

AMAN
Transparency Palestine



Summary:
Strategic Plan 2022
Partners for Integrity

Preface:

Stamping out corruption is an urgent need to achieve sustainable development and strengthen the capacity of the Palestinian people for resilience, perseverance and resistance of the occupation

Corruption is an insidious plague that has a wide range of corrosive effects on societies. It undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life, and allows organized crime and other threats to human security to flourish. Fight against corruption is of paramount importance for Palestinian society. It immunizes the internal environment by mobilizing efforts to resist the occupation, promote national perseverance and solidarity, and enhance citizens' trust in national leaders and public officials, and improve willingness to sacrifice for national liberation. This evil phenomenon is found in all countries big and small, rich and poor, but it is in the developing world that its effects are most destructive. Corruption hurts the poor disproportionately by diverting funds intended for development, undermining a government's ability to provide basic services, feeding inequality and injustice, and discouraging foreign investment and aid.

On 1 January 2016, the 17 Sustainable Development Goals (SDGs) of the 2030 Agenda for Sustainable Development – adopted by world leaders in September 2015 – officially came into force. With these new Goals that universally apply to all, countries will mobilize efforts to end all forms of poverty, fight inequalities and tackle climate change, while ensuring that no one is left behind. Set to **promote Peace, Justice and Strong Institutions**, SDG 16 is tailored to promote peaceful and inclusive societies for sustainable development. It paves the way for the provision of access to justice for all and for building **effective, accountable institutions** at all levels.

SDG 16 requires that governments, civil society and communities work together to implement lasting solutions to reduce violence, deliver justice, combat corruption and ensure inclusive participation in decision making that impacts lives. Laws and policies must be enforced without any form of discrimination. Conflicts must be resolved through effective political and judicial systems. To achieve SDG 16, national and local institutions will be held to account and be ready to deliver basic services to households and communities equitably and without having to pay bribes, ultimately ensuring just, peaceful and inclusive societies, where no one is marginalized. SDG 16, **Peace, Justice and Strong Institutions**, identifies 12 targets for achievement. Of these, a number of targets set priorities for fight against corruption at an international level by 2030.

- Among the institutions most affected by corruption are the judiciary and police.
- Corruption, bribery, theft and tax evasion cost some US \$1.26 trillion for developing countries per year; this amount of money could be used to lift those who are living on less than \$1.25 a day above \$1.25 for at least six years
- The rule of law and development have a significant interrelation and are mutually reinforcing, making it essential for sustainable development at the national and international level.

Facts and Figures, SDG 16

The Palestinian government approved the *2017-2022 National Policy Agenda (NPA): Putting Citizens First* to create a plan that clearly does **put citizens first along the inevitable path to a free, independent and prosperous State of Palestine**. Involving all government bodies, civil society and private sector, the NPA aims to provide all Palestinians with an improved standard of living, better services accessible to all while providing concerted support to citizens. The Agenda draws on past achievements and extensive consultations with local and international partners across Palestine and beyond. It lays the foundation for three pillars of the future Palestinian state: **the Path to Independence; Government Reform; and Sustainable Development**.

Along the lines of these three pillars, the NPA 2017-2022 provides a set of policies and interventions in relation to combating corruption. Most of these are included in the framework of holding Israel to account; upholding democratic principles; government reform; citizen-centered government; effective government; responsive local government; effective, efficient public financial management; and strengthening accountability and transparency. The NPA sets a number of policy interventions to promote the

SDG 16 targets

Peace, Justice and Strong Institutions

- By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime
- Substantially reduce corruption and bribery in all their forms
- Develop effective, accountable and transparent institutions at all levels
- Ensure responsive, inclusive, participatory and representative decision-making at all levels
- Broaden and strengthen the participation of developing countries in the institutions of global governance
- Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements

values of integrity, systems of accountability and principles of transparency. Strengthening accountability and transparency will be accomplished through the following measures:

- Combat corruption in all its forms and implement the code of conduct for civil servants.
- Strengthen transparency in government, including the approval and implementation of access to information legislation.
- Strengthen the role of financial and administrative audit institutions.
- Strengthen results-based management and integrated planning and budgeting.
- Promote effective human resources management and development.
- Institutionalize gender mainstreaming in policymaking, planning and budgeting.

Developed by the Coalition for Accountability and Integrity (AMAN), the 2018 *National Integrity System (NIS) in Palestine Report* stresses the need to introduce substantial reforms to many sectors and public bodies responsible for public service provision or public financial management. These reforms should pave the way to create a NIS, which is capable of providing immunity against corruption and heightening the risk of corruption in any of this NIS pillars. Reforms need to cover legal, institutional and policy frameworks. Additionally, systems and mechanisms should be developed to regulate the working relationship between the main powers (legislative, executive and judicial branches of government). As approved by the Palestinian National Authority (PNA), oversight mechanisms should also be reinvigorated.

The NIS is distinctive of the strength of some pillars, including the Central Elections Commission (CEC), civil society, Palestinian Anti-Corruption Commission (PACC), State Audit and Administrative Control Bureau (SAACB), and Independent Commission for Human Rights (ICHR). On the other hand, law enforcement agencies, private sector, public sector, and the judiciary enjoyed a relative strength, thanks to their own resources and relative independence. However, these NIS pillars do not provide significant momentum to enhance the NIS. The performance of these pillars is debilitated by weaknesses of other pillars, mainly a debilitated role and inaction of the Palestinian Legislative Council (PLC), the Executive's failure to apply the principles of transparency, and poor media oversight. In addition to inadequate accountability of the Executive agencies, a nationwide, participatory plan for fight against corruption is lacking. A dysfunctional PLC results in an ineffective oversight function. Judicial control over the executive branch is also weak. Critical deficiencies indicate that the PLC and the Executive are the weak pillars of the NIS.

AMAN: Engaging continuously with our partners and committed to our values and approach to rooting out corruption

Vision and aspiration: A Palestinian society free of corruption.

Mission: Mobilize efforts to promote integrity and combat corruption, drawing on a lawful activity sanctioned by the Palestinian law, public support, and full membership of Transparency International.

AMAN's vision and mission are grounded in the Declaration of Independence of the State of Palestine, Palestinian Amended Basic Law, and United Nations Convention against Corruption (UNCAC). In accordance with the 2005 Anti-Corruption Law as amended, **AMAN defines corruption** as the “crimes which violate the duties of public service as well as the crimes which breach public trust as prescribed by the penal laws in force; the crimes resulting from money laundering as provided for by the Anti-Money Laundering Law; each act that leads to the prejudice of public funds; abuse of power in contravention of the law; acceptance of favoritism and nepotism in a manner that revokes a right and renders an injustice legitimate; illegal gain; and all the acts which are criminalized under Arab and international anti-corruption conventions, which the National Authority has ratified or acceded to.”

As noted in the preamble to the UNCAC, AMAN also believes that **fight against corruption is no longer a local matter**, but a **transnational phenomenon** that affects all societies and economies, making international cooperation to prevent and control it essential. AMAN is further convinced that **a comprehensive and multi-disciplinary approach is required to prevent and combat corruption effectively. In the context of an efficient NIS, anti-corruption efforts ensure reducing opportunities for corruption and increasing the resilience of public bodies, officials and staff against corruption. The NIS involves all state institutions (public sector) and civil society organizations (CSOs).**

“[States] must cooperate with one another, with the support and involvement of individuals and groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations, if their efforts in this area are to be effective.”

Preamble to the UNCAC

Since its inception, AMAN has been of the view that the elimination of corruption contributes to reducing poverty, **improving service provision** to disadvantaged areas and vulnerable groups, and investing in creating employment opportunities. In addition to **fair resource allocation**, eradication of corruption also helps enhance health, education, welfare service delivery for all,

consolidate **social cohesion**, and implement SDGs. This concerted effort promotes **unity, resilience and struggle of the Palestinian people** towards national liberation and the rule of law.

As a think tank, and in consistence with Article1 of the UNCAC, AMAN and its partners seek to provide sector-wide technical and advice to all stakeholders in systems of integrity and fight against corruption to achieve purposes of the UNCAC. In the context of its oversight role, AMAN monitors the current status of integrity and anti-corruption efforts, strengthens the role of CSOs and media outlets, and creates an enabling environment for local government units (LGUs) and public institutions, contributing to exposing corruption crimes and reducing the incidence of corruption. To do so, AMAN provides extensive monitoring, lobbying and advocacy. As part of its approach to serving as a Palestinian think tank at national, regional and international levels, AMAN produces knowledge and publishes studies on integrity and fight against corruption.

To challenge corrupt individuals, the lawful functions performed by AMAN and its partners are backed by Palestinian laws and by the legitimacy endowed by Palestinian society. AMAN is an active member of Transparency International (TI) and Arab Anti-Corruption and Integrity Network (ACINET). Since 2006, the Coalition has been a full member of TI.

AMAN seeks to **play its national role in mobilizing grassroots efforts to combat and dry up the sources of corruption**. To this avail, AMAN works in partnership with people, unions, media outlets, academic institutions, CSOs, representative bodies and grassroots organizations to contribute to and influence decision-making in connection with the prevention of corruption and creation of favorable conditions to realize the values of integrity, principles of transparency, and systems of accountability.

Values governing AMAN and its partners' functions

In its work, AMAN is committed to setting up a governance model of civil society functions, stressing compliance with a set of integral values in the operations delivered by relevant managers and staff. In its policies and procedures, as a role model for Palestinian society, AMAN adheres to maximum transparency and carries out operations in tandem with an effective monitoring and evaluation (ME) system. The Coalition is committed to a set of values and principles, including but not limited to:

Statement of purpose of the UNCAC

- (a) To promote and strengthen measures to prevent and combat corruption more efficiently and effectively;
- (b) To promote, facilitate and support international cooperation and technical assistance in the prevention of and fight against corruption, including in asset recovery;
- (c) To promote integrity, accountability and proper management of public affairs and public property.

Transparency: This means clearly defined internal regulations and procedures for both AMAN and its partners, including national and international institutions, individuals, experts, and donors. For us, transparency also reflects publicly accessible procedures, objectives and goals in our work, as well as public disclosure of applicable policies, particularly financial, administrative, employment and contracting policies. Additionally, transparency means **publication** of all administrative, financial, performance and program reports. Any relevant information are also **made publicly available**, without prejudice to the privacy of staff or members.

Accountability: AMAN's Board of Directors and Executive Director are committed to carry out powers and responsibilities as authorized by AMAN's General Assembly. To this avail, AMAN's Board and Executive Director develop anti-corruption policies, programs and plans and **submit information and explanations** to General Assembly members, member institutions, and national and international partner organizations. Access to information is provided to all government bodies, research centers, and persons with interest in integrity and fight against corruption. AMAN also releases periodic reports on the effectiveness and efficiency of its programs and policies.

Integrity: AMAN's Board always ensures that members and staff abide by a **code of professional conduct that is grounded in honesty, trustworthiness and sincerity**, privileging the principle of fair, equal and non-discriminatory treatment of all. At all times, AMAN members and staff behave responsibly and objectively in institutional and fund management. AMAN always ensures there no conflict of interest affects the functions of AMAN staff and Board.

Solidarity: AMAN works towards supporting the just claims of unions, interest groups, coalitions and networks at national, Arab and international levels.

Courage: Together with its partners and the coalitions led or represented by AMAN, AMAN will propose cases of suspicions of corruption or any gaps in the integrity and anti-corruption system in all sectors. AMAN will do so **resolutely, clearly**, and without favor or compromise with officials in the institutions concerned.

Justice: In its operations, AMAN will stand by the causes of vulnerable groups and areas in society.

Democracy: AMAN is committed to periodic elections, allowing all managements to play their assigned roles. AMAN also complies with the culture of respect for difference, ensuring that disagreements in debate and discussion between members and partners are positive. AMAN renounces discrimination based on the place of residence, gender, religion, age, or belief. The Coalition is further committed to ensuring the broadest public participation in policymaking and planning processes.

AMAN: TI-accredited Palestinian organization – learning, building and mobilization towards continuity and change

AMAN was established in 2000 thanks to an initiative by a number of Palestinian CSOs working in the fields of democracy, human rights, and good governance. Enjoying credibility and support from Palestinian society, these organizations focused part of their efforts on launching a national program to combat corruption and bolster the values of integrity, principles of transparency and systems of accountability in society from across the spectrum. These civil society groups also sought to build a NIS.¹

AMAN is governed by a General Assembly, including 25 representative members of constituent CSOs, namely, the Palestinian Initiative for the Promotion of Global Dialogue and Democracy (MIFTAH), Palestinian Institute for the Study of Democracy – (Muwatin), Faisal Husseini Foundation, Palestinian Trade Center (Pal-Trade), and Al Mezan Centre for Human Rights. Membership of AMAN’s General Assembly also includes four good governance and anti-corruption activists. AMAN is managed by a diversified Board of Directors with proven experience in the administration and management of CSOs, investment, research, and international relations. AMAN’s Board includes 11 members (five females and six males). The General Assembly is supported by an internal control committee, comprising two General Assembly members. The committee monitors and supervises internal audit reports before submission to the Board.

AMAN employs a total of 30 (18 female and 12 male) **staff** members. While five are based in the AMAN Gaza Office, 25 staff members are stationed in the Ramallah Office. AMAN staff members are distributed to the Operations Department, Financial and Administrative Affairs Department, Gaza Regional Office, and a number of units and support positions. AMAN staff are also supported by a group of academics, researchers, trainers, and specialists in the development of integrity and anti-corruption systems. According to AMAN estimates, more than 40 multidisciplinary experts and specialists have been trained and engaged in studies, research papers, training activities and consultancies in connection with the NIS and fight against corruption over the past years. A number of AMAN staff and **partner academics, researchers and trainers** are also involved in activities and interventions implemented across Arab countries.

In the context of concerting anti-corruption efforts and promoting civil society contribution to the national pursuit of consolidating integrity and fight against corruption, **AMAN has taken the lead to launch initiatives and create coalitions with a view to maximizing the efforts of control over, and accountability for, the management of public affairs and public property.** The Civil

¹ AMAN’s certificate of registration was issued by the Palestinian Ministry of Interior in 2004. Under the name of the *Union of the Coalition for Accountability and Integrity (AMAN)*, AMAN was registered as a Palestinian non-profit community-based association.

Society Team for Enhancing Public Budget Transparency is probably the most notable of all AMAN's initiatives. In addition to economists, membership on the Team includes more than 24 CSOs working in the fields of human rights, rule of law, and good governance. Another initiative of AMAN, the **Civil Forum for Promoting Good Governance in the Security Sector**, aims at engaging CSOs in community oversight and accountability for operations of the security sector. AMAN took the initiative to establish this forum in 2014.

AMAN has further managed to build some partnerships with CSOs within the framework of **incorporating integrity and anti-corruption concepts and tools into CSO strategies and programs of action**. These partnerships are tailor made to motivate and empower CSOs to raise public awareness in targeted sectors. In this context, AMAN provides a set of capacity building activities and technical support to CSOs wishing to incorporate anti-corruption activities and tools into their programs and interventions as well as to strengthen the NIS.

In 2006, AMAN was accredited as a full chapter of TI. Accreditation was subsequently renewed in 2010, 2013, and 2016. Under supervision of the TI Board, the renewal process was an outcome of comprehensive reviews and evaluations of the standards and indicators of good governance, integrity, transparency and accountability within AMAN. **The Coalition has also made, and continues to make, significant contributions to establish and achieve the TI mission and strategy by more active participation in the TI activities as well as in regional and international events.**

AMAN plays a major role in sharing experiences and providing capacity building to Arab and national TI chapters. Along this vein, in the previous strategy period, AMAN implemented a regional program to establish and train civil society coalitions for control over public budget management in Jordan, Tunisia, Morocco and Lebanon. AMAN is an active TI chapter, contributing effectively to developing anti-corruption strategies at Arab and international levels. AMAN also **disseminates and localizes Arab and international knowhow** through active membership on regional and international networks, including the Arab Region Parliamentarians against Corruption, ACINET, and UNCAC Coalition. In addition, AMAN has built a network of relations and partnerships with counterpart international anti-corruption organizations. In this context, the Coalition has contributed to exploring the local status of integrity in seven Libyan municipalities and provided capacity building to relevant staff with a view to promoting the values of integrity and fight against corruption.

To fund its program cycles, AMAN relies on two main sources. Firstly, the **Core Program partners, namely, the governments of Norway, the Netherlands and Luxemburg**, have served as the main source of financial support to AMAN since 2004. These donors have played an effective role in the organizational growth and strategic development scored by AMAN over the years. Secondly, making up 25 percent of AMAN's finances, support projects are funded by different donors, including Oxfam, European Union, TI, United Nations Development Program (UNDP), and Department for International Development (DFID).

Over the course of its career, AMAN has managed to serve as a **Palestinian think tank with a specific focus on the promotion of integrity and fight against corruption**. AMAN has made core contributions to placing integrity and anti-corruption themes on the Palestinian agenda and as a priority of national institutions. The Coalition has contributed to institutionalizing the anti-corruption effort at national and government levels. In addition to its efforts to improve the Law on Illegal Gains, AMAN has pressed ahead with the establishment of the PACC and signing of the UNCAC.

AMAN has **earned greater credibility and trust** at local, Arab and international levels. It is now **a main authority that produces and provides access to knowledge about the current status of corruption both locally and regionally**. The Coalition compiles focused studies and reports, examining the status of corruption in different Palestinian sectors. These serve as an authoritative reference to Palestinian decision-makers, providing recommendations tailored to strengthen anti-corruption and public financial management policies, processes and measures. Additionally, AMAN has made extensive efforts to offer legal support and advice to victims of corruption, raise public awareness of the forms of corruption, and encourage citizens to report corrupt practices, which they eye-witness or are victims of, to the Coalition's Advocacy and Community Accountability Unit.

Since it was established, AMAN has implemented five program cycles, all informed by a strategic vision of promoting the NIS and combatting corruption in Palestinian society. Spanning the period 2000-2016, AMAN's previous four strategies placed an emphasis on disseminating the concepts of integrity, transparency and accountability in Palestinian society, providing sensitization of corruption risks, and publicizing corruption prevention methods and tools across Palestinian sectors, including public sector, LGUs, private sector, civil society, media, etc. In late 2016, AMAN conducted an important strategic review of the Coalition's performance in light of the previous strategy. Including an analysis of changes in the external work environment, the review

Courses of change in AMAN's Strategy 2017-2020

1. Citizens are more aware of integrity, fight against corruption, and accountability for public performance
2. In their strategies, CSOs work towards mainstreaming integrity and fight against corruption, and are qualified to engage in the oversight of public performance.
3. The Palestinian media is empowered to control public performance and engage in the anti-corruption efforts.
4. Institutional and policy challenges and gaps in the existing integrity and anti-corruption system are placed on the agenda of decision-makers and lobbying groups.
5. Stakeholders adopt policies and measures to support fight against corruption and being an end to impunity.
6. Support is provided to LGUs to diagnose their work environment in connection with the values of integrity, principles of transparency, systems of accountability and fight against corruption.
7. Local community groups are informed and aware of the risks of corruption and the importance of control over public funds and performance within LGUs. These groups are also empowered to implement advocacy campaigns to improve service provision.

was used a groundwork for developing AMAN's fifth Strategy 2017-2020. Titled *Hand in Hand, We Can Bring an End to Impunity*, the strategy introduced a shift of focus. Thanks to efforts made by AMAN over previous years, the concepts of transparency and integrity were firmly established on the government agenda. Moving beyond an awareness raising activity, AMAN moved on to play a watchdog role, providing control over compliance with, and effective implementation of, these values and concepts as well as of relevant legal frameworks. Hence, AMAN transitioned from preventive interventions to monitoring, advocacy and lobbying, and engagement of citizens to lobby for a change in public administration with a view to ensuring transparency of public resources and budgeting process. In this context, AMAN's fifth Strategy 2017-2020 had its focus on increasing the effectiveness of its operations to promote integrity and immunity of the local government sector against corruption. To this end, AMAN has released and distributed studies on the local integrity system (LIS) to a number of municipalities, setting a roadmap for consolidating integral, transparent and accountable functions. These are also designed to empower local communities to exercise community accountability for LGU performance.

Description (context analysis)

Corrupt management of public resources undermines the government's ability to deliver public services, including health, education and care. These services are crucial to fulfil economic, social and cultural rights. Widespread corruption gives rise to discriminatory access to public services. Using various techniques, such as bribery, influential people can make government bodies serve their personal interests.

Corruption encourages citizens to use unlawful techniques to attain rights. Difficult or obstructed access to, and lack of readily available, health, education or other fundamental human rights force the public to look for illegal alternatives. Some people might, therefore, be obliged to pay bribes, engage in favoritism, or use other techniques. Corruption also furnishes an opportunity to exchange interests between people in powerful positions. It undermines commitment to human rights, facilitates access for influential individuals rather than for marginalized groups, and helps interest groups to extend influence over resources without consideration of the rights of other social groups.² As a result, marginalized groups, particularly persons with disabilities, the elderly, women

² Dana, Tariq. (2015). *Corruption in Palestine: A Self-Enforcing System*, <https://al-shabaka.org/briefs/corruption-in-palestine/>

and children, are deprived of their rights. Corruption undermines trust in any reform processes, fulfilment of human rights, or combating of corruption. Depriving marginalized groups also exacerbates the negative impacts of human rights abuses and corruption.³

Officials can use anti-corruption tools to persecute rivals, in grave violation of civil and political rights. In this context, corruption charges and anti-corruption mechanisms are deployed to settle political scores and take revenge against political opponents.

In Palestine, partial efforts and scattered efforts were exerted to fortify the environment against corruption. In general, the NPA 2017-2022 places a special focus on strengthening Palestinian citizens' perseverance. To this end, Pillar 2 of the NPA envisages the improvement of quality public service delivery by a citizen-centered government, enhancement of services provided to citizens, strengthening of accountability and transparency, and effective, efficient public financial management. Accordingly, many sector and cross-cutting strategies have been in place to scale up public service provision.

Other efforts include improvement in commitment to integrity values, principles of transparency and systems of accountability in areas of public affairs management, there were improvements at the level of public employment as: the government's approval of the Strategic Plan for Civil Service which aimed at rationalization of the salary and wage bill, approval of the code of conduct for the security services; approval of the Strategic Plan for the Management of Public Funds, Improvements at the level of accountability include: in the West Bank, the State Audit and Administrative Control Bureau (SAACB) continued to carry out its monitoring role effectively to also include performance evaluation and supervision of respect for the law, in general. The Bureau published its annual reports exposing dozens of financial and legal administrative transgressions and violations.

³ Progress Report of the Human Rights Council Advisory Committee on the issue of the negative impact of corruption on the enjoyment of human rights, 2014.

Despite of these improvements, many challenges regarding combating corruption still exists such as the failure to develop a cross-sectoral national anti-corruption plan 2015-2018 which indicates the lack of government's will to combat corruption; absence of a specific system or law for the protection of whistleblowers; non-enforcement of the Anti-Corruption Law in the GS; lack of conviction in the independence of the (ACC) and its seriousness in holding senior officials accountable; absence of a parliament to follow up on the SAACB reports and its recommendations; lack of seriousness among institutions to implement the SAACB recommendations. In addition, difficulty in accessing information and fear of media professionals from legal prosecution; also lack of professional and legal protection to conduct investigative reports.

All of these challenges accompanied with a decline in the openness and transparency of the government was noticed. This was exemplified by the government's persistence to renounce its promises to approve the "Access to Information Law", as stipulated in the National Policy Agenda 2017-2022. The government also repeatedly did not adhere to the principles of transparency in granting concessions or ensure the prevention of monopoly, which raises questions on the common interests between politicians and big businessmen in the private sector. The government also was not been transparent in regard to agreements signed on behalf of the Palestinian people concerning the provision of vital services such as electricity, gas, water, communications and the Red Sea-Dead Sea agreement. Lastly, some public institutions did not publish their annual reports as the cases of the SAACB in the GS.

All of these challenges have increased people's perception of rampant corruption as shown by results of the 8th Palestinian Integrity Index, 2018; opinion polls conducted by AMAN, the JMCC, and the Palestinian Center for Research and Survey Studies where 64% of respondents believe that the level of corruption in the PA institutions is "massive" versus 57% in 2017. And 83% of them believe that anti-corruption efforts are still weak and insufficient. Reasons for these results were: citizens' lack of seriousness in monitoring the government and officials, and lack of seriousness in holding corrupt officials accountable. These are indicators of the lack of confidence people hold for governance, and in their pessimistic view of the effectiveness of the anti-corruption efforts exerted.

National Priorities for combating corruption and enhancing National Integrity System:

2.1 National Integrity System Assessment 2018 (NIS 2018)

The key objectives of the National Integrity System assessment are to generate an improved understanding of the strengths and weaknesses of Palestine's National Integrity System (NIS) within the anti-corruption community and beyond momentum among key anti-corruption stakeholders in Palestine for addressing priority areas in the National Integrity System. It aims at evaluating the effectiveness of Palestine's institutions in preventing and fighting corruption and in fostering transparency and integrity. In addition, it seeks to promote the assessment process as a springboard for action among the government and anti-corruption community in terms of policy reform, evidence-based advocacy or further in-depth evaluations of specific governance issues. This assessment should serve as a basis for key stakeholders in Palestine to advocate for sustainable and effective reform.

The 2018 National Integrity System (NIS) in Palestine study stresses the need to introduce substantial reforms to many sectors and public bodies responsible for public service provision or public financial management. These reforms should pave the way to create a NIS, which is capable of providing immunity against corruption and heightening the risk of corruption in any of this NIS pillars. Reforms need to cover legal, institutional and policy frameworks. Additionally, systems and mechanisms should be developed to regulate the working relationship between the main powers (legislative, executive and judicial branches of government). As approved by the Palestinian National Authority (PNA), oversight mechanisms should also be reinvigorated.

2.2 Main recommendations and priorities according to the NIS assessment 2018:

1. Revive the PLC as the first institution responsible for overseeing and holding the executive to account.
2. Ending the political divide between the West Bank and the Gaza Strip and unifying the work of Palestinian institutions is of particular importance in strengthening the national integrity system and limiting the possibility of evading public accountability through elections.
3. Enhancing the independence of the Palestinian judiciary, developing the rules of the mechanisms for selecting the head of the Supreme Judicial Council, stopping the

interference in the work of the judiciary, and respecting the judiciary decisions and implementing them by all parties.

4. Continue to work on building a value system that rejects mediation and favoritism and raises citizens' awareness of preserving public money.
5. A comprehensive national anti-corruption plan should be developed in line with the adopted process in developing the National Strategies.
6. All Palestinian legislation should be harmonized and adapted in accordance with the United Nations Convention against Corruption, whether in criminalizing all manifestations of corruption or tightening penalties for such crimes and issuing legislation and regulations to avoid conflicts of interest and disclosure mechanisms.
7. The right to information law should be ratified as soon as possible.
8. Monitoring the performance of the private sector and its relationship with public sector should be enhanced with focus on preventing conflict of interest and monitoring ITA in public services provision by the private sector.
9. As fighting corruption is crosscutting issue, all the national strategies should be developed to include enhancing ITA and combating corruption in the targeted sectors (such education, health, transportation, security... etc)
10. Issuing instructions regarding the disclosure of gifts and hospitality to employees.
11. Codes of conduct for members of the Council of Ministers and members of the Legislative Council should be developed and monitored.
12. Establishing a committee for the quality of governance in the public sector, consisting of credible public figures and knowledgeable in governance affairs, to consider appointments of candidates for senior positions in the public sector.
13. The annual and special reports of the State Audit and Administrative Bureau should be followed up effectively, which contain remarks and recommendations to correct mistakes, stop cases of waste of public funds, and promote the establishment of the national integrity system.
14. The board members of civil society organizations should strengthen the role of civil society organizations in supporting the values of integrity, accountability systems and transparency principles in Palestinian society, and help grassroots institutions to play a direct role in creating awareness of the importance of these values and principles and the risks posed by

corruption manifestations. In addition to the need to more engagement of CSOs in monitoring the performance of the public sector in managing the public fund.

15. The media should be enabled to have free access to information on corruption cases in order to fulfil its role in the fight against corruption and encourage media organizations and their editors to conduct investigative reports to uncover corruption cases.
16. Supporting local government units with experience, tools and systems to enhance integrity protecting them against all forms of corruption since they are the closest to the public as they are the day-to-day providers of services and serve diverse local requirements.

1. Theory of Change

AMAN assumes that eradicating all forms of minor and major corruption requires, first and foremost, a Palestinian society that is capable of combatting corruption. To this end, we all must work towards lobbying decision-makers in order to build a NIS jointly with all social activists, interest groups, CSOs, political parties, unions, researchers, and public opinion makers. Within the framework of a national programme to mobilize efforts towards promoting integrity and fight against corruption, this will culminate in an objective, workable and multilateral national strategy and plan of action. With its own budgeted line item and ME mechanism, the anti-corruption strategy and plan of action will be designed to immunize public institutions against corruption and rejuvenate the role of oversight bodies.

AMAN assumes that rooting out corruption requires that all public institutions adopt policies and measures to ensure immunity against all forms of corruption. These include line ministries, non-ministerial government bodies, LGUs, and public shareholding companies. Also involved is any regulatory body entrusted with the responsibility for public service provision, including health, education, water and energy supply, telecommunications, social protection, security, land administration, banking, financing, transportation, solid waste disposal, wastewater treatment, and labor.

AMAN assumes that accountability, deterrent penalties, prevention of impunity and asset recovery from corrupt individuals would offer the best deterrence against persons who contemplate any form of corruption. To this avail, oversight bodies and the PACC need to be effective, independent, and willing to expose and put corrupt people on trial. These will also contribute to immunizing public institutions against all forms of corruption.

AMAN assumes that community-based action requires effective CSO participation across relevant lines of activity. By setting an example, CSOs will also actively contribute to establishing a NIS, raise awareness

of target audiences, and adopt Programs to promote social accountability. Community-based action further needs free, independent, effective and efficient media institutions for community outreach and public opinion making. Universities and schools will also offer noncurricular activities to lay out the forms, causes and impact of corruption on society at large.

AMAN assumes that immunizing public institutions needs multiple efforts by state organs, government bodies, civil society, and local communities. Complementarity and a consensus-based process lay the foundation for the desired change: public institutions are free of any form of corruption. To materialize accountability, community-based action, effective oversight bodies and efficient media agencies will essentially ensure that public institutions adopt and fully implement policies in support of the principles of transparency, values of integrity, and systems of accountability. In addition to material resources, institutional immunization needs sufficient and trained staff to be deployed at internal control units in line with clearly defined oversight policies that apply to all.

AMAN assumes that effective and independent oversight and anti-corruption agencies also need multilateral efforts, consensus-based priorities for action, and a political will for the desired change. To this end, a legislative framework and preventive process will be in place to prevent impunity of all corrupt individuals wherever they are. This effort requires recruitment of trained, motivated and professional human resources, who function independently of partisan, regional and familial frameworks. It also necessitates that regional and international agreements be concluded to support prevention of impunity and asset recovery.

AMAN assumes that political will can be promoted once the Palestinian leadership and anti-corruption actors are fully informed of the current context of widespread corruption throughout Palestinian society and of its impact on community cohesion, public trust in state institutions, national allegiance, and community welfare. The Palestinian leadership will also be made aware of the existing gaps in the integrity and anti-corruption system across different sectors, including by means of relevant factual and evidence-based reports and studies. AMAN and its partners also assume that that public opinion makers, including academics, politicians, researchers, members of the Palestinian National Council, artists and some Palestinian leaders, will contribute to boosting political will in order to achieve change at all levels.

AMAN assumes that multilateral, consensus-based action will contribute to alleviating challenges to the desired change. In particular, predicaments are posed by the ongoing occupation, lack of Palestinian control over border crossings, and persistent internal Palestinian political divide. As a consequence of inactive PLC, some oversight bodies and the PACC have been unable to play their assigned role in the Gaza Strip. We further assume that the new government openness to civil society will contribute to mitigating the impact

of inaccessible information and public records. Currently, access to information is denied by some line ministries and government bodies allegedly for security concerns.

2. Linkage of AMAN's strategy 2020 objectives, results and the aforementioned priorities and how they will contribute towards the desired change in combating corruption:

Based on the above-mentioned priorities and strategies, AMAN identified the following Strategic Objectives and Related results:

Overall goal: A Palestinian society that is capable of combating corruption.

4.1 Strategic Objectives for 2020-2022

1. Promote community-based action in support of anti-corruption efforts and build the NIS
2. Promote the values of integrity, principles of transparency, systems of accountability and fight against corruption in public administration, public financial management, and service provision to the Palestinian public.
3. Consolidate efforts to expose corruption and corrupt individuals and prevent impunity by justice sector actors and law enforcement agencies.
4. Develop the institutional and organizational performance of Aman Coalition to fulfil its mission, vision and national, international and Arab partnerships, and to respond efficiently and effectively to emerging priorities

Strategic Objective 1: “Promote community-based action in support of anti-corruption efforts and build the NIS”.

AMAN seeks to play its national role in mobilizing grassroots efforts to combat and dry up the sources of corruption. To this avail, AMAN works in partnership with people, unions, media outlets, academic institutions, CSOs, representative bodies and grassroots organizations to contribute to and influence decision-making in connection with the prevention of corruption and creation of favorable conditions to realize the values of integrity, principles of transparency, and systems of accountability.

Most of the CSOs is not recognizing the negative impact of corruption in the quality of life and services to their beneficiaries of targeted groups and they lack the motivation and the will to be engaged in the fight against corruption and to confront with the government. This weakens the national efforts and increase the burden on other specialized in this field like AMAN. and so, this impedes any progress in anti-corruption and consequently impedes the achievement of the SDGs. So, institutionalization the process of engaging civil society organizations in anti-corruption is a concrete step in narrowing the circle of corruption.

Both directly and indirectly, corruption affects all sectors and groups targeted by CSOs, including the right to education and health. It also impacts the roles of the youth, the media, people with disabilities, farmers, women, among others. However, within its line of activity, every CSO can contribute to eliminating corruption by incorporating tools of integrity into its respective Programs. Accordingly, CSOs can monitor the integrity and transparency of public sector performance in relevant areas of operation. CSOs can also promote the culture of community accountability and raise awareness of target groups about the effects of corruption, whistleblowing, and community accountability for these groups to stand out for their rights.

Moreover, through this strategy, Palestinians citizens as an end user and their quality of life will be positively affected as engaging people and community in the fight against corruption towards and better services will be enhanced, and it would scale up the participation of the targeted groups in anti-corruption and will enhance the social accountability culture. On the other hand, and at the level of the work of the civil society organization, it will enhance CSOs capacity in overseeing the management of public money and fund and the violation of rights of their targeted group. It will more contribute in enhancing governance in the internal environment of the CSOs (Which will lead at the end to enhancement of citizens' trust in those CSOs and will improve the way of managing the public money that is granted to them.

Enhancing the culture of whistle blowing will increase the citizens participation in protecting public funds from waste. This requires enhancing citizens' awareness about corruption and integrity system and provide them with legal advice and support in light of lack of whistle-blowing protection law.

AMAN during the previous phase was able to achieve a great progress in media engagement in the fight against corruption through the preparation of tens of investigative reports. AMAN will build on this achievement and build new partnerships with media outlets to more institutionalize these efforts within the media institutions.

This objective will contribute towards achieving the Palestinian NIS assessment 4, 14 and 15 priorities. The implementation of the new strategy will contribute in building a responsible social movement that promotes integrity and combating corruption in the Palestinian society through the following means:

Approach

1. **Raise public awareness and interest** in forms, causes and impact of corruption on citizens' lives and future generations. To this end, a variety of campaigns will be organized by AMAN and partner CSOs or in cooperation with media outlets and educational institutions.
2. **Coordinate with and support relevant youth, media, student and civil society groups** to raise community awareness and improve community accountability.
3. **Host or take part in community coalitions** to exert influence on decision-makers and adopt relevant recommendations submitted by AMAN and its partners.
4. **Incorporate anti-corruption activity into CSO operations**, particularly in targeted sectors and priority areas.
5. **Develop educational materials** to enhance citizens' awareness of their rights, causes and impact of corruption, and motivation to report corrupt practices.

Strategic Objective 2: Promote the values of integrity, principles of transparency, systems of accountability and fight against corruption in public administration, public financial management, and service provision to the Palestinian public.

One of the main lessons learnt from previous strategy that AMAN was credited for using and relying on applied research in data collection and analysis. The information on corruption in Palestine was presented in an empowering approach to create an enabling environment for fighting corruption.

Since its inception, AMAN has been of the view that the elimination of corruption contributes to reducing poverty, improving service provision to disadvantaged areas and vulnerable groups, and investing in creating employment opportunities. In addition to fair resource allocation, eradication of corruption also helps enhance health, education, welfare service delivery for all, consolidate social cohesion, and implement SDGs.

In general, the NPA 2017-2022 places a special focus on strengthening Palestinian citizens' perseverance. To this end, Pillar 2 of the NPA envisages the improvement of quality public service delivery by a citizen-centered government, enhancement of services provided to citizens, strengthening of accountability and transparency, and effective, efficient public financial management.

Through this strategic objective, AMAN and its partners will focus towards adopting the rules, principles and values dictated by the Code of Conduct and Ethics for Public Service. Furthermore, AMAN will enhance its watchdog role over public-private sector relations, private corporations that provide public services to citizens, including electricity, water supply, telecommunications, transportation, mainly by profitmaking, the private sector needs to apply corporate governance norms and contribute to combating corruption by means of corporate social responsibility.

In addition to studies on the LIS, cases and complaints filed to oversight bodies and community organizations demonstrate that the local government sector continues to challenge the anti-corruption effort. This is further confirmed by AMAN's reports on the Local Government Transparency Index. This reporting process has covered dozens of LGUs across the West Bank and Gaza Strip over the past three years. From an organizational perspective, LGUs are largely uninformed of the integrity and anti-corruption system, particularly best practices in administrative, financial and internal control aspects.

This objective will contribute towards achieving the Palestinian NIS assessment 8, 9, 10 and 16 priorities through the following means:

Approach

1. Provide support and technical assistance to **diagnose the work environment of public institutions, LGUs and business sector**, including the current status of the integrity and anti-corruption system in respective operations.

2. Provide **support to local and national initiatives and coalitions which work towards holding the central government, LGUs and CSOs to account** for service delivery, regulatory activity, implementation of strategies, and transparent budgets and procurement processes.
3. Monitor the transparency of, and prevent squandering or encroaching on, the public budget.
4. Provide periodic **monitoring of the integrity and anti-corruption system at the national level** and in specific sectors, devise proposed solutions, and offer policy advice.

Strategic Objective 3: Consolidate efforts to expose corruption and corrupt individuals and prevent impunity by justice sector actors and law enforcement agencies

One of the major obstacles facing reform in the OPT has been the lack of information about the dynamics and real magnitude of corruption within various sectors in the Palestinian society. In addition to that and based on the assumption that enhancing the civil societies' watchdog capability depends on sufficient information, one of the main specific objectives of this phase is to continue the provision of improved, timely and objective flow of information about public issues to all stakeholders. In addition to developing integrity index and annual corruption report, AMAN will develop special corruption and integrity indexes targeting the judicial and the security sector. It is true that a lot of progress has been made in this regard, but work is still needed to provide continuous and updated information, based on systematic approach.

This component will mainly aim at raising the capacity and political will of the public, private and NGO institutions in the OPT in strategizing and devising proper implementation mechanisms for incorporating transparency and accountability in their institutional entity, administrative and financial systems and regulations. Special attention will be granted to achieving goal 16 of the SDGs 2030.

AMAN will focus its intervention on the government and council of ministers to increase their will to adopt AMANs reports' recommendations. AMAN will implement an advocacy campaign in which various strategies and tools will be used. On the other hand, AMAN will also maintain

its approach of engaging representatives of all sectors engaged in its activities particularly public hearings and conferences.

Networking is one of the strategies that AMAN adopts to develop its own capacity and to engage national and local organizations in the fight against corruption. AMAN will continue working with local organization to actively participate in AMAN's advocacy interventions.

This objective will contribute towards achieving the Palestinian NIS assessment 3-7, 9, and 13 priorities through the following means:

Approach

1. Scale up the production of knowledge of political integrity indicators.
2. Support and host interventions by effective national coalitions to monitor the efficiency and independence of justice sector and oversight bodies.
3. Support national efforts to implement SDG 16 (Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels).

Strategic Objective 4: Develop the institutional and organizational performance of Aman Coalition to fulfil its mission, vision and national, international and Arab partnerships, and to respond efficiently and effectively to emerging priorities

Approach

- Implement AMAN's Financial Sources Recruitment Strategy.
- Reinvigorate the capacity building program for AMAN staff.
- Sign long-term agreements with national experts to produce and disseminate relevant information.

Palestinian society has seen significant variables due to the absence of a credible political horizon for peace, disempowerment of state institutions, and ongoing internal Palestinian political divide. Escalating Israeli policies also aim at debilitating and subjugating the PNA and its institutions. These developments require substantial preparedness and program dynamism in order to cope with and respond to new priorities, dictated by variables in the integrity and anti-corruption system. This is all the more necessary to maintain and build on previous achievements in various courses of change. In pursuit of our strategic objectives, we should not be led off course by new developments, which potentially arise from major variables in our work environment. To this end, through this course of action, we will provide needed support to implement activities and projects

required by the said variables. In addition to consolidating our program objectives, we will respond to our partners' developing needs in order to promote integrity and fight against corruption in areas, which we cannot currently predict. Our work on this line of activity will not only improve our adaptive management capacity to ensure effective and efficient strategy implementation, but it will also significantly consolidate a positive community vision of our work. We believe that this will promote our capacity for greater mobilization to combat corruption, build partnerships with local and international institutions, and strengthen relevant community empowerment Programs. In this course of action, we will work towards:

1. Developing regulatory, administrative and financial structures and policies to promote AMAN's capacity to effectively and efficiently cope with and respond to new priorities as well as national, regional and international obligations.
2. Providing continuous publicity of AMAN's readiness to support individual and community initiatives to immunize the integrity and anti-corruption system at local and national levels.
3. Supporting the initiatives taken by AMAN and its local and international partners to respond to new priorities, which bear influence on integrity and anti-corruption efforts, particularly in areas that are not completely aligned with our lines of activity within the other three courses of change.

Partners:

Civil society team for enhancing public budget transparency (CSTPBT)

The team includes 38 Palestinian civil society organizations which are active in various vital sectors such as health, education and social development. It was established in 2010 as a result of an initiative by AMAN to enhance transparency and improve the management of public funds and budget. The team plays a key role in the oversight of the public budget and the enforcement of government accountability on its spending. It also provides solutions and recommendations to the Palestinian government to adopt policies that aim at rationalizing public expenditure.

The Civil Society Platform for Enhancing Good Governance in the Security Sector

The platform (13 NGOs) was established through an AMAN initiative in 2014 to activate the civil surveillance over the performance of the security institution in providing services to the public or in the management of public funds with integrity, transparency and neutrality. AMAN is also working on the development of mechanisms of communication and openness between civil society and the security institution, in addition to encouraging community accountability over their performance by citizens and civil society organizations and the media

This platform also carries out several activities and monitoring initiatives, namely the publication of an annual report on the integrity and anti-corruption system in the work of the security institution, and the announcement of its results at an annual conference. Based on these results, the platform produces further specialized working papers and reports and implements advocacy and lobbying campaigns.

Coalition: Al-Quds Declaration against Corruption

A coalition of 32 local NGO working on continues national advocacy in order to achieve advocate for adopting an anti-corruption national plan which is an entry point for collective action by all stakeholders against corruption. This coalition succeeded in 2019 in forcing PACC to develop the national anti-corruption plan with the participation of all sectors representatives. The coalition will cooperate with AMAN in monitoring the implementation of the national anti-corruption plan 2020-2022.

Coalition for civil control over the legislation

This coalition (AMAN is active member of it) is a coordinating body comprising a number of CSOs in order to monitor the legislative process in the absence of the PLC. The coalition is active in reviewing draft laws and regulations and in suggesting modification on current legislations. The coalition will cooperate with AMAN in advocating and reviewing anti-corruption laws and regulations.

The Civil Coalition for the Reform and Protection of the Judiciary

This coalition (AMAN is active member of it) is a coordinating body comprising a number of CSOs working on the fields of justice, human rights, judiciary...etc, advocating for judiciary reform. This coalition will cooperate with AMAN in its intervention to enhance ITA in the work of the judiciary and its independency.

The national team for achieving G16

Is a national group representing public, CS and private sectors working on developing the national plans to achieve goal 16 of the SDGs 2030. This team (AMAN is leading the anti-corruption component in its plans) will cooperate with AMAN in adapting G16 indicators and to integrate its indicators within the national anti-corruption indicators.

NGO against corruption Network

AMAN will continue working with its partners (a number of NGOs with focus on youth and women CBOs were empowered in anti-corruption and integrity in the last 3 years) in order to:

1. Implementing awareness raising and social accountability activities targeting their sectors and beneficiaries (health, youth, women, education...).
2. Implementing joint national advocacy campaigns

The civil society coalition for monitoring elections financing campaigns:

This coalition will cooperate with AMAN in its advocacy and monitoring interventions related to elections financing campaigns during (include 30-40 NGOs).

Target groups and beneficiaries:

1. Public institutions:

Services Ministries (Education, Health, Transportation, Interior, Communication, Social development)

AMAN will focus on monitoring ITA in service provision by these ministries

Ministry of Finance:

Oversight of transparency and integrity of the Public budget through the civil society team for enhancing public transparency

Non-ministerial Institutions

Monitoring ITA in their work and any abuse of the administrative and financial independency in these institutions

Public oversight institutions (PACC, SAAB, General Attorney)

Monitoring the efficiency and independency

Local Government Units (LGUs)

1. Follow up on their commitment in implementing the recommendations of the Local Integrity System (LIS) Studies
2. Building their Capacity on ITA standards

2. Media

Building their capacity in investigative reporting

2. Supporting media social accountability initiatives

3. University and School Students:

1. Developing anti-corruption curriculums (in investigative reporting, anti-corruption legal advice...etc)
2. Raising the student's awareness on ITA and combating corruption
3. developing students' research on anti-corruption
4. Implementing social accountability initiatives

4. The judiciary:

1. Monitoring ITA and independency in the work of judiciary
2. Monitoring corruption cases in the courts

5. Whistle-blowers and corruption victims through ALAC

1. Raising awareness
2. Legal advice for whistleblowers and victims

6. NGOs:

1. Capacity building on good governance in the work on NGOs
2. Technical support to integrate ITA in their strategies and programs
3. Technical and Financial support to implement social accountability initiatives.

7. AMAN as a house of expertise

1. Enhancing the research and development unit, Strategic planning efforts, the partnership approach and networking, Improving Internal audit and supporting MEL and RBM

8. Palestinian citizens in large:

1. Raising awareness on ITA and anti-corruption
2. Encouraging social accountability culture (focus on youth and women)

Outcomes/ results (outputs), activities and resources, based on the SMART principle

Based on the above-mentioned priorities and challenges, AMAN identified the following Results/ Outcomes:

7.1 Program Outcomes/ Results

Objective	Results/ Outcomes
1. Promote community-based action in support of anti-corruption efforts and build the NIS	1.1 Citizens are more aware of the promotion of integrity, fight against corruption and accountability for public performance
	1.2 Embracing the promotion of integrity and fight against corruption in their strategies, CSOs are qualified and participate in the oversight of public performance
	1.3 Palestinian media is empowered to control public performance and take part in the anti-corruption effort
	1.4 University and general education curricula incorporate concepts of the principles of transparency, values of integrity, systems of accountability, causes and impact of corruption
2. Promote the values of integrity, principles of transparency, systems of accountability and fight against corruption in public administration, public financial management, and service provision to the Palestinian public.	2.1 Adopt measures to ensure promoting the integrity and anti-corruption system at line ministries and non-ministerial government bodies which deliver public services
	2.2 Adopt recommendations on procedures and policies to promote official control over private sector operations and eliminate conflict of interests
	2.3 Work environment at LGUs is immune against corruption
	2.4 Stakeholders adopt practical procedures and systems to enhance budget and public financial management
3. Consolidate efforts to expose corruption and corrupt individuals and prevent impunity by justice sector actors and law enforcement agencies.	3.1 Adopt legislation and processes in support of the NIS and efforts to expose corruption, prevent impunity and promote political integrity.
4. Develop the institutional and organizational performance of Aman Coalition to fulfil its mission, vision and national, international and Arab partnerships, and to respond efficiently and effectively to emerging priorities	4.1 The financial and human security sustainability required to achieve the strategic security objectives are provided
	4.2 Aman House of expertise and source of knowledge in the field of fighting corruption and building integrity systems and systems at the national, Arab and international level.
	4.3: Effective AMANs Broad and assembly participation in policy-making, guidance and internal audit and accountability.
	4.4 Effective institutional mechanisms that enable citizens and Palestinian and international institutions to implement emergency / rapid activities and initiatives in strengthening the integrity system and fighting corruption at the local levels implemented

Implementation and managing organization

AMAN was established in 2000 as a civil society organization that seeks to combat corruption and promote integrity, transparency and accountability in the Palestinian society. The Coalition was first formed by an initiative from several civil society organizations working in the field of democracy, human rights and good governance. In 2006, the Coalition was accredited as a national chapter for Transparency International and renewed its endorsement in 2016 following an external review and evaluation supervised by the membership board of Transparency International.

As part of the global anti-corruption movement and of international alliances and partnerships with relevant specialized coalitions and organizations - AMAN plays a key role in the transfer and contextualization of necessary international knowledge and tools to combat corruption in all sectors.

Top management of AMAN consisted of three entities: A general assembly of 29 representatives of public bodies and Palestinian figures interested in good governance, the rule of law and fighting corruption. Board of Directors (who is assisted by anti-corruption advisor and internal audit committee) includes four women and six men. the third is the Executive Director. Next comes the heads of three major departments of AMAN: Operations (Monitoring and studies

AMAN employs a total of 30 (18 female and 12 male) staff members. While five are based in the AMAN Gaza Office, 25 staff members are stationed in the Ramallah Office. AMAN team members possess the technical and managerial merits and experience required to carry out their duties efficiently. AMAN is adhered with the highest standard of transparency. (AMAN's BoD, team structure, financial reports are published on AMAN website).

AMAN has developed several internal systems that enable it to stick to the best financial and administrative practices including financial and administrative system, conflict of interest policy, anti-corruption and Fraud policy, code of conduct, complaint system, monitoring and evaluation system...etc. (Our policies and bylaws are published on our website in Arabic) <https://www.aman-palestine.org/ar/about-aman/about-organization>

Key stakeholders of AMAN are approximately 50 CSOs, media organizations, local governments, state institutions, including ministries, schools, and universities in the West Bank and Gaza.

AMAN Membership in Regional and International Networks: UNCAC Coalition, No Impunity Task Force Campaign, Affiliated network for social accountability (ANSA), Arab Parliamentarians Against Corruption (ARPAC), Arab Anti-Corruption and Integrity Network (ACINET)

Organizational Approach

Vision and aspiration: A Palestinian society free of corruption.

Mission: Mobilize efforts to promote integrity and combat corruption, drawing on a lawful activity sanctioned by the Palestinian law, public support, and full membership of Transparency International.

Our Believe: Values governing AMAN and its partners' functions

In its work, AMAN is committed to setting up a governance model of civil society functions, stressing compliance with a set of integral values in the operations delivered by relevant managers and staff. In its policies and procedures, as a role model for Palestinian society, AMAN adheres to maximum transparency and carries out operations in tandem with an effective monitoring and evaluation (ME) system. The Coalition is committed to a set of values and principles, including but not limited to:

Transparency: This means clearly defined internal regulations and procedures for both AMAN and its partners, including national and international institutions, individuals, experts, and donors. For us, transparency also reflects publicly accessible procedures, objectives and goals in our work, as well as public disclosure of applicable policies, particularly financial, administrative, employment and contracting policies. Additionally, transparency means **publication** of all administrative, financial, performance and program reports. Any relevant information is also **made publicly available**, without prejudice to the privacy of staff or members.

Accountability: AMAN's Board of Directors and Executive Director are committed to carry out powers and responsibilities as authorized by AMAN's General Assembly. To this avail, AMAN's Board and Executive Director develop anti-corruption policies, Programs and plans and **submit information and explanations** to General Assembly members, member institutions, and national

and international partner organizations. Access to information is provided to all government bodies, research centers, and persons with interest in integrity and fight against corruption. AMAN also releases periodic reports on the effectiveness and efficiency of its Programs and policies.

Integrity: AMAN's Board always ensures that members and staff abide by a **code of professional conduct that is grounded in honesty, trustworthiness and sincerity**, privileging the principle of fair, equal and non-discriminatory treatment of all. At all times, AMAN members and staff behave responsibly and objectively in institutional and fund management. AMAN always ensures there no conflict of interest affects the functions of AMAN staff and Board.

Solidarity: AMAN works towards supporting the just claims of unions, interest groups, coalitions and networks at national, Arab and international levels.

Courage: Together with its partners and the coalitions led or represented by AMAN, AMAN will propose cases of suspicions of corruption or any gaps in the integrity and anti-corruption system in all sectors. AMAN will do so **resolutely, clearly**, and without favor or compromise with officials in the institutions concerned.

Justice: In its operations, AMAN will stand by the causes of vulnerable groups and areas in society.

Democracy: AMAN is committed to periodic elections, allowing all managements to play their assigned roles. AMAN also complies with the culture of respect for difference, ensuring that disagreements in debate and discussion between members and partners are positive. AMAN renounces discrimination based on the place of residence, gender, religion, age, or belief. The Coalition is further committed to ensuring the broadest public participation in policymaking and planning processes.

Sustainability

AMAN reinforces its work by ensuring that it has sustainability when the planned activities are completely implemented, and the funds expire. The sustainability exists as follows:

Knowledge, skills and competencies: A large volume of AMAN's program is focused on building the capacity of different sectors and society groups on the definition, different forms and

reasons for corruption in Palestine, and the integration of developed corruption preventive measures and tools to combat it. AMAN ensures that many of these organizations and groups have the knowledge, skills and competencies to design programs that reach a wide audience for promotion of ITA and combating corruption. This is addition to integrating them into the established anti-corruption groups and teams which represent the right arm of AMAN whether for monitoring the public budget, performance of security sector, drafting legislation, contributing in the UNCAC self-assessment, SDGs oversighting and other work. A number of educators have been trained and supporting materials and a university text has been developed and made available for use by schools and universities. As of present 10 universities teach the text, reviewed periodically by AMAN, at their institutions and it is noteworthy that the first university offering this course was in 2007 and continues to offer and teach this text till now.

Research: AMAN through the program will produce solid information and data on corruption in Palestine via assessments and research that utilizes qualitative and quantitative methodologies in addition to public opinion polls. The research will be conducted by AMAN's Monitoring & Studies Unit, with the assistance of external researchers as needed. This leads to not only sustainable knowledge, skills and competencies of the AMAN team but also that of a wide pool of researchers in Palestine. Noteworthy, is the fact that AMAN shares the drafts of the reports with various stakeholders openly at workshops and meeting prior to finalizing, printing and wide dissemination as well as uploading at AMAN's website for access to anyone. Thus, sustainability of this information is secured.

Publications: Different types of publications are customized and produced on corruption, anti-corruption, preventive measures and tools for different stakeholders. This includes reference materials, children's stories, university textbook and school teacher supporting materials. The publications are produced in cooperation with experts and are appropriate for the target groups intended.

Legislations: AMAN and through its legal work, promotes and facilitates the preparation of legal and analytical review reports about current Palestinian legislation and its compliance with international and regional anti-corruption conventions. This is the foundation for the preparation

of all necessary draft laws/amendments/articles produced. This work is crucial for the sustainability of anti-corruption measures and mechanisms. Through its lobbying activities, and on ratification/amendment/endorsement of prepared laws, AMAN ensures that sustainability exists at a high level by the government itself.

Networks: AMAN program will focus on building partnerships and networks as supporting arms in its work and key in sustainability of such work. The war against corruption in Palestine is the responsibility of each citizen in Palestine regardless of age, gender, education, employment, political affiliation, social and/economic status. Due to this, AMAN has established several local groups, engaged as members in regional and international efforts to further strengthen the role of civil society in the endeavour to engage in the national efforts of promoting integrity and combat corruption.

Gender and equal rights

AMAN is committed to mainstream gender in the fight against corruption and better understand the linkages between gender and corruption. Gender mainstreaming will be integrated in the program work in various ways:

- ✓ Research: Knowledge will be generated on the linkages between gender and corruption;
- ✓ Communication: Gender will be made more visible in our tools and publications
- ✓ Advocacy: Strategic partnerships will be established in the gender arena.
- ✓ Operations: beyond programmatic work, gender considerations will be taken into account in all operations and work processes including in activities relating to HR management.
- ✓ Programmatic work: Gender considerations will be included at all parts of the program, and mainly the following areas:
 - ✓ Building Capacity: AMAN will mainstream gender whenever possible and as much as possible by ensuring that for example work with school students includes equal number of girls and boys. AMAN will ensure the inclusion of female educators and leaders as well. This ensures that girls are included when teachers educate on values of integrity and girls grow up knowing what values of integrity are and what their role is as they conduct projects in anti-corruption in their schools and communities.

Moreover, AMAN will work with NGOs to so build their capacity to include ITA standards within their strategies and implementing awareness raising and social accountability activities. When selecting NGOs AMAN will make sure to add gender as a main criterion for selection.

- ✓ Monitoring Public Budget: The Civil Society Team for Public Budget Transparency (CSTPBT) will be involved in carrying the voice of the vulnerable including women and girls to lobby for inclusion of their needs in the Citizen Budget before it is endorsed. This empowers females by giving them a voice and sensitizes the government by making it more responsive to the needs of females.
- ✓ Awareness and advocacy campaigns: will reach a diverse population of citizens including women through media broadcasts, printed materials, resources available electronically on AMAN's website as well as hardcopies at the Research and Development Unit. Special awareness campaigns will target women organizations; both national and community based, to enable AMAN's reaching out to as many women as possible with its programs. The outsourcing program will only target women organizations in its first year to encourage them to engage in fighting corruption.
- ✓ ALAC: although not part of this core program will conduct outreach visits targeting women increasing their awareness on corruption, anti-corruption work, and encouraging them to report corruption if they have been victims or have witnessed it.