities in municipal management.

This problem was aggravated by the COVID-19 pandemic, which led to a health, social, and economic emergency in the country. It hindered access to public information and increased the risks of corruption and impunity in the management of funds allocated to address the crisis.

According to data from the National Statistics Institute (INE), Honduras has 298 municipalities with an estimated population of 9.9 million. Currently, there are no exact figures available on the number of municipalities with active and functional CCTs or on the level of compliance with internal control plans. However, according to the WOLA report, only 18% of citizen requests for access to information received a response in 2018.

CCTs are intended to spread knowledge and skills related to the right of access to information, transparency, accountability, and anticorruption to empower citizens to perform their duties and so more effectively. With these skills and knowledge, CCTs can better assist the Municipal Commissioner in designing the Municipal Transparency program to ensure transparency in the municipal government.

Citizen oversight of public infrastructure projects

Historically, Honduras' infrastructure sector has been one of the most vulnerable to corruption. For instance, the 'Fondo Vial' (Road Fund) was liquidated after a series of allegations of acts of corruption and the awarding of contracts to companies linked to drug trafficking. Those affected by this problem are mainly citizens and civil society organizations that want to have access to information and oversee the use of public resources destined for infrastructure, as well as potential suppliers and contractors who want to participate in bids transparently and competitively. Also affected are public officials in charge of planning, managing, and supervising infrastructure projects who need timely and accurate information to make better decisions.

This problem occurs nationally, involving various public entities that contract and execute infrastructure projects throughout Honduran territory. However, depending on each institution's capacities and political will, there may be regional or local differences in the degree of access and quality of information available.

Citizens have suffered the consequences of poorly executed, delayed, or abandoned works that need to meet quality standards or respond to the real needs of the population. Suppliers and contractors have faced barriers to accessing business opportunities and risks of corruption and contractual non-compliance. Public officials have had difficulties planning, coordinating, monitoring, and evaluating project performance, as well as in being accountable to the public and oversight agencies.

This situation has been aggravated in recent years by the increase in public investment in infrastructure, especially during the COVID-19 pandemic, which has generated greater demand and pressure for the construction or improvement of hospitals, roads, bridges, and other public works. According to the report "Honduras: Monitoring of Public Procurement during the COVID-19 emergency", prepared by the Central American Institute for Fiscal Studies (ICEFI), in 2020, between March and August of that year, 1,683 procurements related to the health emergency were made for a total amount of 12,516 million Lempiras (approximately US\$509 million), of which only 43% corresponded to infrastructure.

This originates from historical institutional weakness and a lack of political will to implement a public policy of open contracting that guarantees access to information at all life cycle stages of infrastructure projects, from identification to delivery. Since 2006, Honduras has had a *law on access to public information and a digital platform called Honduras Inversions*. These tools are the spearhead to ensure the proactive, systematic, and standardized publication of data and information on procurement and infrastructure projects. However, there are challenges, such as the lack of coordination between the public entities involved, the lack of human resources to manage the data, the resistance to cultural and organizational change that implies greater openness and transparency, and the scarce participation and social demand from potential users of the data.

This has negatively impacted those affected since the first initiatives to promote open contracting in Honduras were launched several years ago. According to the "Open Contracting in Honduras: Progress and Challenges" report published by the Latin American Initiative for Open Data (ILDA), Honduras has lagged behind other countries in the region that have advanced more rapidly in the implementation of the Open Contracting Data Standard (EDCA), such as Colombia, Mexico, and Chile.

This Action aims to promote citizen oversight of infrastructure projects and strengthen the systematization, dissemination, and socialization of public information in open formats through the creation of a citizen module in the National Open Data Portal. This portal will provide information about public infrastructure projects, under the Open Contracting Standard for Infrastructure Data (OC4IDS), which will allow access to information on the entire infrastructure project cycle (process and contract, until the successful or unsuccessful delivery of the project).

Also, it will address the limited access to reliable, complete, and comparable data on contracting and infrastructure projects, which hinders monitoring, evaluation, and citizen participation in this sector which is vital to the country's development.

At present, no initiative seems to provide technical advice to the public, private, and civil society sectors on the multiple measures that can be adopted to prevent, control, and manage corruption risks more efficiently. Hence, this action is intended to improve reporting of acts of corruption and encourage the public and civil society to play an increasingly important role in the controls and fight against corruption.

In this context, the Action will promote good governance and transparency as key principles for improving the effective implementation of the Global Gateway Investment Agenda.

Identification of main stakeholders (duty bearers and right holders) and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action:

Secretariat for Transparency and Fight against Corruption (STLCC)

Public sector (State institutions responsible for ENTAH and PAEAH commitments and actions).¹²

Multi-stakeholder Forum of the Open State Action Plan¹³

Private sector (Honduran and European)

Local governments

Gender focal points of the institutions listed

Academic sector (Universities, academic networks, among others)

Civil Society Organizations (women, youth, indigenous peoples, senior citizens, social movements, etc.).

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The overall objective of this action is to contribute to good governance in public management in Honduras by increasing institutional integrity and accountability, strengthening the administrative framework, the capacity to prevent and combat corruption and improve asset recovery as well as improving the role of civil society in their advocacy, oversight and civil role in anticorruption efforts.

The specific objectives of this action are:

¹² Public sector refers to all the institutions mentioned in the ENTAH.

¹³ The newly formed multi-stakeholder forum has also brought in an advisory team that includes key government agencies, such as the Ministry of Finance, the High Court of Auditors (TSC), the Institute for Access to Public Information (IAIP) and the National Anticorruption Commission (CAN). It includes all the major government stakeholders and a wide-ranging, diverse group of civil society organizations that play an essential role in the implementation of the OGP's just launched Open Government Action Plan (PEAEH).

1. Strengthen institutional mechanisms to develop and implement comprehensive policies to promote transparency, prevent and punish corruption from a human rights based and gender equality approach.
2. Improve systems for gender sensitive citizen reporting and oversight of acts of corruption through digitalization to simplify administrative procedures and improve asset recovery.
3. Improve mechanisms for inclusive and gender sensitive citizen participation by creating and promoting spaces for dialogue with Citizen Transparency Commissions and increasing oversight of public infrastructure projects.

The outputs to be obtained with this action and which will contribute to the corresponding specific objectives are the following:

Outcome 1. Institutional mechanisms strengthened to develop and implement comprehensive policies to promote transparency, prevent and punish corruption from a human rights-based and gender equality approach.

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| OUTPUT 1.1 | The National System for Transparency and the Fight against Corruption (SNTA) is supported in prioritized departments |
| OUTPUT 1.2 | Effective management of corruption risks is promoted and improved in prioritized departments |
| OUTPUT 1.3 | The VI Open State Action Plan of Honduras is co-created with the effective participation of the multi-stakeholder forum |

Outcome 2. Systems improved for gender sensitive citizen reporting and oversight of acts of corruption through digitalization to simplify administrative procedures and improve asset recovery.

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| OUTPUT 2.1 | The implementation of System 130 is supported in prioritized departments. |
| OUTPUT 2.2 | Improved and more accessible gender sensitive citizen reporting to optimize the effective management of risks and corruption cases. |
| OUTPUT 2.3 | Corruption risk management plans in the private sector are strengthened and simplification of administrative procedures are simplified in prioritized departments. |
| OUTPUT 2.4 | Internal protocols and regulatory tools for citizen oversight, as well as the reporting-punishment process are strengthened. |

Outcome 3. Mechanisms for inclusive and gender sensitive citizen participation improved by creating and promoting spaces for dialogue with Citizen Transparency Commissions and increasing oversight of public infrastructure projects.

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| OUTPUT 3.1 | The capacities of the CCTs and authorities in terms of rights to access information, transparency, accountability, and anti-corruption are strengthened. |
| OUTPUT 3.2 | The design of municipal transparency programs to encourage citizen participation in decision-making processes is promoted. |
| OUTPUT 3.3 | Increased citizen oversight of public infrastructure projects for monitoring and control of public management, including particularly vulnerable population groups. |

3.2 Indicative Activities

Activities related to Output 1.1: The National System for Transparency and the Fight against Corruption (SNTA) is supported in prioritized departments

- Design and implement anti-corruption plans for the SNTA sectors.
- Design and implement awareness campaigns to establish the SNTA in different sectors.
- Training in anti-corruption practices in the SNTA sectors.

- Legislative technical assistance in law to adopt anti-corruption compliance policies and practices in the private sector.
- Design and implement inter-institutional agreements of commitment to transparency and anti-corruption policies.

Activities related to Output 1.2: Effective management of corruption risks is promoted and improved in prioritized departments

- Design and implement internal control and corruption risk management plans in public entities.
- Conduct an exchange of experiences at the regional and international level to promote the complementarity of internal, external, and social controls.
- Develop and disseminate a manual of suggested corruption risk management actions along with a list of possible corruption offenses.
- Legislative technical assistance on a law to strengthen internal control and anti-corruption risk management.

Activities related to Output 1.3: The VI Open State Action Plan of Honduras is co-created with the effective participation of the multi-stakeholder forum

- Establish the multi-stakeholder forum with organizations from civil society, the economic and productive sector, academia, and the public sector.
- Design and validate the VI Open State Action Plan of Honduras (VI PAEAH).
- Conduct awareness-raising, public consultation, and socialization workshops in the prioritized departments.
- Conduct workshops with institutions implementing the VI PAEAH.
- Design and establish gender sensitive monitoring and evaluation mechanisms.

Activities related to Output 2.1: The implementation of System 130 is supported in prioritized departments.

- Implement and disseminate the System 130 Management Protocol.
- Design and implement a certification program to manage the citizen complaint system (ISO 37002).
- Conduct an exchange of experiences with other citizen corruption reporting systems.
- Equip the Public Prosecutor's Office with specialized software for investigating corruption cases.
- Support reporting capacities on the number of complaints received, the treatment given, and the typologies identified.

Activities related to Output 2.2: Improved and more accessible citizen reporting to optimize the effective management of risks and corruption cases.

- Develop and disseminate comprehensive awareness, sensitization, and training campaigns for citizens, encouraging the reporting of corruption cases and the reporting of stolen assets, ensuring that information reaches hard-to-reach population.
- Legislative technical assistance in designing the law and regulatory framework for protecting victims, witnesses, and whistleblowers of corruption.
- Establish a network of trainers with institutional links on citizen reporting of corruption cases and whistleblower protection measures.
- Design and implement a training program for handling reports of corruption cases and whistleblower protection measures.
- Improve the technological platform of the Institute of Access to Public Information. Improve capacities to report, identify, and investigate and follow-up on judicial processes of presumed corruption cases including public sector (finances, civil servants etc.)

Activities related to Output 2.3: Corruption risk management plans in the private sector are strengthened and simplification of administrative procedures are simplified in prioritized departments.

- Design corruption risk matrices and anti-corruption plans in the economic sectors with the most reported cases.
- Design and implement a training program for the private sector on the construction of ethics and anti-corruption plans.
- Conduct a diagnosis to simplify administrative procedures and present a proposal for improvement in 5 prioritized entities.
- Design and implement a training program in the prioritized entities and with representatives of the private sector.

Activities related to Output 2.4: Internal protocols and regulatory tools for citizen oversight, as well as the reporting-punishment process are strengthened.

- Analyse the internal regulations to ensure that the competent authorities investigate reports.
- Establish protocols and improve internal regulations to link reporting area activities with investigation and punishment area activities.
- Design a proactive transparency strategy that allows citizens to oversee the outcomes of the reporting-punishment process.

Activities related to Output 3.1: The capacities of the CCTs and authorities in terms of rights to access information, transparency, accountability, and anti-corruption are strengthened.

- Design and implement the protocol for selecting and regulating the CCTs in the prioritized departments.
- Create a network of CCT trainers in access to information right, transparency, accountability, and anti-corruption.
- Design and implement a training plan with the network of CCT trainers.

Activities related to Output 3.2: The design of municipal transparency programs to encourage citizen participation in decision-making processes is promoted.

- Design and implement municipal transparency programs with the CCTs in the prioritized departments.
- Facilitate meetings between the CCTs and government representatives to discuss issues of public interest.
- Create spaces for dialogue and consultation with CCTs and local authorities.
- Design and implement sensitization and awareness campaigns to encourage citizen participation.

Activities related to Output 3.3: Increased citizen oversight of public infrastructure projects for monitoring and control of public management, including particularly vulnerable population groups.

- Carry out a mapping of infrastructure projects being implemented and executed, including a diagnosis of national infrastructure needs.
- Create a citizen module that applies the open contracting standard for infrastructure data (OC4IDS) and publish information on infrastructure projects in open formats on the National Open Data Portal (PNDA).
- Develop and implement a protocol for citizen oversight and control of public works in the prioritized departments.
- Conduct an awareness and training campaign on citizen oversight and control protocol and use the citizen module in infrastructure projects.
- Conduct field visits to monitor the progress and compliance of projects to present and discuss the results of citizen oversight.

3.3 Mainstreaming

Environmental Protection & Climate Change

Environmental protection and climate change are relevant aspects to be addressed within the Action. Importantly, in Outcome 1, support for implementing the ENTAH and the PAEAH contributes to the fight against climate change by promoting more transparent and accountable management of natural resources and environmental policies. These initiatives ensure that the allocation and use of funds earmarked for climate change mitigation and adaptation projects are effectively monitored and executed, reducing the risk of corruption and misappropriation. An example of these policies is commitment 5 of the PAEAH, "Strengthening access to information, participation and access to justice in environmental matters in Honduras (Escazú Agreement)."

According to Article 25.5 of the NDICI-Global Europe Regulation, and the Mainstreaming Guidelines - integrating environment and climate change EU international cooperation, it is not necessary to prepare a Strategic Environmental Assessment (SEA) or an Environmental Impact Assessment (EIA) (the action qualifies as Category C), nor a Climate Risk Assessment (CRA).

Gender equality and empowerment of women and girls

According to the OECD Gender DAC codes identified in section 1.1, this Action is labelled as G1. This implies that gender equality is an important objective of the Action, in all its outcomes. Primarily, by supporting the implementation of the ENTAH and the PAEAH, this action contributes to fostering inclusive citizen participation, creating an environment where women and girls can influence the policies that affect their lives, advancing their empowerment and ensuring that their needs and rights are considered and protected at all levels of governance. An example of such policies is commitment 9 of the EAPHR "Implementation of the Parity Principle in the Public Sector".

Human Rights

Human rights are an important objective in all proposed outcomes. By combating corruption and promoting accountability, human rights institutions are strengthened, ensuring that public resources are used to provide essential services and protect vulnerable groups. In addition, citizen participation and inclusion in decision-making fosters greater equity and social justice, ensuring that public policies respond to the needs of all people, especially the most vulnerable.

Finally, promoting citizen reporting of corruption practices is inherently a human rights issue, as whistleblowers, civil society organizations and investigative journalists need protection to fulfill their role of control and voice their concerns on such issues. The technical advice provided through this Action will include expert advice on the legislation needed to ensure such protection. This component will also include specific activities to address this issue at regional level.

Disability

According to the OECD DAC Disability Codes identified in section 1.1, this Action is labelled as D0. This implies that the Action is not considered relevant for inclusion of persons with disabilities.

Reduction of inequalities

According with the Inequality Marker Guidelines, the action is not considered relevant for inequality reduction, thus it is labelled as I-0.

Nevertheless, reducing inequalities is an indirect objective in all outcomes. Implementing both the ENTAH and the PAEAH contributes to reducing inequalities by advancing equitable access to public information and State resources, ensuring that government decisions and policies are more inclusive and reflect the actual needs of the population at large. Increased transparency and accountability minimize corrupt practices that divert resources from essential services like health, education and infrastructure, which are vital for the well-being of the most

vulnerable sectors. Moreover, citizen participation and the active oversight of public management makes it possible to ensure that voices from marginalized communities are heard and taken into account when decisions are made, thereby promoting a fairer and more equitable distribution of the benefits of development.

Democracy

Democracy is an important objective in all its outcomes. The implementation of the ENTAH and the PAEAH have a significant impact on the country's democracy in several ways:

Strengthening Transparency: The strategy and the plan push for transparency in public institutions by requiring the disclosure of pertinent and accessible information on their activities, budgets and decisions. This allows citizens to monitor and evaluate government actions, thus decreasing opportunities for corruption.

Accountability: Both instruments champion accountability, obligating public officials to justify their decisions and actions. This creates an environment where bad practices are more easily detected and punished, thus deterring corrupt behavior.

Citizen Participation: The PAEAH encourages citizen participation by creating pathways for citizens to become involved in decision making and overseeing public policies. By including civil society in these processes, public management is more democratic and ensures that decisions reflect the population's needs and wishes.

Increased Trust in Institutions: By increasing transparency and accountability, these initiatives help build citizens' trust in State institutions. Greater trust in institutions is key to democratic stability as it bolsters the legitimacy of the government and mitigates skepticism and social discontent.

Preventing and Fighting Corruption: The ENTAH includes specific measures to prevent and fight corruption, such as implementing audit and internal control systems, as well as building the skills and competencies of the agencies in charge of prosecuting corruption-related offenses. These actions are essential to uphold the integrity of democracy and to ensure that public resources are used appropriately.

Education and Public Awareness: Both initiatives also seek to educate and raise public awareness of transparency and anticorruption issues. By advocating a culture of integrity and ethics, citizens are empowered to demand a more transparent and accountable government.

Conflict sensitivity, peace and resilience

Conflict sensitivity, peace, and resilience are essential objectives in all outcomes of this Action, which contribute to the achievement of SDG 16 (Peace, security, and strong institutions), particularly the following targets: 16.3 Promote the rule of law at the national and international levels and ensure equal access to justice for all. By 2030, significantly reduce illicit arms and financial flows, reduce illicit arms and financial flows, and provide equal access to justice for all. 16.4. By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets, and combat all forms of organized crime; 16.5. Substantially reduce corruption and bribery in all its forms; 16.5.

Disaster Risk Reduction

N/A

3.4 Risks and Lessons Learnt

| Category | Risks | Likelihood (High/Medium/Low) | Impact (High/Medium/Low) | Mitigating measures |
|--|---|------------------------------|--------------------------|--|
| Category 1 - Risks related to the external environment | Risk of political tensions among key stakeholders | High | High | <ul style="list-style-type: none"> Stakeholders can choose between different cooperation schemes and actions do not necessarily concern all departments of the country. |
| Category 1 - Risks related to the external environment | Political instability within the beneficiary entities | High | High | <ul style="list-style-type: none"> Design a contingency plan to identify possible solutions . |
| Category 1 - Risks related to the external environment | Interinstitutional tensions due to lack of clarity in institutions' mandates or lack of capacity for mandates' implementation | High | High | <ul style="list-style-type: none"> Identify opportunities for institutional strengthening. Coordinate with complementary Actions implemented by other partners. Choose to create instruments only if capacity for implementation exists or is created with the Action. |
| Category 1 - Risks related to the external environment | Lack of consensus among counterparties | Medium | Medium | <ul style="list-style-type: none"> Facilitate smooth communications between all parties in implementing activities to promote transparency and clarity. Emphasize dialogue and negotiation when disputes arise. |
| Category 1 - Risks related to the external environment | Lack of commitment to implement the action | Low | Medium | <ul style="list-style-type: none"> Partners can choose between different levels of partnership, and participation is voluntary. |
| Category 1 - Risks related to the external environment | Limited engagement in favor of gender equality and the empowerment of women, a human rights-based approach, by the targeted institutions and non-state actors | Medium | Medium | <ul style="list-style-type: none"> The project will provide adequate resources to work with institutions and non-state actors on the importance of integrating gender equality, and a human rights-based approach. |
| Category 3 People and organizational risks | Security risk threats to citizens of CSOs (and their sources) for exposing acts of corruption or illegal activities (Outcomes 2 and 4). | Medium | High | <ul style="list-style-type: none"> Working closely with counterparts to identify acts of corruption that are not prosecutorial in nature, thereby reducing the risk of exposure to backlash as a result of reporting or otherwise uncovering such acts of corruption. Proactively engage other initiatives that may be working on or facilitating the implementation of whistleblowing measures. |

Lessons Learnt:

While initiatives aimed at improving the investigation, prosecution, and sentencing of acts of corruption are helpful, their impact remains limited if they are not combined with a greater focus on preventing acts of corruption.

So far, Honduras has paid too little attention to preventive actions and the value of “transparency”. However, good practices have shown that societies and cultures that promote transparency and ethical conduct in government work, as well as the empowerment of citizens to report acts of corruption, produce better results and further cultivate respect for the rule of law.

To improve the investigation of acts of corruption, efforts should be supported to encourage the reporting of acts of corruption. This includes policies and best practices to promote the general public participation and empower civil society organizations and investigative journalists to bring these issues to the public agenda and to the attention of authorities and policymakers. This also means parallel policies that aim to protect whistleblowers (and may include mechanisms to allow anonymous reporting).

Similarly, corruption, like many other for-profit crimes, cannot be combated without corresponding efforts to capture assets linked to such corruption. Any modern, comprehensive anti-corruption initiative must include technical advice on good policies and practices for seizing and confiscating the fruits of any corrupt acts; otherwise, corruption will continue to persist and proliferate.

Convictions often take several years to be finalized. This dynamic lends itself to a public perception, usually justified, that justice systems are too slow to confiscate illicitly obtained assets. While anti-corruption initiatives should continue to include support for the criminal justice process, such initiatives should no longer exclude the wide variety of non-criminal tools for seizing and confiscating assets linked to corruption.

In addition, an important lesson learned from anti-corruption initiatives is that many initiatives do not address the underlying lack of interagency and national cooperation needed to prevent and prosecute acts of corruption. This is often due to poorly structured and unnecessarily overlapping institutional mandates and poor or non-existent mechanisms to incentivize cooperation.

An inherent and underlying sub-objective of this initiative will be to facilitate and encourage interagency and national cooperation among entities charged with preventing, investigating and prosecuting acts of corruption, entities involved in cross-border cooperation on the subject, and entities involved in the seizure and confiscation of assets linked to corruption.

Anti-corruption initiatives in Honduras have not focused on promoting the adoption of policies and practices that allow or facilitate citizens and civil society organizations (OSC) to report acts of corruption and assets linked to corruption.

3.5 The Intervention Logic

As a multifaceted phenomenon, corruption must be addressed by means of different approaches. Hence, it is necessary to strengthen public institutions and endow them with the capacities needed to effectively prevent, control and punish acts of corruption while involving civil society and the private sector in these activities.

To this end, the intervention rationale underlying this action is causal. In other words, four fundamental areas of intervention with a direct connection to the expected outcomes are identified in order to begin yielding results in curbing corruption:

1. **Institutional:** To harness and uphold the Honduras National Transparency and Anticorruption Strategy to strengthen transparency, citizen participation and risk management mechanisms, such as preventive measures for curbing corruption in the selected public institutions, in addition to implementing actions to investigate, detect and punish administrative corruption.

This point contributes to achieving Outcome 1. Strengthen institutional mechanisms to develop and implement comprehensive policies to promote transparency, prevent and punish corruption from a human rights-based approach.

2. **Participatory:** To consolidate strategic multi stakeholder alliances originating from the creation of the Open Government Partnership PAEAH, which give rise to specific transparency and anticorruption commitments that contribute to involving society and the private sector in the fight against corruption, particularly in the form of Citizen Transparency Commissions.

This point contributes to achieving Outcome 3. Improve the mechanisms for citizen participation by creating and promoting spaces for dialogue with Citizen Transparency Commissions and increase oversight of public infrastructure projects.

3. **Technological:** To use technological infrastructure to report acts of corruption, by providing a regulatory, procedural and digital framework to simplify the work of processing citizen reports and oversight the corresponding investigation and punishment processes while improving procedures and public services to prevent corruption at points of contact between society and the government.

This point contributes to achieving Outcome 2. Improve the systems for citizen reporting and oversight of acts of corruption through digitalization to increase simplification of administrative procedures and improve asset recovery and Outcome 3. Improve the mechanisms for citizen participation by creating and promoting spaces for dialogue with Citizen Transparency Commissions and increase oversight of public infrastructure projects.

4. **Issue-centred:** Public infrastructure projects are a fertile breeding ground for corruption. Therefore, improving citizen participation in overseeing the contracting process and the construction of government public works will contribute to setting transparency and citizen oversight standards and protocols capable of deterring acts of corruption.

This point contributes to achieving Outcome 3. Improve the mechanisms for citizen participation by creating and promoting spaces for dialogue with Citizen Transparency Commissions and increase oversight of public infrastructure projects.

As it can be seen, the approach to the fight against corruption will be holistic and will cover the entire chain, from the prevention, detection, and monitoring of acts of corruption to their investigation and prosecution, leading towards increased accountability and integrity in public management. Greater emphasis will be placed on civil society's role in improving transparency and good governance. Awareness raising and training are essential steps in implementing the Action.

All results will be jointly considered and developed, while ensuring that the specific actions of national authorities and of the other actors involved complement each other, especially those aiding in the implementation of anti-corruption public policies so as not only to avoid duplication, but also to enhance their impact. The approach will be of a more practical nature: advising on concrete cases and helping to ensure that prosecutors and national authorities will also collaborate in identifying and recovering assets obtained from corruption.. It will also explore a wide range of non-criminal tools to maximize efficiency and produce tangible and practical results in terms of enhanced transparency in the public and private sectors. The program will be backed by the United Nations Office on Drugs and Crime.

This will help capitalize on the combined expertise and field presence in the country. Throughout the action, close cooperation will be maintained with other cooperation agencies and will be coordinated with other EU-funded projects and activities of other partners active in the country. Digital technology will be a crosscutting and cohesive element of the results of this action. The action will ensure that the beneficiaries are well-trained and well-equipped to teach the appropriate use of these new technologies and generate the proper content to merge technology and the activities of the action. For this reason, the transversality of technology will be used as a cohesive element that should enhance beneficiaries' creativity, knowledge, and experience.

3.6 Logical Framework Matrix

| Results | Results chain (@): Main expected results (maximum 10) | Indicators (@): (at least one indicator per expected result) | Baselines (values and years) | Targets (values and years) | Sources of data | Assumptions |
|------------------|---|---|---|---|---|---|
| Impact | To contribute to good governance in public management by increasing institutional integrity and accountability, strengthening the administrative framework, the capacity to prevent and combat corruption and improve asset recovery as well as improving the role of civil society in their advocacy, oversight and civil role in anti-corruption efforts. | <ol style="list-style-type: none"> 1 GERF - WJP- Rule of Law Score. Factor: absence of corruption. 2 Number of mechanisms for the accountability of the Honduran State at the national and regional levels that contributes to improve the policies for the anticorruption efforts. 3 Number of ENTAH sectors that have implemented their work plans at least for %, in line with ENTAH and PAEAH. 4 Number of cases of illicit assets of corruption | <p>1: 0.32 (2023)</p> <p>(0 weaker, 100 stronger)</p> <p>2: 0 (2025)</p> <p>3: 0 (2025)</p> <p>4: 0 (2025)</p> | <ol style="list-style-type: none"> 1. 0.36 (2028) 2. 10 (2028) 3. 4 at least 70% (2028) 4. At least 10 cases (2028) | <ol style="list-style-type: none"> 1. Databases of Rule of Law Index, specifically, absence of corruption factor (Annual periodicity) 2. ENTAH Reports and informs 3. CCT reports, ENTAH, and AGAH implementation reports. 4. ENTAH Reports and informs | <i>Not applicable</i> |
| Outcome 1 | Institutional mechanisms to develop and implement comprehensive policies, promoting transparency, preventing and sanctioning corruption from a human rights based and gender equality approach are strengthened. | <ol style="list-style-type: none"> 1.1 GERF - Worldwide Governance Indicators: government effectiveness. 1.2 Number of gender and human rights sensitive anti-corruption public policies (ENTAH and PAEAH 2023-2025) strengthened. 1.3 Number of gender and human rights based participatory mechanisms that works as an oversight or advisory space. 1.4 Number of consultations by partner government at national and local level with women's rights organizations engaged in law reform (GAP III) | <p>1.1: -0.87 (2022) (-2.5 weaker, 2.5 stronger)</p> <p>1.2: 0 (2025)</p> <p>1.3: 0 (2025)</p> <p>1.4: 0 (2025)</p> | <ol style="list-style-type: none"> 1.1. TBD 1.2. 10 (2028) 1.3. At least 5 (2028) 1.4 At least 8 (2028) | <ol style="list-style-type: none"> 1.1 World Bank Indicators, specifically, control of government effectiveness (Annual periodicity) 1.2 Strategies and policies approved. Reports of STLCC. 1.3 CCT reports, ENTAH, and AGAH implementation reports. | The SNTA must operate effectively to reduce impunity and guarantee more efficient public management, which is socially, politically, and institutionally necessary. |

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| | | | | | 1.4 Internal reports | |
| Output 1 relating to Outcome 1 | 1.1. The National System for Transparency and the Fight against Corruption (SNTA) is supported in prioritized departments | 1.1.1 Number of plans implemented in the prioritized departments 1.1.2 Number of beneficiaries (disaggregated by sex, age) trained. | 1.1.1: 0 (2025) 1.1.2: 0 (2025) | 1.1.1 5 (2028) 1.1.2 1000 (2028) | 1. Report on approved work plans, curriculum, Training reports, draft legislation, cooperation agreements, campaign reports, awareness-raising campaigns, etc. 2. CCT reports, ENTAH, and AGAH implementation reports. | There is a social, political, and institutional need for the SNTA to operate effectively, reducing impunity and guaranteeing more efficient public management. |
| Output 2 relating to Outcome 1 | 1.2. Effective management of corruption risks is promoted and improved in prioritized departments | 1.2.1 Numbers of internal control and risk management plans designed and implemented in prioritized departments. 1.2.2 Number of beneficiaries (disaggregated by sex, age) have been trained. | 1.2.1: 0 (2025) 1.2.2: 0 (2025) | 1.2.1 5 (2028) 1.2.2 1000 (2028) | Internal control plans and implementation reports, curriculum, Training reports, draft legislation, cooperation agreements, campaign reports, awareness-raising campaigns, etc. | National and regional authorities are committed to improving internal control in public management. More effective internal control helps detect irregularities that need to be visibly sanctioned (sanction effect) to have preventive effects and to detect weaknesses and vulnerabilities in the entities continuously. |

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| <p>Output 3 relating to Outcome 1</p> | <p>1.3 The VI Open State Action Plan of Honduras is co-created with the effective participation of the multi-stakeholder forum</p> | <p>1.3.1 Number of transparency, citizen participation and accountability initiatives included in the VI Action Plan to be implemented in 5 departments.</p> <p>1.3.2 Number of vulnerable sectors and communities included in the co-creation process.</p> <p>1.3.3 Number of monitoring and evaluation mechanisms established.</p> <p>1.3.4 Number of citizen proposals (disaggregated by sex, age) included in the PAEAH</p> | <p>1.3.1: 0 (2025)</p> <p>1.3.2: 2 (2025)</p> <p>1.3.3: 1 (2025)</p> <p>1.3.4 14 (2025)</p> | <p>1.3.1 5 (2028)</p> <p>1.3.2 4 (2028)</p> <p>1.3.3 2 (2028)</p> <p>1.3.4 At least 5 (2028)</p> | <p>Report on approved work plans, curriculum, Training reports, draft legislation, cooperation agreements, campaign reports, awareness-raising campaigns, etc.</p> <p>CCT reports, ENTAH, and AGAH implementation reports.</p> <p>IRM report</p> | <p>Multi-stakeholder forum participation is necessary to break corruption, avoid concentration of power, and facilitate sustainable change.</p> |
| <p>Outcome 2</p> | <p>Improved systems improve for gender sensitive citizen reporting and oversight of acts of corruption through digitalization to simplify administrative procedures and improve asset recovery.</p> | <p>2.1 Number of citizens (disaggregated by sex, age) complaints processed.</p> <p>2.2 GERF - WJP-Rule of Law Index: criminal justice factor</p> <p>2.3 Number of risk management plans implemented.</p> <p>2.4 Number of assets recovery procedures improved</p> <p>2.5 *MIP indicator Percentage of Strategic Institutional Plans of Central Government Institutions that includes gender perspective</p> | <p>2.1: 0 (2025)</p> <p>2.2: 26 (2024) (0 weaker, 100 stronger)</p> <p>2.3: 0 (2025)</p> <p>2.4: 0 (2025)</p> <p>2.5: 4.8% (5 over 104) (2020)</p> | <p>2.1 20 (2028)</p> <p>2.2 30 (2028)</p> <p>2.3 5 (2028)</p> <p>2.4 5 (2028)</p> <p>2.5 30% (29 over 104) (2027)</p> | <p>Reports on the System 130 Reporting and its implementation, legislation reforms, training program and corruption risk management plans, awareness campaigns and their implementation.</p> <p>Databases of Rule of Law Index, specifically criminal justice factor (Annual periodicity)</p> <p>Government of Honduras</p> | <p>A higher number of complaints with visible consequences (deterrent effect of the sanction) increases the ex-ante risk of committing acts of corruption and contributes to reducing corruption (preventive effect).</p> |
| <p>Output 1 relating to Outcome 2</p> | <p>2.1. The implementation of the Citizen Complaint Management System (System 130) is supported in prioritized departments.</p> | <p>2.1.1 Number of entities implementing System 130.</p> <p>2.1.2 Number of reports of corruption complaint management</p> | <p>2.1.1: 0 (2025)</p> <p>2.1.2: 0 (2025)</p> | <p>2.1.1: 50 (2028)</p> <p>2.1.2: 2 (2028)</p> | <p>Reports on complaints and implementation of System 130, training programme and corruption risk management plans, awareness-raising campaigns and implementation reports</p> | <p>Civil servant training raises awareness of the problem of corruption, provides guidelines for ethical decision-making, has positive effects on the working environment, and facilitates real change in institutions.</p> |

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| Output 2 relating to Outcome 2 | 2.2 Improved citizen reporting to optimize the effective management of risks and corruption cases | 2.2.1 Number of beneficiaries (disaggregated by sex, age) of awareness and training campaigns. | 2.2.1: 0 (2025) | 2.2.1 3000 (2028) | legislative reforms, training programme and corruption risk management plans, awareness-raising campaigns and implementation reports, Training and implementation reports | There is political will to enact a legal framework to protect victims, whistleblowers, and witnesses of corruption. |
| Output 3 relating to Outcome 2 | 2.3 Corruption risk management plans in the private sector are strengthened and simplification of administrative procedures are simplified in prioritized departments. | 2.3.1 Number of corruption risk management plans designed and disseminated. | 2.3.1: 0 (2025) | 2.3.1 10 (2028) | Risk matrices, anti-corruption plans, training programme and their evaluation, diagnosis, and proposal of administrative simplification processes. | The private sector is critical to achieving change as it is an integral part of the problem and the solution. |
| Output 4 Relating to outcome 2 | 2.4 Internal protocols and regulatory tools for citizen oversight, as well as the reporting-punishment process are strengthened. | 2.4.1 Number of diagnostics of internal regulations 2.4.2 Number of internal normative strengthened 2.4.3 Number of oversight - accountability exercises | 2.4.1: 0 (2025) 2.4.2: 0 (2025) 2.4.3: 0 (2025) | 2.4.1 3 (2028) 2.4.2 5 (2028) 2.4.3 10 (2028) | Diagnostic carried out with the participation of civil society and the results of the accountability exercise. | Political will and participation of civil society. |
| Outcome 3 | Improved mechanisms for inclusive and gender based citizen participation in designated spaces for dialogue with the Citizen Transparency Commissions and increase oversight of public infrastructure projects. | 3.1 Number of interventions in which the citizens can oversight some infrastructure projects 3.2 Number of CCTs improved in terms of rights to access information, transparency, accountability, and anti-corruption 3.3 MIP and GERF indicator - Worldwide Governance Indicators: voice and accountability | 3.1: 0 (2025) 3.2: 5 (2024) 3.3: -0.49 (2023) (-2.5 weaker, 2.5 stronger) | 3.1 30 (2028) 3.2 25 (2028) 3.3 0 (2027) | CCT reports, training programs, implementation reports, a web portal with an information module, the open contracting standard for infrastructure data (OC4IDS), municipal transparency programs, and a citizen control protocol. World Bank Indicators, specifically, voice and accountability dimension (Annual periodicity) | Reducing corruption risks and improving governance in priority sectors allows society to benefit from improved performance in these sectors. Knowledge of the vulnerabilities and where they are in specific areas of infrastructure projects allows for the design of more efficient and effective countermeasures. |

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|--|--|---|--|---|---|--|
| <p>Output 1 relating to Outcome 3</p> | <p>3.1 The capacities of the CCTs and authorities in terms of rights to access information, transparency, accountability, and anti-corruption are strengthened.</p> | <p>3.1.1 Number of awareness-raising and training day on the protocol is held in the 7 prioritized departments.</p> <p>3.1.2 Number of people (disaggregated by sex, age) are trained in the use of the protocol.</p> | <p>3.1.1: 0 (2025)</p> <p>3.1.2: 0</p> | <p>3.1.1 7 (2028)</p> <p>3.1.2 2000 (2028)</p> | <p>Municipal transparency programs, minutes of meetings, dialogue spaces, sensitization and awareness campaigns and implementation reports.</p> | <p>External control keeps governments' political interests alive, consistent, and continuous in following the anti-corruption policies initiated and prevents setbacks in their implementation.</p> |
| <p>Output 2 relating to Outcome 3</p> | <p>3.2 The design of municipal transparency programs to encourage citizen participation in decision-making processes is promoted.</p> | <p>3.2.1 Number of municipal transparency programs approved in priority departments.</p> <p>3.2.2 Number of civic spaces created.</p> <p>3.2.3 Number of people (disaggregated by sex, age) per department made aware of the campaign to encourage citizen participation.</p> | <p>3.2.1: 0 (2025)</p> <p>3.2.2: 0 (2025)</p> <p>3.2.3: 0 (2025)</p> | <p>3.2.1 5 (2028)</p> <p>3.2.2 5 (2028)</p> <p>3.2.3 200 (2028)</p> | <p>Municipal transparency programs, minutes of meetings, dialogue spaces, sensitization and awareness campaigns and implementation reports.</p> | <p>Improved access to reliable, comprehensive, timely, understandable, and comparable information on corruption and municipal transparency facilitates social control by interested citizens, civil society, and CCTs.</p> |
| <p>Output 3 relating to Outcome 3</p> | <p>3.3 Increased citizen oversight of public infrastructure projects for monitoring and control of public management, including particularly vulnerable population groups.</p> | <p>3.3.1 By the end of 2028, the citizen module with OC4IDS standard will be in place.</p> <p>3.3.2 Number of beneficiaries (disaggregated by sex, age) have been trained in the awareness-raising campaign and citizen oversight and control protocol.</p> | <p>3.3.1: 0 (2025)</p> <p>3.3.2: 0 (2025)</p> | <p>3.3.1 1 (2028)</p> <p>3.3.2 1000 (2028)</p> | <p>Mapping of infrastructure projects under execution and implementation, and diagnosis of national infrastructure needs, citizen module applying the open contracting standard for infrastructure data (OC4IDS), a protocol for citizen oversight and control of public works, awareness campaign and implementation report, protocol of audits and training and citizen control report and reports of field visits.</p> | <p>More transparent management of information and execution of public infrastructure projects reduces the risk of corruption.</p> |

4 IMPLEMENTATION ARRANGEMENTS

4.1 Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with Honduras.

4.2 Indicative implementation period

The indicative implementation period of this action, during which the activities described in Section 3 of this document will be carried out, is 60 months from the date of adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3. Implementation Modalities

The Commission will ensure that the EU rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures¹⁴.

4.3.1 Direct Management (Grants)

Grants: direct management

(a) Purpose of the grant(s)

The specific objective 3) to *'improve inclusive and gender sensitive mechanisms for citizens' participation [...] and increasing oversight over public infrastructure projects'* will be implemented also through a series of grants for civil society organizations with the purpose to reinforce the role of civil society in contributing to implement the systems for citizen complaints and follow-up of acts of corruption. The grants will aim to implement primarily Outcome 3 but will also contribute to the achievement of outcome 2).

(b) Type of applicants targeted

The beneficiaries of the grant will be international and/or national NGOs, as well as public bodies established in Honduras and having experience in implementing projects on anti-corruption, transparency, citizen participation and policy dialogue with authorities.

The part of the action under the budgetary envelope reserved for grants may, partially or totally and including where an entity is designated for receiving a grant without a call for proposals, be implemented in indirect management with an entity, which will be selected by the Commission's services using the criteria mentioned under the paragraph 4.3.2.

4.3.2 Indirect Management with an entrusted entity

A part of this action may be implemented in indirect management with United Nations Office on Drugs and Crime (UNODC). The implementation by this entity entails: a) strengthening of institutional mechanisms to develop and implement comprehensive policies, promoting transparency, preventing and sanctioning corruption from a human rights based and gender equality approach – Outcome 1, and b) creating and/or improving systems for gender sensitive citizen complaints and follow-up of acts of corruption through digitalization to increase simplification of administrative and asset recovery procedures – Outcome 2.

The envisaged entity has been selected using the following criteria:

¹⁴ www.sanctionsmap.eu. Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

a) General mandate, technical and operational expertise in the sector of transparency and fight against corruption

As guardianship of the United Nations Convention against Corruption (UNCAC) and the United Nations Convention on Transnational Organized Crime (UNTOC), its three protocols, and its expertise in providing technical assistance to states, UNODC is an important political and strategic interlocutor and can will play a pivotal role as a critical implementer for the implementation of this Action. To help stop and fight corruption, economic fraud, and identity-related crimes, UNODC has created several tools, manuals, and publications. They are also constantly developing new ones to improve knowledge of the challenges, policies, and best practices in implementing UNCAC, especially based on what the Review Mechanism says is needed. These tools can be adapted to regional and national needs upon request.

b) Working methods and capacity for multi-stakeholder coordination

The core of UNODC's work is joining forces with governments, anti-corruption practitioners, the private sector, and civil society, including youth and academia, to address corruption at all levels and restore trust where it has been eroded. UNODC has supported the Government of Honduras in legislative reforms and capacity building in areas specifically related to corruption and transparency. It provided technical support to the Government of Honduras in designing the National Transparency and Anti-Corruption Strategy and the Open State Action Plan of Honduras (2023-2025), together with EU support. In these anti-corruption public policy documents, UNODC achieved the integration of the actors of the National Transparency and Anti-Corruption System and validated the process in all departments of the country.

c) Presence on the ground

In recent years, UNODC has expanded its presence on the ground to bring its support closer to the point of delivery. Through Regional Anti-Corruption Platforms and Hubs, and enhanced field-based activities and respond faster to the anti-corruption priorities and technical assistance needs identified at the regional and country levels. In 2023, UNODC launched the Central American platform in Honduras to accelerate the UNCAC implementation, comprising six countries: Costa Rica, El Salvador, Guatemala, Honduras, Panama, and the Dominican Republic. These joint and tailored efforts accelerate the implementation of the UN Convention against Corruption.

d) Innovative approach aligned to the Global Gateway Strategy

In 2023, UNODC started to analyse the impact of corruption on global efforts to respond to climate change. The aim is to integrate anti-corruption considerations into the international climate policy agenda, highlighting the need to tackle corruption to reach international climate goals. Under this new initiative, UNODC aims to prevent corruption that worsens the causes and consequences of climate change. Finally, UNODC's value is enshrined in its vision. Only by uniting against corruption and implementing a whole-of-government and societal approach can state parties accelerate the implementation of UNCAC and the Sustainable Development Goals (SDGs), fostering the path to more inclusive and resilient societies. In line with the Global Gateway Investment Agenda in Honduras, UNODC will promote high-standard and transparent infrastructure partnership with an increased citizen oversight of public infrastructure GG projects, thus improving climate resilience and addressing corruption risks in climate finance and action.

In case the envisaged entity would need to be replaced, the Commission's services may select a replacement entity using the same criteria. If the entity is replaced, the decision to replace it needs to be justified.¹⁵

4.3.3 Changes from indirect to direct management mode (and vice versa) due to exceptional circumstances (one alternative second option)

In case negotiations with the proposed entity for the implementation of activities under Outcomes 1 and 2, in indirect management fail, the same may be implemented in direct management through grants awarded through call for proposals with international/national NGOs or public bodies established in Honduras and demonstrated capacity to achieve the same level of results.

¹⁵ It is reminded that, during the implementation of the action, in case it is decided to select another entity, the same criteria may be used for justifying such selection, without going through a substantial modification of the Financing Decision. Consequently, beyond the justifications provided for selecting a given entity, it is important to define clear selection criteria.

4.4. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realization of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

4.5 Indicative Budget

| Indicative Budget components¹⁶ | EU contribution (amount in EUR) |
|--|--|
| Implementation modalities – cf. section 4.3 | |
| Objective 1. Strengthened institutional mechanisms to develop and implement comprehensive policies to promote transparency and prevent and sanction corruption. | 2,450,000 |
| Indirect management with UNODC - cf. section 4.3.2 | |
| Objective 2. Improved systems for gender sensitive citizen complaints and follow-up of acts of corruption through technology, to increase the simplification of administrative procedures and the asset recovery. | 2,100,000 |
| Indirect management with UNODC - cf. section 4.3.2 | |
| Objective 3. Improved mechanisms for inclusive and gender-based citizen participation through creating and promoting of spaces for dialogue with the Citizen Transparency Commissions (CCT) and increasing oversight of public infrastructure | 2,950,000 |
| Grants (direct management) – cf. section 4.3.1 | |
| Evaluation – cf. section 5.2 Audit – cf. section 5.3 | May be covered by another decision |
| Totals | 7,500,000 |

4.6 Organisational Set-up and Responsibilities

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action and may sign or enter into joint declarations or statements, for the purpose of enhancing the visibility of the EU and its contribution to this action and ensuring effective coordination.

The overall coordination for outcomes 1 and 2 will be performed by the EU Delegation and UNODC, as described below:

¹⁶ N.B: The final text on audit/verification depends on the outcome of ongoing discussions on pooling of funding in (one or a limited number of) Decision(s) and the subsequent financial management, i.e. for the conclusion of audit contracts and payments.

A project Steering Committee (PSC) will be established to oversee and to provide overall guidance to the implementation of the action.

The PSC will comprise of at least representatives of the EU Delegation, public bodies involved in the programme (in particular entities which are part of the National System) and the implementing partner. Meetings of the PSC will be convened twice a year, with the possibility to organize additional ad-hoc meetings whenever there is a need or a request. The implementing partner will assure the secretariat for the PSC.

A Technical Coordination mechanism (Programme Implementation Unit) will be set up at the beginning the programme with coordination meetings to be organized twice a year at least 3 weeks before the PSC, and on ad-hoc basis according to the needs. The PIU will be responsible for coaching, supporting and monitoring daily programme activities implemented by partners in the field.

Grants awarded through the call for proposals for the achievement of Outcome 3 will have to include in their proposal a governance structure in line with the intended activities.

A wider coordination mechanism covering all three outcomes will be promoted by the EU.

5. PERFORMANCE MEASUREMENT

5.1 Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the log frame matrix (for project modality) and the partner's strategy, policy or reform action plan list (for budget support).

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

Roles and responsibilities for data collection, analysis and monitoring: the implementing partners will be responsible for data collection, analysis, monitoring and reporting according to their specific contractual clauses.

All monitoring and reporting shall assess how the action is considering the principle of gender equality, human rights-based approach, and rights of persons with disabilities including inclusion and diversity. Indicators shall be disaggregated at least by sex whenever possible and meaningful and age and disability, where feasible.

5.2. Evaluation

Having regard to the importance and nature of the action, mid-term and final evaluations may be carried out for this action or its components via independent consultants contracted by the Commission.

A mid-term evaluation will be carried out for problem solving and learning purposes, in particular with respect to evolution of national institutions with regards to transparency and corruption perceptions in order to adjust activities if necessary.

A final evaluation will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that this Action is intended as an enabler for the implementation of the initiatives foreseen under the Global Gateway Strategy in Honduras.

The Commission shall inform the implementing partner at least 1 month in advance of the dates envisaged for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports may be shared with the partners and other key stakeholders following the best practice of evaluation dissemination¹⁷. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, apply the necessary adjustments.

Evaluations shall assess to what extent the action is taking into account the human rights-based approach as well as how it contributes to gender equality and women's empowerment. Expertise on human rights, disability and gender equality will be ensured in the evaluation teams.

The financing of the evaluation may be covered by another measure constituting a Financing Decision.

5.3 Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

The financing of the audit may be covered by another measure constituting a Financing Decision.

6. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

The 2021-2027 programming cycle will adopt a new approach to pooling, programming and deploying strategic communication and public diplomacy resources.

In line with the 2022 “[Communicating and Raising EU Visibility: Guidance for External Actions](#)”, it will remain a contractual obligation for all entities implementing EU-funded external actions to inform the relevant audiences of the Union's support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. This obligation will continue to apply equally, regardless of whether the actions concerned are implemented by the Commission, partner countries, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU member states.

However, action documents for specific sector programmes are in principle no longer required to include a provision for communication and visibility actions promoting the programmes concerned. These resources will instead be consolidated in Cooperation Facilities established by support measure action documents, allowing Delegations to plan and execute multiannual strategic communication and public diplomacy actions with sufficient critical mass to be effective on a national scale.

¹⁷ See best [practice of evaluation dissemination](#)

Appendix 1 REPORTING IN OPSYS

A Primary Intervention¹⁸ (project/programme) is a coherent set of activities and results structured in a logical framework aiming at delivering development change or progress. Identifying the level of the primary intervention will allow for:

Articulating Actions or Contracts according to an expected chain of results and therefore allowing them to ensure efficient monitoring and reporting of performance;

Differentiating these Actions or Contracts from those that do not produce direct reportable development results, defined as support entities (i.e. audits, evaluations);

Having a complete and exhaustive mapping of all results-bearing Actions and Contracts.

Primary Interventions are identified during the design of each action by the responsible service (Delegation or Headquarters operational Unit).

The level of the Primary Intervention chosen can be modified (directly in OPSYS) and the modification does not constitute an amendment of the action document.

The intervention level for the present Action identifies as (tick one of the 4 following options);

| | | |
|--|----------------------|--|
| Action level (i.e. Budget Support, blending) | | |
| <input type="checkbox"/> | Single action | Present action: all contracts in the present action |
| Group of actions level (i.e. top-up cases, different phases of a single programme) | | |
| <input type="checkbox"/> | Group of actions | Actions reference (CRIS#/OPSY#): <Present action> <Other action(s)> |
| Contract level | | |
| <input checked="" type="checkbox"/> | Single Contract 1 | To be defined |
| <input type="checkbox"/> | | |
| <input checked="" type="checkbox"/> | Single Contract 2 | To be defined |
| <input type="checkbox"/> | | |
| | (...) | |
| Group of contracts level (i.e. series of programme estimates, cases in which an Action includes for example four contracts and two of them, a technical assistance contract and a contribution agreement, aim at the same objectives and complement each other) | | |
| <input type="checkbox"/> | Group of contracts 1 | <foreseen individual legal commitment (or contract) 1> <foreseen individual legal commitment (or contract) 2> <foreseen individual legal commitment (or contract) #> |

¹⁸ For the purpose of consistency between terms in OPSYS, DG INTPA, DG NEAR and FPI have harmonised 5 key terms, including 'Action' and 'Intervention' where an 'Action' is the content (or part of the content) of a Commission financing Decision and 'Intervention' is a coherent set of activities and results which constitutes an effective level for the operational follow-up by the EC of its operations on the ground. See more on the [concept of intervention](#).

Appendix 2 COMMISSION DECISION & TECHNICAL and ADMINISTRATIVE PROVISIONS

Please delete this appendix before submitting the document.

The template of the AD is used selectively depending on the type of financing and step of the procedure.

The table below illustrates which sections of the AD need to be used

- in the annex to the COM Decision and,
- when applicable, in the Financing Agreement to create the Technical and Administrative Provisions (TAPs)
- The following table presents an overview of the use of the sections of the Action Document template for the Commission Decision and for the TAPs.

| Action Document | Project modality (Incl. thematic and regional programmes, as well as calls for proposals) | | Budget support | | No activities to be implemented by, and no funds to be transferred to, the Partner country, with signature of a Financing Agreement based of the 'simplified' template | |
|---|--|--|---------------------------|--|--|--|
| | Annex Commission Decision | Technical and Administrative Provisions (TAPs) | Annex Commission Decision | Technical and Administrative Provisions (TAPs) | Annex Commission Decision | Technical and Administrative Provisions (TAPs) |
| 1. SYNOPSIS | | | | | | |
| 1.1. Action Summary Table | Yes | Yes | Yes | Yes | Yes | N/A |
| 1.2. Summary of the Action | Yes | Yes | Yes | Yes | Yes | Yes |
| 2. RATIONALE | | | | | | |
| 2.1. Context | Yes | N/A | Yes | N/A | Yes | N/A |
| 2.2. Problem Analysis | Yes | N/A | Yes | N/A | Yes | N/A |
| 2.3. Additional Areas of Assessment [For Budget Support Actions only] | N/A | N/A | Yes | N/A | N/A | N/A |
| 2.3.1. Pre-condition on Fundamental values (for a SDG contracts only) | N/A | N/A | Yes | N/A | N/A | N/A |
| 2.3.2. Public Policy | N/A | N/A | Yes | N/A | N/A | N/A |
| 2.3.3. Macroeconomic Policy | N/A | N/A | Yes | N/A | N/A | N/A |
| 2.3.4. Public Financial Management | N/A | N/A | Yes | N/A | N/A | N/A |
| 2.3.5. Transparency and Oversight of the Budget | N/A | N/A | Yes | N/A | N/A | N/A |
| 3. DESCRIPTION OF THE ACTION | | | | | | |
| 3.1. Objectives and Expected Outputs | Yes | Yes | Yes | Yes | Yes | N/A |
| 3.2. Indicative Activities | Yes | Yes | Yes | Yes | Yes | N/A |
| 3.3. Mainstreaming | Yes | Yes | Yes | Yes | Yes | N/A |

| | Project modality (Incl. thematic and regional programmes, as well as calls for proposals) | | Budget support | | No activities to be implemented by, and no funds to be transferred to, the Partner country, with signature of a Financing Agreement based of the 'simplified' template | |
|---|--|--|---------------------------|---|--|--|
| Action Document | Annex Commission Decision | Technical and Administrative Provisions (TAPs) | Annex Commission Decision | Technical and Administrative Provisions (TAPs) | Annex Commission Decision | Technical and Administrative Provisions (TAPs) |
| 3.4. Risks and Lessons Learnt | Yes | N/A | Yes | N/A | Yes | N/A |
| 3.5. The Intervention Logic | Yes | Yes | Yes | Yes | Yes | N/A |
| 3.6. Logical Framework Matrix | Yes | Yes | Yes | Yes | Yes | N/A |
| 4. IMPLEMENTATION ARRANGEMENTS | | | | | | |
| 4.1. Financing Agreement | Yes | N/A | Yes | N/A | Yes | N/A |
| 4.2. Indicative Implementation Period | Yes | N/A | Yes | N/A | Yes | N/A |
| 4.3. Implementation of the Budget Support Component (and subsections) | N/A | N/A | Yes | Yes | N/A | N/A |
| 4.4. Implementation Modalities (and subsections) | Yes | Yes | Yes | Yes | Yes | N/A |
| 4.5. Scope of geographical eligibility for procurement and grants | Yes | Yes | Yes | Yes | Yes | N/A |
| 4.6. Indicative Budget | Yes | Yes | Yes | Yes | Yes | N/A |
| 4.7. Organisational Set-up and Responsibilities | Yes | Yes | Yes | Yes | If applicable and relevant | If applicable and relevant |
| 4.8. Pre-conditions [only for project modality] | Yes | Yes | Yes | N/A | Yes | If relevant and applicable |
| 5. PERFORMANCE MEASUREMENT | | | | | | |
| 5.1. Monitoring and Reporting | Yes | Yes | Yes | Yes | Yes | N/A |
| 5.2. Evaluation | Yes | Yes | Yes | Yes | Yes | N/A |
| 5.3. Audit and Verifications | Yes | Yes | Yes | Yes | Yes | N/A |
| 6. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY | | | | | | |
| 6. Strategic Communication and Public Diplomacy | Yes | Yes | Yes | Yes | Yes | N/A |
| APPENDICES | | | | | | |
| Appendix 1 Reporting in OPSYS | N/A | N/A | N/A | N/A | N/A | N/A |
| Appendix 2 Commission Decision and TAPs | Delete and replace with Appendix for Blending if applicable | N/A | N/A | Delete and replace with Appendix for Budget Support if applicable | N/A | N/A |

| | Project modality (Incl. thematic and regional programmes, as well as calls for proposals) | | Budget support | | No activities to be implemented by, and no funds to be transferred to, the Partner country, with signature of a Financing Agreement based of the 'simplified' template | |
|--|--|--|---------------------------|--|--|--|
| Action Document | Annex Commission Decision | Technical and Administrative Provisions (TAPs) | Annex Commission Decision | Technical and Administrative Provisions (TAPs) | Annex Commission Decision | Technical and Administrative Provisions (TAPs) |
| Other: Appendix only for Blending: List Lead Finance Institutions | To be added | N/A | N/A | N/A | N/A | N/A |
| Other: Appendix only for Budget Support (Disbursement Arrangements, Conditions and Performance Indicators) | N/A | N/A | N/A | To be added | N/A | N/A |