Partners for Governance Integrity and Enhanced Accountability

Strategic Plan

2025

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Part one: Preface

Enhancing accountability and integrity of Governance: two main elements for eradicating corruption and strengthening social cohesion to end the occupation and achieve a development based on justice and equality

All Palestinians in the State of Palestine strive to achieve "A stable democratic state that respects human rights, guarantees equal rights and duties and provides a safe environment for its citizens with respect for the rule of law; ensures equality between men and women, and values its people's social cohesion and solidarity. Palestinians also seek to have an open, transparent and responsible Palestinian government that responds to their needs and provides them with basic services efficiently and effectively ...."

> Corruption causes serious damage to democracy, undermines the rule of law and leads to human rights violations, market distortion and deterioration of the quality of life. It also provides fertile grounds for organized crime and other forms of dangers that threaten the security of everyone.

Although the phenomenon of corruption exists in all countries, large and small, rich and poor, its effects in the developing world are far more devastating, especially for the marginalized groups such as women and the poor, since corruption wastes funds for development, undermines the government's ability to provide basic services, leads to prejudice and injustice as well as hinders investment and international assistance.

Therefore, if corruption has a wide range of harmful effects in societies everywhere, these harmful effects are increased for the Palestinian society due to being under Israeli occupation and hence combating it takes on an important and different characteristic that requires fortifying the national internal environment to mobilize efforts to resist this occupation. Furthermore, it demands that Palestinians must strengthen their resilience, solidarity and their willingness to sacrifice for their national liberation including increasing their confidence in their leaders and officials.

Corruption is defined as "abuse of entrusted power for personal gain". This applies to the public sector as well as to the business sector and covers all levels local, regional and international. Moreover, it includes small cases of corruption that affect citizens' daily lives, and grand corruption that harms the entire community and applies to forms of corruption that relate to wasta, nepotism, financial and material bribery. It also applies to political corruption with the aim of preserving one's position, authority, status or wealth and to sexual abuse and harassment in the work place. The Palestinian society has become more aware of the reality of corruption and its negative effects on their well-being, wealth and prosperity as well as their liberation from Israeli occupation. They also came to realize the negative effects corruption has on the quality of services, primarily social welfare services as a result of the monopoly and dominance of large investors. In addition, the Palestinian society has become more alert of the demand for economic equality as a basis to achieving social justice, under which all channels of tax evasion and or major

economic crimes are stopped, and social responsibilities are not disregarded by the private sector's companies. All the above calls for holding officials accountable for the sake of public interest.

We believe that public interest is determined by higher sectoral and cross-sectoral policies, and by the 2030 Sustainable Development Goals (SDGs) adopted by the State of Palestine. It is also defined by the provisions of relevant international agreements, especially those that guarantee public freedoms and respect for the special needs of vulnerable groups. In addition, it is defined by achieving the desired results in the various sectors, especially in service sectors such as health, water, energy, education and social protection, based on standards and foundations of justice and integrity of the judiciary.

Accountability is generally considered a mechanism for combating corruption as well as a remedy for administrative and regulatory deterioration, in addition to being closely linked to integrity and transparency at work. Formal and social accountability require that elected or appointed officials, ministers, and other public servants submit detailed periodic reports concerning the running of the institution or ministry they head including the extent of success and or failure of policies implemented. Accountability also means a commitment to the principle that citizens have the right to access reports and information concerning the work of public officials such as: parliamentarians, ministers, government employees and senior officials. This is to ensure that their work is consistent with values based on justice, clarity and equality, as well as in-line with the law's specifications of their tasks and duties. Being accountable will earn these officials the legitimacy and support of the people hence ensuring their continuity at work. In addition, accountability contributes to preventing abuse of power and increases the effectiveness and efficiency of public services' provision.

> Integrity: a set of values related to honesty, faithfulness, and dedication at work.
> Transparency: Clarity of regulations and procedures within the institution and in the relationships with its beneficiaries. Transparency is also about ensuring that the public institution' actions, objectives and goals are made public.

The SDGs focus on mobilizing efforts to eradicate poverty in all its forms and reduce inequality. The Goals also address climate change and ensures the engagement and inclusiveness of all in the efforts so that no one is left behind. The Sustainable Development Plan allocated Goal 16 of the SDGs to **"Peace, Justice and Strong Institutions".** The aim of this goal is to encourage the existence of peaceful, inclusive societies in order to achieve a sustainable development. It also to provide the possibility of access to justice for all, and to build **effective and accountable institutions at all levels.**

Under Goal 16, governments in participation with civil society and local communities, will work to find and implement durable solutions to reduce violence, achieve justice, and combat corruption. They will also work to ensure inclusive participation, freedom of expression and people's participation in decision-making, as well as ensure the enforcement of laws and policies without any form of discrimination, in addition to resolving disputes through effective political and judicial systems. In order to create peaceful societies where justice prevails and no one is marginalized, Goal 16 requires accountability of public

institutions at the national and local levels. And for these institutions be ready to provide basic services to families and communities fairly and without bribery. Moreover, Goal 16 **"Peace, Justice and Strong Institutions"** identified 12 destinations or objectives to achieve the goal. Among these objectives is several targets that set priorities for combating corruption at the international level, until 2030.

Part two: AMAN Coalition, continued partnership and commitment to values and approaches to eradicate corruption.

Vision: A Palestinian society free of corruption (an ambition of AMAN and its partners)

Mission: AMAN continues to carry out its role to: lobby and mobilize efforts to promote accountability and enforce anti-corruption mechanisms based on Palestinian laws and popular support, as an accredited member of Transparency International.

AMAN's ambition and mission statement is based on provisions of the amended Palestinian Basic Law, the Palestinian Declaration of Independence, the UNCAC and the amended Anti-Corruption Law of 2005. The Anti-Corruption Law, however, did not define corruption but rather listed acts of corruption with some references as follows:

1. Bribery as stipulated in the penal laws in-force.
2. Embezzlement as stipulated in the penal laws in-force.
3. Forgery and counterfeiting as stipulated in the penal laws in-force.
4. Investing in one's job as stipulated in the penal laws in-force, (i.e., use of one's position for personal interest).
5. Abuse of trust as stipulated in the penal laws in-force.
6. Complacency in carrying out one's duties on the job stipulated in the penal laws in-force.
7. Money laundering resulting from corruption offences stipulated in the Palestinian Anti-Money Laundering and Terrorist Financing Law in force.
8. Illicit gain.
9. Abuse of influence (trading)
10. Abuse of Power.
11. Using Wasta, nepotism and or favoritism (i.e., taking what is not rightfully yours).
12. Failure to declare or disclose on investments, property or benefits that lead to conflicts of interest, if required by laws and or regulations, and with the intention of seeking personal gain directly or indirectly.
13. Obstruction of justice.

The Coalition for accountability and Integrity- AMAN, as stated in the preamble to the UNITED Nations Convention against Corruption (UNCAC), considers that reducing corruption is no longer a local affair but a transnational phenomenon affecting all societies and economies, which requires international efforts and cooperation to prevent and combat it. Therefore, implementing a comprehensive and multifaceted approach, known as an effective national integrity system (NIS), is necessary to prevent and combat corruption, reduce its chances and increase the immunity of public institutions, officials and employees against it. Noting that the NIS includes all official state authorities and institutions (public sector) as well as civil society organizations CSOs.

Ever since its inception, AMAN believes that eradicating corruption contributes to reducing poverty, **improving services** for marginalized regions and groups, play a role in job creation and contributes to the **equitable distribution of resources**. Achieving this will in turn reflect on improved health, education and welfare services for all, hence promoting **social cohesion** and the achievement of SDGs. In addition, all of the above will strengthen the unity, steadfastness and struggle of the Palestinian people for national liberation and access to the rule of law.

The three main goals of the UNCAC
-To promote and strengthen measures that prevent and combat corruption more efficiently and effectively.
-To promote, facilitate and support international cooperation and assistance in preventing and combating corruption, including the area of asset recovery.
-To promote integrity, accountability and proper management of public affairs and public property.

In line with Article 1 of the United Nations Convention Against Corruption (UNCAC) "Statement of Purposes", AMAN in its capacity as the "House of Expertise", seeks to work jointly with its partners by providing technical assistance, advice and consultations to all relevant parties in the integrity and anti-corruption systems in all sectors, which serves to achieve the purposes of the Convention. This is in addition to its oversight role of monitoring the state of integrity and combating corruption, activating the role of civil society organizations (CSO) and media. AMAN also is diligent in creating a working environment for local government units (LGU) and public institutions that work on reducing the widespread of corruption and exposing its crimes through intense supervision, pressure and advocacy. Moreover, AMAN is working to provide literature and studies in the field of integrity and anti-corruption as part of the coalition's drive to serve as a Palestinian center and house of expertise in this area, at the national, regional and international levels.

In confronting the corrupt, AMAN and its partners rely on deriving the legitimacy of their work from the Palestinian laws and people as well as from being an active and effective member of the Arab and international transparency and anti-corruption movement, in addition to being accredited by Transparency International (TI) since 2006.

AMAN will seek to exercise its national role in mobilizing popular efforts to combat corruption in Palestine and to dry up its sources. This means it will work in partnership with people, trade unions, media, academicians, CSOs representatives and grassroots institutions to contribute to decisions or to influence - collectively or individually - decisions affecting aspects of preventing and combating corruption. AMAN and partners will also work to create conditions conducive to achieving the values integrity, principles of transparency and accountability systems.

Values governing our work and the work of our partners

Being considered a role model for NGOs in the Palestinian society, AMAN is determined to practice what it preaches in terms of good governance. This is visible through the adherence of its employees and senior management to a set of values while carrying out their duties. In addition, AMAN is also committed to implementing its projects and programs through procedures and policies with the highest degree of transparency under effective control and evaluation systems. With this in mind, AMAN will adhere to the following values and principles:

Transparency: Transparency means that internal regulations and procedures are clear to us and our institutional and individual partners and experts and funders whether national or international. It also means that aspects of our work are made public and include procedures, goals, objectives and policies, especially those related to financial, administrative, employment and contracting. Moreover, transparency means to us the publication of all of our administrative, financial, performance and programs' reports, in addition to the **disclosure** of information without violating personal information of employees or members associated to the institution.

Accountability: As commissioners of the general assembly, the board of directors and the executive director are obliged to have powers and responsibilities related to the development of relevant policies, programs and plans in combating corruption. They are also obliged to **provide information and explanations** first and foremost to members of the general assembly, member institutions of the coalition, national and international partner organizations. Also to all official and research national institutions and to those interested in integrity and combating corruption. Last but not least, AMAN is committed to providing periodic reports on the effectiveness and efficiency of its programs and policies.

Integrity: AMAN ensures that all members and employees' conduct is based on **honesty, trust and sincerity**. It also insists that everyone must be treated fairly and without discrimination or bias, and to always act professionally and objectively in the management of the institution and funding. Furthermore, AMAN ensures the absence of conflict of interest in the work of employees and members of the board.

Solidarity: AMAN will support **just demands** adopted by federations, unions, interest groups, coalitions, and networks whether at the national, Arab, or international level.

Courage: AMAN, its partners, coalitions where AMAN is a member, or coalitions led by AMAN will **boldly and clearly** raise issues related to corruption suspicions or any gaps that arise in the integrity system and combating corruption, in any or all sectors without compliments or bargaining with officials of the institutions concerned.

Fairness: AMAN will be biased towards the vulnerable groups and regions in the Palestinian society when implementing projects and programs.

Democracy: AMAN is committed to holding elections regularly and to activate its leadership bodies to do their part. It also respects differences and hence ensures that its members and partners perceive differences as positive factors in their dialogues and discussions. In addition, it is committed to rejecting discrimination related to place of residence, sex, religion, age or belief, and will ensure the broadest participation of people in policymaking and plans.

Part three: AMAN, the Palestinian institution accredited by Transparency International- learning, building and rallying towards continuity and change.

The Coalition for Accountability and Integrity -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 a number of CSOs working in the field of democracy, human rights and good governance. It focused its efforts on launching a national anti-corruption program, promoting integrity values, transparency principles and accountability systems in the various Palestinian sectors as well as building a national integrity system (NIS)[1].

AMAN is governed by a general assembly of 30 members representing the general bodies of the member institutions, in addition to a number of individuals and academics who are active in the field of good governance and anti-corruption. The coalition is run by a board of directors consisting of 11 members (3 women and 8 men) who are influential in political and social life and experienced in the field of management and organization of NGOs, investments, research and international relations. Supporting the general assembly is an internal committee consisting of three of its members and tasked with follow-up on the reports prepared by the internal auditor before it is submitted to the Board of Directors.

AMAN's executive staff consists of 29 employees (17 women, 12 men) 23 of whom work in the Ramallah office, while 6 are in the Gaza office. The executive staff is distributed to operations, financial and administrative departments and the regional office in Gaza, in addition to a range of support units and positions. The staff is also supported by a group of academicians, researchers and experts. The number of specialized experts currently supporting AMAN is estimated at 40 who have been trained and engaged in studies, research, training activities and consultations related to the national integrity and anti-corruption system over the past years. Lastly, the coalition and the group of academics, researchers and trainers are actively involved in activities and interventions across Arab countries.

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[1] The AMAN Coalition obtained its registration certificate from the Palestinian Interior Ministry in 2004 as a Non-Profit Palestinian NGO, under the name of "Coalition for Integrity and Accountability (AMAN) Union.

AMAN works to establish initiatives and coalitions to maximize oversight and accountability efforts in the management of public affairs and finances. In this regard, the **Civil Society Team for Enhancing Public Budget Transparency** (the civil Team) is considered one of the most prominent of these initiatives. The Team includes more than 24 NGOs working in the field of human rights, the rule of law and good governance in addition to the **Civil Forum for the Promotion of Good Governance in the Security Sector**, which was established in 2014. The Forum aims to involve civil society institutions in community oversight and accountability concerning the work of the security sector.

AMAN succeeded in building partnership with many CSOs in the framework of integrating concepts, tools and means of promoting integrity and combating corruption in their strategies and programs. In addition, AMAN motivated and empowered these institutions through capacity-building activities to enable them in their task of spreading awareness within their targeted communities. Moreover, AMAN was always ready to provide technical help related to anti-corruption and or the NIS, to any institution upon request.

In terms of the relationship with Transparency International (TI), the Coalition obtained full accreditation from the organization in 2006, which was achieved after a strenuous process of comprehensive reviews and evaluations on good governance, integrity, transparency and accountability standards and indicators within AMAN, and supervised by TI's Membership Council. Furthermore, AMAN contributed and continues to contribute significantly to building and achieving TI's mission and strategy through participating in its activities at the regional and international levels. Presently, AMAN is playing a major role in sharing experiences and building the capacity of TI's Arab and international branches. During the previous strategy period, AMAN implemented a regional program to form and train civil society coalitions on control of public budgets management in Jordan, Tunisia, Morocco, and Lebanon.

AMAN depends on two main sources to fund its core program: **1- the main program partners (Governments of Norway, the Netherlands and Luxembourg)**, who have been the main source of financial support to AMAN since 2004. 2- Supporting projects that account for 25% of the total funding comes from various entities, most notably: Oxfam, EU, TI, UNDP, DFID, and others.

Earned through hard work, AMAN succeeded in becoming the **Palestinian House of Expertise** specializing in enhancing integrity values and anti-corruption efforts, as well as being a major contributor in placing issues of integrity and anti-corruption on the Palestinian agenda and on the priority lists of national institutions. AMAN also left its mark at the national and official levels through its efforts in developing the Illicit Gain law, pressure to establish the Anti-Corruption Commission (ACC) and the signing of the UNCAC.

AMAN is considered a main source of information on the status of corruption at the local and regional levels. This recognition is based on the many studies and research reports prepared by AMAN specializing in diagnosing and analyzing corruption within the various Palestinian sectors. Results of these reports and studies have become a major source of recommendations for Palestinian decision makers to strengthen anti-corruption policies, procedures and measures to protect public funds. Moreover, AMAN exerts efforts in **providing legal advice and support to victims of corruption. It also works on raising citizens' awareness on corruption and its forms as well as encourage citizens to report corruption acts if they fall victims or witnesses to it**, all through the Advocacy and Social Accountability Unit.
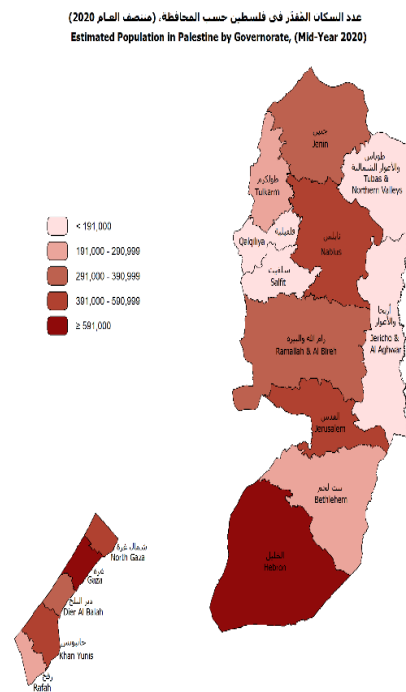
The first four AMAN strategies 2000-2016 focused on popularization of the concepts of integrity, transparency and accountability in the Palestinian society, as well as on raising awareness of the dangers of corruption and ways and tools to prevent it in all sectors. Near the end of 2016, AMAN conducted a

comprehensive review of all past action plans where it concluded that a shift from the awareness raising role to being a **Watchdog** is needed, which was encompassed in its 2020 strategy. This meant moving from preventive intervention to focusing on oversight, advocacy, mobilization and engagement of citizens in lobbying and influencing activities. The shift is intended to bring about change in public administration of the state (i.e., more transparency concerning public resources and in particular transparency of the public budget).

AMAN's sixth strategy, partners for integrity 2022: this strategy was based on the premise that eradicating all the forms of corruption, small and large, requires first and foremost an able and well-informed Palestinian society on subject. To achieve this, a national program is needed to mobilize efforts to promote integrity and combat corruption to be culminated in a national strategy that seeks to shield public institutions from corruption and is able to activate the role of regulatory institutions. The strategy must be accompanied by an objective and applicable action plan where all parties can participate in its drafting. It is equally important that the plan comes with an allocated budget and is subject to follow-up and evaluation throughout the life of the plan.

Part four: General context: enabling and impeding factors affecting anti-corruption efforts.

High unemployment and poverty provide opportunities for widespread corruption

عدد السكان المقدّر في فلسطين حسب المحافظة، (منتصف العام 2020)
Estimated Population in Palestine by Governorate, (Mid-Year 2020)

The total area of Palestinian land in the West Bank (WB) and the Gaza Strip (GS) is 6,025 square kilometers, of which 5,660 square kilometers are in the WB and 365 square kilometers in the GS. The GDP reached US$15,829.0 million in 2019, and Gross National Income for the same year was US$18,415.6 million. GDP per capita for the same year was US $3,378.3, with a significant gap between the WB and the GS in favor of the WB.

There are 16 administrative units in Palestine (governorates), 11 in the WB and 5 in the GS. Also, there are 455 local government units, 25 of which 25 are in the GS, according to the Central Election Commission (CEC)[2].

Poverty among the population according to the "monetary" poverty line, 2017, was 29.2% (13.9% in the WB and 53% in the GS). The multidimensional poverty index by region (percentage), for the same year, was 24% and the severity of poverty for the same year was 42.4%[3].

The continued high rates of unemployment and poverty in Palestinian society, exacerbated by the corona pandemic and Israeli economic policies in addition to the siege and war imposed by Israel on the GS increase opportunities for the widespread of corruption. Other contributors that provide corruption opportunities include structural reasons in the Palestinian economy

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[2] See the Central Election Commission https://www.elections.ps/tabid/648/language/ar-PS/Default.aspx
[3] Palestinian Central Bureau of Statistics, 2021. Palestine in numbers 2020.

that limit national efforts to improve the economic situation and hence provide employment opportunities needed, especially for educated men and women.

Palestinian society: young, educated and masters the use of technology and social media

The Palestinian society is considered a young society where 38% of individuals are under the age of 14 and only 3% are aged 65 years and over. Life expectancy in 2020 in Palestine was 74.1 years, 73 years for males and 75.3 for females.

The population density in Palestine is 826 person per l/km2, with 528/km2 in the WB compared to 5,453/km2 in the GS.

The average family size in 2018 was 5 (4.6 in the WB and 5.7 in the GS). According to the 2018 Labour Force Survey, 11% of households are headed by women in Palestine, 12% in the WB and 9% in the GS.

Statistical data indicate that the illiteracy rate of individuals aged 15 years and over was about 3% (1% among males and 4% among females), and 15% of individuals 15 years and older have a bachelor's degree and higher. Also the labour force participation for 2019 was 44.3% (69.9% males and 18.1% females), and the unemployment rate for the same year was 25.3% (21.3% males and 41.2% females).

At least 96% of Palestinian households own mobile phones; the percentage of people aged 18 and over who own a cell phone or smartphone is 89%. And 65% of Palestinian families have internet access at home, while 64% of individuals aged 18 and over used internet, 69% in the WB and 57% in the GS[4].

The recent Israeli aggression against Jerusalem and the GS revealed the importance and role of the youth in the Palestinian society due to education and smart use of technology and social media. It also revealed an active civil society, especially in the human rights field as Palestinians everywhere spoke with one voice against the last Israeli aggression on the GS. This contributed to strengthening the regional and international mobilization as well as the community and international control over what is happening in Palestine.

Israeli occupation, practices and blockade of the Gaza Strip undermine anti-corruption efforts

Israel continues to colonize the West Bank, blockade the GS and isolate Jerusalem for the rest of the Palestinian cities. In addition, it also continues to apply its policies of settlement expansion and land confiscation as well as to have control over Palestinian natural resources, especially water, and to control borders and the sea. In addition, Israel has full control over all customs and clearing revenues (Maqassa), and it is in control of supplying water and energy to Palestinians living in the WB and GS.

> In May 2020, due to Israel's decision to annex huge areas of the WB, the Palestinian leadership announced the disintegration of its obligations stated in the Palestinian-Israeli agreements. This brought bilateral relations such as

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[4] Report issued on 11/7/2019 by the Palestinian Central Bureau of Statistics.

Furthermore, Israel's colonial policies directly weaken Palestinian official institutions through piracy (i.e., illegally taking Palestinian government clearing tax funds) collected at borders in the form taxes known as Maqassa, hence affecting the ability of official institutions to provide services to citizens. Capacity of regulatory and security institutions is also affected in terms of the government's inability to prosecute violators due to Israel's control over most of the Palestinian land. Moreover, the Israeli mafia has transformed some areas of the WB as a back yards for money laundering, cultivation and trafficking of drugs. Israeli control over these areas constitutes an outlet for impunity whether at the level of daily practices by the occupation authorities in terms of sheltering corrupt people, or at the external level as the Palestinian authority (PA) has no control over areas classified "C", borders and or crossings and hence is unable to prosecute corrupt individuals. Facilitation and sheltering of corrupt people by Israel, due to the abovementioned reality, is especially applied to economic crimes.

The Israeli aggression on the GS in May 2021 caused heavy material and economic losses related to the destruction of the infrastructure in the Strip and the displacement of many people due to the full or partial destruction of buildings and houses. This called for a shift in priorities for the Palestinian government and CSOs leaders to place the rebuilding of the GS at the forefront and provide immediate humanitarian assistance to those affected by the Israeli aggression.

The internal division: two political Authorities equals scattered anti-corruption efforts

Lack of openness of the government and official institutions and absence of a participatory approach at work weakens opportunities to adopt results of the NIS.

The continuing political internal division between the WB and GS has affected the institutional reform and anti-corruption efforts due to its devastating long-lasting results. These results include but are not limited to: the existence of the PA government in the WB and the Hamas government in the GS, the dissolution of the Legislative Council, the absence of periodic presidential and legislative and LGUs elections in the GS. Affected was also the community debate on the effectiveness and independence of the judiciary and the decisions of the Higher Judicial Council. This is over and above the continued decline in the economic situation following the Palestinian government's refusal to receive the clearing funds in the first half of 2020, based on the Palestinian leadership's decision to stop the relationship with the Israeli side for more than six months, from May 19, 2020 to the end of November 2020.

The year 2020 showed that the hopes held by CSOs of an open Palestinian government that is willing to cooperate, which began at the time of its inauguration, faded. This was due to the government's isolation of itself and lack of interest in CSOs efforts and recommendations of their reports on the management of public funds and affairs such as appointments related to cronyism and favoritism, which only served those in power and their relatives. Moreover, the spread of the COVID-19 pandemic also proved that the government lacks readiness to deal with natural or health disasters. This was evident by the absence of: a law to regulate the state of emergency and a national plan in that regard, lack of readiness of the State of Palestine and the weak integrity of the government, fragility of measures and actions taken by the Government to protect state institutions from corruption and failure to activate the National Disaster

Center. Moreover, the Council of Ministers in Dr. Mohammad Shaaya's government continued to publish only the titles of decisions of its meetings through an electronic platform dedicated to this purpose, hence decisions were not fully published, nor have the previous archives of previous governments in this regard been republished.

The Corona pandemic and emergency status impose health, social and economic impacts on all groups in society and affect the integrity of governance

The spread of the Corona pandemic had direct and indirect health and economic impact at the social, economic and institutional levels in 2020. Also in 2020, the PA's declared a state of emergency, which continues until today. These factors weakened any plans for promoting integrity and combating corruption including attempts to prevent impunity of the corrupt. Moreover, the governance integrity was negatively affected as well due to the widespread phenomenon that the PA's decision-making was not in the public's interest while being justified with excuses related to the state of emergency.

The state of emergence took its toll on the Palestinian citizens and hence government and people had to reshuffle their priorities and decisions. For the government, the most prominent was the approval of an emergency budget and the reordering of government spending, with more attention given to social and health protection services in light of the increasing number in unemployment and citizens' need of vaccines. The NIS was also affected and a range of related issues surfaced, most important of these are: Social assistance provision, fair access to vaccines and medical services for Corona patients and transparency of information related to the health and economic status. Moreover, the state of emergency also greatly weakened areas of public finance management in terms of compliance with the necessary standards and provisions of the laws, such as the Public Procurement Law on Public Tenders. In addition, poverty deepened under these conditions where prior to the spread of the Corona virus approximately a quarter of Palestinians lived below the poverty line, according to the World Bank. This figure rose to 30% in the WB and 64% in the GS since the spread of the pandemic. Furthermore, the rate of unemployment among the youth reached 38%, which is well above the Middle East and North Africa average. Also potentials for a better economy remain constrained due to restrictions imposed on the movement of people and goods[5]. The prime minister confirmed that the total losses to the Palestinian economy for 2020 amounted to about $3.8 billion (27%) of the approximately 14 billion that make up the value of GDP.

Political and economic siege on Palestine: "the Deal of the Century" an American initiative; regress of Arab leaders' positions on the Palestinian cause

The announcement of U.S. President Donald Trump, at the end of January 2020 of the U.S. Middle East Peace Plan known as the Deal of the Century, provoked angry Palestinian reactions due to: changing the rules of the political process that are based on UN resolutions calling for the Israeli withdrawal from Palestinian land occupied in 1967, and the announcement's biasness towards the Israeli right-wing trends at the expense of Palestinian rights of establishing their state on their land occupied since June 4, 1967. The announcement was followed by U.S. pressure on Arab countries such as the United Arab Emirates, Bahrain, Sudan and Morocco to conclude normalization agreements with Israel in mid-September, as part of the pressure on the Palestinian leadership. This shifted priorities of public, institutions, political forces and parties to resist pressures, including financial pressures, hence affecting the reform agenda and related objectives on improving the management of public funds. Consequently, promoting integrity and

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[5] World Bank Economic Monitoring Report, June. 2020.

combating corruption had to take a back-seat position, not to mention the continued impact of the negative Israeli policies and practices on the Palestinian economy in terms of control over granting permits and approvals at borders and crossings in Jerusalem, the WB and the GS. These measures taken by the Israeli authorities are of course in their interest and to reinforce their control over Palestinian natural resources.

Continued human rights violations and restrictions on public freedoms

The year 2020 witnessed numerous violations of public freedoms by the PA in the WB and the authority in the GS in terms of abuse of power, which threatens the integrity of both systems. According to the Center for Media Freedoms (MADA), violations of media freedoms in Palestine in 2020 totaled 81, divided between Israeli, Palestinian and social media violations[6].

Also in 2020 the Independent Commission for Human Rights (ICHR)[7] data indicated that the number of complaints it received regarding torture and ill-treatment under the pandemic increased during the same period to reach 250 violations concerning the right to physical safety, in both the WB and GS. These violations included torture and ill-treatment of detainees such as severe beating and standing for long periods of time among other means of torture.

Complaints received by the Commission from March 5, 2020 to November 16, 2020 included (350) violations of the right to freedom and personal security in both the WB and GS. These violations included administrative detention without being presented to the competent judicial authorities and detaining citizens for exercising their legitimate rights. Violating legal procedures when carrying out arrests and refraining from carrying out judicial decisions to release detainees were also recorded.

Palestinian society continues to see that combating corruption is one of four main priorities

Growing community awareness of the weakness of the integrity of governance

In spite of Israel's continued aggressive policies towards Palestinians, medical and economic crisis and the negative impact of the internal political division, the majority of citizens continue to see corruption as one of the most important issues and problems facing the Palestinian society. In this regard, the October 2020 Citizens' Survey on the Status of Corruption and Combating Corruption in Palestine[8] indicated that the most important challenges needed to be addressed were: the economic crisis, combating corruption, the occupation's policies and the internal division. Results of the survey indicated: 26% of respondents considered that the main priority to be addressed is the escalation of economic crises, while 25%

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[6] Monthly reports issued by the Palestinian Center for Development and Media Freedoms (Mada) from 1/1-31/12/2020. https://www.madacenter.org/category/13/1/%D8%AA%D9%82%D8%A7%D8%B1%D9%8A%D8%B1-%D8%B4%D9%87%D8%B1%D9%8A%D8%A9

[7] See Pandemic Management State of Public Freedoms 2020 Department-Pandemic-Case-Public Freedoms2020-1605600399.pdf (aman-palestine.org)

[8] See Coalition for Integrity and Accountability Aman, Citizens' Survey on the Reality of Corruption and Combating https://www.aman-palestine.org/reports-and-studies/14706.html Palestine 2020.

considered corruption issues to be the most important, followed by policies of the Israeli occupation and the continuation of the internal division by 21% and 14% respectively.

This is in addition to the growing community awareness of the weaknesses of integrity in governance and increased demands for reform of the Palestinian political system; mainly the importance of holding general elections hence ensuring a peaceful transfer of power as well as providing a chance for young people to reach decision making positions.

A tangible role for Palestinian civil society in the various sectors of sustainable development and human rights, at the national and local level

Restrictions on civil society may limit its efforts to enforce public freedoms and combat corruption.

Many CSOs are active in the various sectors and play a significant role in the sustainable development and human rights sectors by providing services and championing the rights of various vulnerable groups. Moreover, the Government and international organizations consider CSOs to be key partners in achieving the SDGs and the national development plan. For these reasons, these institutions receive international and local financial and technical assistance to enable them to play their role.

However, despite this recognition of the role CSOs play, the PA president issued a Law by Decision No.7 of 2021 amending the Law No. 1 of 2000 on Charitable and Non Profit organizations encompassing some articles considered by CSOs as hindrances to their work. Examples include the article obligating NGOs to submit an action plan and an estimated budget for the fiscal year in line with the plan of the competent ministry. Also the article stating that employees' salaries and operational expenses in CSOs and NGOs should not exceed 25% of the total annual budget, and the one requiring these bodies to pay fees for application requests submitted to the Ministry of Interior. However, this Law by Decision was suspended following pressure campaigns by CSOs[9].

CSOs strongly believe that the single decision taking by the PA's executive authority concerning issuance of laws, systems and regulations without consulting them, and especially in regard to those related to the freedom and scope of work of these organizations, constitutes a setback to developments and achievements accumulated in previous years concerning cooperation, partnership and openness.

National cross-sectoral public policies and strategy to promote integrity and combat corruption strengthens national efforts

Continued international and Arab policies and support to promote integrity and reward corruption

In the first quarter of 2021, the Palestinian government launched a national development plan: "Resilience, Disengagement and Cluster Development towards Independence". The Plan was based on 40 other sectoral and development strategies with clusters documents, as well as our perspective on development, hence making development a lever for national liberation. The development plan is based on a national vision that recognizes the Palestinian people's right to self-determination and sovereignty

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[9] The Law by Decision No. 7 was suspended through another law by decision issued by the PA President on 11 May 2021.

and that Israel is a colonizer. The Plan also stipulates that the envisioned Palestinian state is based on a relationship between the voter and the elected to make Palestine a democratic state in which fundamental rights and public freedoms are respected. Also that democratic Palestine must be free of all forms of racial discrimination that are based on religion, race or gender. Its public officials and employees must be highly qualified in the various fields of public positions and employment and must remain far from monopoly, domination and nepotism. The plan also identified a range of public policies supporting national efforts to promote integrity and combating corruption, including:

Public Policy (4) restored democratic energy to Palestine by identifying a range of relevant policy interventions, including: a review of the constitutional framework governing the state so that the constitutional text is in line with international contractual and customary obligations; organizing democratic and periodic elections at all levels and safeguarding and protecting public rights and freedoms. A range of policies have also identified several relevant policy interventions, including Policy (7): strengthening responses of LGUs to citizens; Policy (8) upgrading the level of public services provided to citizens; Policy (11) enhancing the efficiency of public institutions; Policy (12) efficiency and effectiveness in managing available resources, particularly policy intervention, also strengthening the public procurement system to ensure transparency and accountability. In addition, **Policy (10) identified** the importance of **promoting integrity, accountability, transparency and combating corruption** in all of the government's work as well as ensuring access to information and strengthening the role of financial and administrative regulatory institutions.

> Palestinian vision of the National Cross-Sectoral Strategy to Promote Integrity and Combat Corruption: "A fair and anti-corruption Palestinian environment for a Palestinian society free of corruption"

The ACC launched The National Cross-Sectoral Strategy for Integrity and Anti- Corruption 2020-2022 "Citizenship, Empowerment, Reform" in accordance with the role assigned to it, which includes formulating anti-corruption policies, developing and implementing plans and programs in cooperation with relevant parties, as stipulated in the Anti-Corruption Law No. 1 of 2005 and its amendments. The strategy is based on the motto that: strengthening the integrity system is a concern for everyone and is the basis for obliterating corruption from the Palestinian society and meets commitments adopted by the higher political Will in terms of denying impunity to the corrupt. It is also the basis for all relevant institutions to adopt the strategy as a framework for accountability; mobilize and recruit supporting positions at the Arab and international levels, unify anti-corruption efforts and promote integrity at the national level.

The existence of sectoral plans and strategies linked to the 2021-2023 National Development Plan, such as the Sectoral Energy and Natural Resources Strategy and Management of Public Funds and the Civil Service Strategy is a powerful entry point of pressure for the implementation of these plans and strategies. It also presents an opportunity to amend or develop the laws and the legislative system to correspond with the mentioned plans and their desired results. Moreover, the PA's joining international conventions and charters such as UNCAC; the voluntary commitments to report completion such as 2030 SDGs; the existence of prepared reports by the government in this regard; the membership of the CSOs in the

National Team to implement objective 16 in addition to the National Cross-Sectoral Plan Against Corruption, can all be utilized to carry out lobbying and advocacy campaigns in line with the AMAN's goals.

The 17 global goals adopted by the UN in 2015 on behalf of the 2030 SDGs seek to eradicate poverty, reduce inequality, build more peaceful and prosperous societies and ensure that no one is neglected or left behind. Goal 16 of the SDGs "strives to attain safe and inclusive societies for a sustainable development, grant a just judiciary to all and build effective, accountable and inclusive institutions at all levels". Four objectives in Goal 16 closely address anti-corruption issues: Objective 16.4, to significantly reduce illicit flows of funds and promote recovery of stolen assets. Objective 16.5, to eliminate corruption and bribery in all its forms. Objective 16.6, to develop effective and responsible institutions at all levels. Objective 16.10, to protect public freedoms and access to information.

Transparency International has adopted a global anti-corruption strategic plan 2021-2030 "Holding Power to Account". The theory of change for the plan is based on the fact that reaching a world free of corruption first requires holding those in power to account for the common good. This requires three prerequisite conditions as follows: Community control, shield, effective standards and regulations. It calls for a focus on values and awareness, freedoms, institutions and procedures for resource protection, stopping the flow of dirty money, ensuring political integrity, business integrity, Law enforcement and justice, expanding the civil space for accountability, build community leadership to combat corruption.

International consensus on the importance of promoting governance integrity in anti-corruption strategies

Faltering global efforts to prosecute corrupt funds and recover money looted by political corruption for a wide range of countries have imposed the importance of enhancing the integrity of governance in anti-corruption strategies. This prompted TI to develop its strategy 2021-2030 **"Holding Power to Account"**, which takes into consideration integrity of governance and makes it a priority for the coming years. This requires AMAN to review and develop priorities and approaches of its work to increase its effect on national, regional and international efforts in promoting integrity and anti-corruption. This comes as part of its contribution in achieving the international anti-corruption strategy, being a national chapter accredited by TI, and also as the Palestinian House of Expertise on corruption issues.

Part Five: Widespread corruption issues and causes related to roles of regulatory institutions; proper fortification of institutions and promoting community participation.

There are many motives and reasons behind the emergence and spread of corruption in societies, however, often the prevalence of corruption and its practices can be attributed to political reasons epitomized by a weak "political will" of those in power to combat it. Also opportunities for corruption tend to increase in countries going through a transitional phase; government's involvement in the economic market (i.e., mating between capital and power); places with a weak rule of law; weak judiciary, weak regulatory bodies and or lack of independence, and in countries with weak transparency systems and lack of access to information. In addition, social and economic reasons also play a role in the

widespread of corruption as in communities that tolerate corruption, or where CSOs role is weak in public life; low wages and relatively high standard of living. All of the above can be "blamed" for the widespread of corruption acts.

In Palestine, most of the above reasons exist and contribute, even if in varying forms and degrees, to the spread and manifestation of corruption in one way or another, the most prominent of which are as follows:

1. *The effectiveness and independence of the regulatory and anti-corruption institutions remain limited*
   Incomplete system of legislation and procedures that prevent impunity.
   Lack of qualified and motivated cadres working independently in oversight and anti-corruption institutions.
   The limited regulatory role of media of the management of public funds and public affairs.
   Lack of regional and international coordination in preventing impunity and recovering looted funds and assets.

   Official public control over performance, management of public funds and affairs as well as anti-corruption activities is entrusted to a number of regulatory agencies, bodies and units in accordance with the Palestinian law and organizational structures of (the Palestinian Legislative Council (PLC), judiciary authority, ACC, public prosecution, State Audit and Administrative Control Bureau (SAACB), The General Personnel Council (GPC), internal oversight units and financial audit and inspection services, complaint units, PICHR-Ombudsman). Unfortunately, these institutions are similar in their organizational and administrative situation in terms of lack of human and financial resources, weakness in transparency of measures and procedures to carry out their duties efficiently and effectively. This is in addition to the weak oversight role of CSOs.

   The Palestinian Legislative Council (PLC): The PLC is the official body in Palestine tasked with oversight and accountability duties of the executive branch (the government and its institutions) and in drafting of legislations. However, due to the exceptional political situation in Palestine resulting from the internal division and the dissolution of the PLC in 2018, which was dysfunctional for 12 consecutive years prior to that, the PA president (since 2007, immediately after the political division of Fateh and Hamas) took it upon himself to pass laws by decision on behalf of the Council in accordance with Article 43 of the Amended Basic Law. At the same time, the Hamas bloc in the GS Council took on that role of passing laws that apply in Strip, hence the legislative reality in both parts of the country (WB&GS) is a distorted one.

   The Anti-Corruption Commission (ACC): the ACC was established under the provisions of Article 3 of the Anti-Corruption Law No. 1 of 2005, as an independent Commission, both financially and administratively. The Commission was granted the relevant competences and powers that can enable it to carry out its tasks and duties in terms of combating corruption without any undue influence. It is supported by the Public Prosecutor's Office and the Corruption Crimes Court. Article 3 of the amended Anti-Corruption Law of 2005 stipulates that the ACC enjoys a legal personality as well as financial and administrative independence. Article 7 of the Anti-Corruption Law states that the head and staff of the Commission shall have immunity for all work related tasks and duties. However, the law does not contain a provision of the PLC's approval of

appointing the head of the ACC. The Commission has sufficient power to hire its employees, but it remains understaffed due to the limited finances available. Despite the ACC's declaration that its decisions are independent of interference from any external party, it acknowledges that it is subject to internal control by its president and external control by the SAACB. In addition there are signs[10] of additional outside interventions. The ACC submits its reports to the PA president and prime minister.

Within this context, the opinion poll conducted by AMAN in 2020 indicates that approximately 77% of citizens in the WB believe that the Commission lacks independence in carrying out its role, which is 7 points higher than last year's results of (70%). The rate is higher among males than females with 80% and 73% respectively, and 79% among the youth under 30 years of age. It is also higher among CSOs employees than those working in the private sector with 85% and 83% respectively, and 78% for those working in the public sector. As for outside parties interfering in the work of the commission, **37% of citizens considered the president's office to be the most intrusive, followed by the Prime Minister and ministers with 24%, and the security services with 23%; party leaders (9%) and governors and mayors (8%)**.

In 2012, the head of the Commission was replaced without clear reasons for the change. However, this change resulted in a positive outcome with the ACC becoming more cooperative with AMAN where a memorandum of understanding and cooperation (MOU) was signed. In addition, AMAN was able to significantly participate in the preparation of the national cross-sectoral strategy and its national team tasked with oversight and implementation of the strategy, not to mention the joint work and cooperation in many areas.

The Judiciary Authority and Prosecution: The Palestinian justice sector, in particular the High Court of Justice, is a tool for controlling administrative decisions issued by the executive branch. The Prosecutor's Inspectorate was formed in 2017, though its effectiveness remains unclear. In practice, the Public Prosecutor's Office's reference body also remains uncertain on whether it is the judiciary, the PA President or his office or the executive authority, which of course affects the nature and legal reference of this body. Moreover, there are no restrictions on appointments post-leaving law enforcement institutions. Also there is no information or guidelines concerning conflict of interest issues and or gift giving and receiving, nor are there adopted policies for promoting integrity. In addition, laws by decision that were passed at the end of 2020 relating to the judiciary and the administrative court increased the dominance of the executive over the judiciary. This was exemplified by giving the executive branch the power to appoint the president of the Supreme Administrative Court.

The State Audit and Administrative Control Bureau (SAACB): The State Audit and Administrative Control Bureau Law of 2003 stipulates that it is not permissible to interfere in the work of the bureau and obliges all those subject to its supervision to respond and cooperate fully to its demands. The Law also stipulates that: the Bureau's purpose to ensure the integrity of work and the financial and administrative stability of the PA with its three powers, executive, legislative and judicial. It also aims to expose all financial and administrative deviations and or violations

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10   Coalition for Integrity and Accountability AMAN, Integrity and Anti-Corruption Reality Report 2016, Ramallah, 2018, p. 37

including cases of exploitation in public positions, and ensure that public performance is consistent with the provisions of laws, regulations, resolutions and instructions in force and that they are applied effectively and efficiently. However, despite the abovementioned, intrusions and attempts to undermine its independence by the executive branch have been previously noted such as, the removal of the former head of the Bureau, which is in violation of the law. This illustrates the fragility of such a position due to lack immunity and of the possibility of it being repeated at any time.

> **Specific issues of the Bureau**
> - Lack of qualified human resources.
> - Delay in publication of reports; refrains from publishing some reports despite their importance.
> - Interference attempts by the executive authority in the Bureau's decisions and work hence not respecting its independence.

In practice, the SAACB implements oversight tasks on all administrative bodies under its control through: on-sight exploratory visits, guiding and or supervisory visits, attending bids sessions as a supervisory body, follow-up on general complaints and negligence related press investigations published by media such as: recklessness, poor management, or exploitation. The Bureau publishes its annual reports and some quarterly reports on its website.

Internal Oversight Units and Financial Audit and Inspection Departments: In 2010, the Council of Ministers issued a financial system for ministries and public institutions. The Council also issued the Decision No. 130 of 2006, which provides for the development of internal control units in ministries to: control the expenses of departments regardless of the funding source, the public budget or grants; ensure accuracy of monthly revenues and expenditures; ensure validity of revenue refunds; ensure participation in the evaluation of grants and in-kind assistance; coordination with the financial departments in the various responsibility centers to follow up on the observations of the SAACB and responses to its inquiries.

During 2018, a final draft of the specific financial system[11] for ministries and public institutions was discussed in the Council of Ministers. However, it is worth noting that the mentioned draft was prepared in 2014 but was not approved until the date of this strategy. Article 134 of the system stipulated that: "a specialized department is established within the public institution under the jurisdiction of the related competent minister. The department is required to perform its functions in accordance with the internal financial audit system set up by the Ministry to develop the public structure and framework of the internal control system in the public sector, which ensures the appropriate and economic use of public resources. It also ensures that all public institutions and units are committed to spending according to the applicable financial legislation.[12]

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[11] It should be noted that this system has not yet been published in the Official newspaper and is applied on the basis of instructions from the Minister of Finance.
[12] The 2018 financial system project for ministries and public institutions is unpublished.

The General Personnel Council (GPC): the GPC is in charge of regulating civil service procedures according to provisions stated in the Civil Service Law of 1998. The Council serves as the technical and implementing body of policies and regulations approved by the Council of Ministers, in that it: regulates employment and develops the detailed procedures for implementation; monitors government agencies in applying systems, regulations and decisions of personnel affairs in the various specialized areas and provides recommendations on the development of the service.

The Council faces challenges on the ground concerning the appointment of special contracts employment and senior civil servants. This is due to the lack professionalism and impartiality in the execution of these posts, hence showing no respect for the principles of equal opportunities and merit for these positions.

Complaint Units: On October 13, 2003 the Council of Ministers decided to establish the complaints bureau. However, this decision was not activated at the level of government and ministries until the Council of Ministers issued the complaints department's system in the Council and ministries on May 3, 2005 in accordance with Decision No. 60 of 2005, which was amended on March 8, 2009 to become Complaints System No. 6 of 2009. This system continued to be amended until 2016. Although a central department was set up in the Council of Ministers as well as units in most government institutions, the management process of these complaints remained traditional. This is shown in the annual reports where complaints are mentioned as statistics without description of the complaints: nature, methods of addressing them, extent of satisfaction of complainants of solutions and or weak areas that need to be addressed in order to avoid repetition of similar complaints etc. It is important not to lose sight that the main purpose of the existence of a unified government complaint system is to facilitate the oversight process and methods of management by the various institutions and to come up with conclusions in its regard. Sincere assessment of complaints lies in the extent to which citizens' complaints are taken seriously as in studying each case and addressing it properly before closing the file and merely reporting it as number that is classified "addressed or not addressed".

The Independent Human Rights Commission-Ombudsman: The IHRC was established by a decree issued by the late President Yasser Arafat on 30 September 1994. The decision was published in the official newspaper under no. 59 of 1995. In accordance with this decision, the Commission's tasks and responsibilities were defined. The tasks basically encompassed the follow up and protection of human rights including maintenance of the requirements of these rights in the various Palestinian laws, legislation and regulations as well as in the daily work of the various departments, and services and institutions of the state of Palestine and the Palestine Liberation Organization (PLO). The Decision allowed room for the Commission to define its own internal regulations that would ensure its effectiveness and independence. Although the Commission began its activities in 1994 based on the above decree, in 2003 upon the enactment of the amended Basic Law of that year, article 31 of Law stated that: "the Commission is to be established by law as an independent human rights body where its composition, functions and competence are defined by the law. The Commission will submit its reports to both the PA President and to the PLC." Throughout its years of operation, the Commission shall operate fairly and impartially, and stand at an equal distance from all civil and security institutions in the GS. It will also be the key reference for legal and human rights issues for official institutions in addition to providing advice through legal memorandums to the president and the Prime Minister's offices.

The Commission is required to review and amend draft laws (bills) in line with the international agreements ratified by Palestine. As mentioned, it is also required to prepare and submit an annual report on the status of human rights in Palestine to the President, Prime minister and PLC as well as to publish these reports on the Commission's website and provide hard copies for the public.

2. *The internal environment in service provision institutions is not immune to corruption*

Inadequate policies of the transparency principles that are mandatory to adopting the values of integrity and accountability
Shortcomings in the role of relevant regulating bodies, namely: the GPC, internal control units, the financial audit and inspection services and the SAACB
Limited social and media roles in holding service institutions accountable

Public services are provided to Palestinian citizens by a range of government institutions, public institutions, shareholding companies, LGUs and private companies in addition to the UNRWA affiliated institutions. While regulating the public services sector, regardless of the service provider, is the responsibility of the Palestinian government represented by a ministry, commission or formal institution. This also applies to health and medical services, education, social services, employment, electricity, water, roads, communication, waste disposal and sanitation services.

In the first quarter of 2021, the Palestinian government launched a national development plan: "Resilience, Disengagement and Cluster Development towards Independence". The Plan was based on 40 other sectoral and development strategies with clusters documents, as well as our perspective on development, hence making development a lever for national liberation. The development plan is based on a national vision that recognizes the Palestinian people's right to self-determination and sovereignty and that Israel is a colonizer. The Plan also stipulates that the envisioned Palestinian state is based on a relationship between the voter and the elected to make Palestine a democratic state in which fundamental rights and public freedoms are respected. Also that democratic Palestine must be free of all forms of racial discrimination that are based on religion, race or gender. Its public officials and employees must be highly qualified in the various fields of public positions and employment and must remain far from monopoly, domination and nepotism. The plan also identified a range of public policies supporting national efforts to promote integrity and combating corruption, including:

Public Policy (4) restored democratic energy to Palestine by identifying a range of relevant policy interventions, including: a review of the constitutional framework governing the state so that the constitutional text is in line with international contractual and customary obligations; organizing democratic and periodic elections at all levels and safeguarding and protecting public rights and freedoms. A range of policies have also identified several relevant policy interventions, including Policy (7): strengthening responses of LGUs to citizens; Policy (8) upgrading the level of public services provided to citizens; Policy (11) enhancing the efficiency of public institutions; Policy (12)

efficiency and effectiveness in managing available resources, particularly policy intervention, also strengthening the public procurement system to ensure transparency and accountability. In addition, **Policy (10) identified** the importance of **promoting integrity, accountability, transparency and combating corruption** in all of the government's work as well as ensuring access to information and strengthening the role of financial and administrative regulatory institutions.

Accordingly, sectoral plans to improve the quality of services provided by each sector require operational plans on the one hand and suitable budgets on the other hand. This is necessary in order to avoid repetition of non-compliance, as happened in many previous sectoral and cross-sector plans due to insufficient budgets and weak control, evaluation and follow-up systems.

With regard to the integrity of those working in public service institutions in particular, the GPC in cooperation with the ACC have achieved remarkable progress in adopting the rules, principles and values of the Code of Conduct for Public Servants. However, the reports revealed two major challenges to achieve full success. First is to better activate the system for promoting the application of the code, and second is to improve control over compliance with its rules and values.

The Corona pandemic revealed other challenges in basic public services provision, including a health-care system that lacks a comprehensive and transparent health insurance system that delivers justice and social solidarity towards better health service and care than the present one.

Moreover, the social services sector continues to suffers from the lack of compliance of all parties in providing humanitarian assistance, whether in kind or cash, through the Unified Portal for Social Assistance, which the Ministry of Social Development MoSD) has worked hard to prepare, develop and activate this Portal.

On another note, the relationship between the private sector and public sector play a significant role in weakening or strengthening the immunity of the NIS, especially with companies that provide public services such as water, electricity, communications and transportation. As it stands, this sector needs to adopt and apply the Code of Corporate Governance in the private sector and to contribute to combating corruption as part of its social responsibility. It must also repair its weak system concerning conflicts of interest between public sector employees and their relationship with the private sector.

3. **Fragility of the regulatory status and governance in local government units (LGU)**

Limited community and vertical accountability of the LGUs
Weak complaints systems; weak internal control units
Limited knowledge of internal administrative, financial and supervisory practices and of material means and resources
Infiltrations of the clan and family culture in the management of LGUs

Cases and complaints received by the official and community regulatory institutions and bodies are confirmed by results of AMAN's NIS studies and the LGUs Integrity Index for the past three

years, which indicate that this sector continues to be a soft spot hindering the anti-corruption efforts.

> Weaknesses in the regulatory structure of LGUs
> - Lack of approved policies for publication and disclosure
> - Absence of internal control in the majority of LGUs
> - Fragility of organizational structures and human resource management
> - Interference of political parties and clans in the management of LGUs
> - Lack of compliance with the procurement system in some LGUs
> - Weak oversight role of the LGUs boards in facing the heads of LGUs

From a regulatory point of view, there is a significant shortage of knowledge among the various local bodies in the integrity and anti-corruption system, especially in regard to administrative, financial and internal oversight practices. This is accompanied by the SAACB's poor material and human resources in controlling this vast sector. On the other hand, from a social and cultural perspective, the tribal and family culture interferes in the managements of these bodies accompanied by poor accountability, whether community or vertical. Perhaps one of the most prominent challenges that need to be addressed by LGUs is the activation of complaint systems and internal control units, which will assist them in carrying out their responsibilities and tasks related to the control of financial and administrative performance and strengthen the accountability role of their boards to face heads of councils.

4. *Weak business integrity environment, especially in "the Private sector" shareholding companies that manage public services*

Failure of current legislation to criminalize certain forms of corruption in the business sector.
Inadequate regulations and policies governing the relationship between the business sector and relevant official institution.
Weakness of all forms of official, popular and media control over the business sector, including representative bodies of the sector.

The UNCAC emphasized the role of the private sector in anti-corruption efforts and its significance in strengthening good governance rules in private sector companies at the state level. The covenant also listed a range of measures to be taken by the private sector to immunize the business environment from risks of corruption. It is worth noting that Palestine officially signed the covenant and committed to implementing its provisions.

> **Representative institutions of the Palestinian private sector: candidates for partnership in anti-corruption efforts**
>
> Pal trade, Capital Market Authority, Governance Institute, Union of Banking Associations, Financial Auditors Union,

Insurance Companies Federation, Federation of Industries, the Chambers of Commerce Federation.

The failure of current legislation to address forms of corruption in the business sector is reflected in the Anti-Corruption Law of 2010, which does not include provisions to criminalize bribery and embezzlement in the private sector unless the other party is from the public sector and is involved in the crime. It is also reflected in the weak rules, regulations and procedures governing the relationship between the private and public sectors, which is especially crucial with regard to freedom allowed for senior public and private sector incumbents to take on positions in both sectors, hence the possibility for conflicts of interest arising is increased.

Furthermore, the absence of many laws and regulations constitutes a legislative vacuum that impacts the environment of integrity, transparency and accountability in the private sector. Legislations such as: the Competition Promotion and Antitrust Law; the Concession Law on granting privileges for the management and operations of vital service facilities privatized or otherwise; the Debt Settlement Act; and a specific and up-to date corporate law. This is essential for such a sector that is more vulnerable to corruption, especially those arising from possible conflicts of interest opportunities and from granting privileges and tenders.

5. *Limited CSOs efforts to reduce corruption and strengthen the NIS in the various sectors*

Weakness of the integrity and anti-corruption system in many CSOs, with some being accused of suspicions of corruption.
Lack of technical, financial and administrative readiness of CSOs to work on anti-corruption issues in the target sectors.

The number of NGOs doubled since the establishment of the PA reaching 3273 at the present time, with approximately 800 of them in the Gaza Strip. These institutions assumed many responsibilities and have taken on new tasks and roles such as the oversight of PA institutions, and diligently worked to establish professional, democratic and pluralistic rules. They also worked to impact the various Palestinian legislative, economic and other policies, in addition to engaging in complementary and contradicting relationships with the PA due to its policies on the one hand, and struggling to deal with the Israeli occupation on the other hand.

Civil society organizations operate within a reasonable space provided by the Charitable and Non-Governmental Organizations Law of 2000 to play their part in advocating rights or criticizing the government. The allowed space is determined by the overall political situation and weakness of the accountability system in Palestine, as well as by the dominance of the executive over the rest of the authorities. Furthermore, the Law by Decision No. 7 to amend the abovementioned law was an attempt to restrict the work of these organizations, in addition to the many actions and practices by the executive branch, including the security institution, to narrow NGOs freedom of operation such as: withholding information and boycotting NGO activities; restrictions on banks'

transactions (transferring and receiving funds), and attempts to discredit many institutions by accusing them of working against the national interest and or for foreign agendas.

Moreover, many NGOs suffer from the ineffectiveness of their general assemblies and boards of directors, which leaves their executive managements in control of all affairs including determining their public policies without effective oversight by their governing bodies. In addition, NGOs' commitment to the specific code of conduct remains weak. Also efforts of CSOs to strengthen the integrity system at work is still modest. This requires that NGOs become more dependent on their own voluntary self-organization in terms of strengthening internal accountability mechanisms to hold officials of these institutions accountable. As applies to all bodies that manage public affairs and provide services to the public, NGOs must also submit periodic reports on the tasks assigned to them and justify and clarify their decisions. This is in order to establish the concept of good governance based on a system of values, principles, standards and foundations agreed upon in the specific CSOs Code of Conduct. On the other hand, CSOs have succeeded in pressuring the government to take positive policy steps following various campaigns and activities in addition to contributing to reform efforts and initiatives.

It is well known that corruption has its negative effects on sectors directly and indirectly and specifically on target groups in which NGOs operate, such as the right to education and health, youth, the media, the disabled, farmers, women and others. Thus, each NGO, without going beyond the limits of its specialized field, can contribute to reducing the impact of corruption in the field in which it operates by including the accountability system and its tools in its programs to control the integrity and transparency of public sector performance in the same field as its own. NGOs can also promote the culture of community accountability, raise awareness of the effects of corruption and means of reporting it among their targeted groups in addition to promoting the importance of social accountability as it relates to their rights.

6. *Limited role for Palestinian media in censorship and in strengthening the NIS*

Shortcomings within the current legislation in dealing with some media, free access to information and protection of media professionals
The stringent censorship by the security establishment and control of political parties and businessmen on some media limits professionalism
Investigative journalism concerning corruption remains limited

The existing legislations grant pluralism in the media and access to it by the private sector and CSOs. However, no law has been passed on the protection of the media and its personnel or on free access to information, in addition to the absence of laws regulating audiovisual media and websites. Moreover, the current defamation laws are harsh and the imposed penalties consisting of "imprisonment" and a financial fines deprive people of their freedom.

| Classification of media outlets in Palestine |

> 1. Government media (Voice of Palestine, Palestine TV, Al-Hayyat Newspaper, Palestinian News Agency "WAFA".
> 2. Private media (TV, radio, private newspapers, and online press sites).
> 3. Factional media (Satellite channels, magazines and websites affiliated with political organizations)

This limits freedom of expression because of generalization of legal texts, hence allowing the ruling authorities to expand interpretations to suit their purpose (i.e., use it against journalists and other media professionals) the last of which was the Cybercrime Law. Harassment and intimidation of journalists are considered limited, but increases in times of internal clashes caused by the internal political division. Regardless, failure to investigate violations against journalists and media organizations by the relevant authorities is absolutely clear. However, there are times when journalists are held accountable for information they publish and at the same time are unable to assert their right to freedom of expression.

This reality played a role in weakening the media role to actively seek and write investigative reports related to detection and exposure of corruption acts. Therefore, it is vital to pressure for the approval of the Right to Access Information Law, in addition to supporting media professionals to work on corruption-related investigations, radio and television programs as well as written articles related to social accountability.

7. Poor transparency and accountability of public fund management

The absence of the PLC as the legally authorized body for accountability of public spending through the final account has led to weakness in the management and accountability of public funds concerning the misuse and mismanagement of this money. In addition, weakness in transparency in providing information related to public funds' management and in the preparation and implementation of the public budget by the Ministry of Finance (MoF) is a major contributor to weakening the accountability system, and allows for possibilities of wasting public funds. Therefore, the absence of accountability, review and auditing of state institutions consequently led to the disruption and subsequent dissolution of the Legislative Council.

8. Poor transparency and access to information system

The government's weak policy of openness to the public contributed to a weak transparency and access to information system, and specifically in the lack of issuing of the Right to Access information Law. Factors such as the absence of transparency, lack of access to public information, the government's adoption of a single policy management of public affairs and the absence of the participatory approach, led to a weak accountability system and assured the corrupt that their actions will go unpunished.

9. *A corruption tolerating culture*

Many factors and social relations and norms in Palestine led to the inability of citizens to challenge the government's actions through the use of the complaints system concerning corruption issues. Some of these factors include **lack of awareness of**: the importance of protecting public funds; awareness of the importance of reporting corruption acts; awareness of the nature, forms and risks of corruption and lack of knowledge of the mechanisms and administrative systems by which power is exercised. Additional factors include renouncing nepotism and wasta, weak democratic awareness and weak awareness of citizens' rights.

10. *Weak integrity of government and weak rule of law*

The year 2020 witnessed a number of challenges associated with the growing manifestations of political corruption or lack of integrity of governance including: postponement of the general elections that were scheduled for May 2021, which provided an opportunity to rebalance the three powers of government (executive, legislative, judicial) and promote the principle of peaceful transfer of power in Palestine, which eroded during the last decade due to the internal division in 2007. On the one hand, this weakened the principle of mutual control between the three mentioned powers, which strengthened the dominance of the executive over the legislative and judicial powers in the WB and GS, and negatively impacted the integrity of governance and added to citizens' lack of confidence and trust in both authorities. And on the other hand, it hindered anti-corruption efforts and left the executive authority without real oversight and accountability in the areas of public administration and public funds' management. Moreover, appointments to senior and special contract posts continued without respect for the principle of equal opportunities and without posting job advertisements and or conducting competitions, as well as without an official oversight body to ensure the integrity and transparency of the recruitment procedures in both the WB and GS.

Any governance with integrity is based on a balanced separation of the three powers of the political system (executive, legislative and judicial). This balance encompasses applying mutual control between them, while each branch enjoys relative independence from the other two. In addition, it includes clear procedures for cooperation and integration in the management of public affairs that prevents any authority from retaining absolute tasks and powers in the political system (i.e., to prevent a monopoly of power). The clarity of the constitutional and legal rules adopted for the role of each of the three authorities is an essential element in providing transparency. In that it determines the area of accountability for each of them within the political system. It also promotes commitment of officials and employees, of each branch, to the values of good conduct in order to shield the ruling system from corruption. Furthermore it obliges officials to make decisions and actions for the purposes of the common good and any official is held accountable for the power granted to him/her by law and by the right of CSOs and free media to community accountability. These basic principles prohibit any official from exercising his/her authority upon passing legislation, adopting policies, making decisions or taking actions or measures for any purpose other than for the public's interest. These principles also do not allow

anyone to use the power granted to appoint loyalists (people of confidence) in public positions in the State.

11. *The continued state of emergency strengthened centralization of power at the expense of the public rights and freedoms and weakened regulatory institutions' independence*

In 2020 and 2021, decisions were made in the interest of influential members of the executive branch, including official regulatory institutions at the expense of merit and efficiency. This further weakened citizens' confidence in officials of key public institutions, in both the WB and GS; hampered anti-corruption efforts, first and foremost, accountability of the corrupt, and kept the executive branch without real oversight and accountability in the areas of public administration and public funds management. Moreover, the coronavirus pandemic further contributed to: reinforcing an environment that allows for a greater concentration of power in the hands of the executive authority; further decline in transparency of public finance management and government's openness to CSOs; the infringement on the independence and role of regulatory bodies by appointing loyalists or confidants to its leadership, contrary to the principles of good governance. All of the above raises a red flag calling for new solutions to be found in addition to enhancing governance integrity through new standards and controls.

The most prominent manifestations of corruption in the Palestinian society as illustrated in AMAN's 2021 reports

1- Poor integrity of governance (political corruption): not only is it a direct violation of the principle of the rule of law and an exploitation of powers granted by law, but rather that the law itself is used to protect and promote acts of corruption instead of confronting them. This is done by abusing the exceptional powers granted by the Basic Law through exploitation of the broad introduction which includes some provisions that allow the use of the law to promote personal interests and gains and violate the principle of integrity in governance.

2- Wasta, Nepotism and favoritism: It remains one of the most widespread manifestations of corruption due to poor awareness of some groups in society who consider wasta and nepotism are positive values. In their view, using wasta is perceived as an expression of authenticity of the official's affiliation to family, party or region and not as a corruption crime that violates the principles of fairness and equal opportunity.

3- Non-disclosure of conflicts of interest: the amended Palestinian Anti-Corruption Law of 2018, stipulates that failure to disclose conflict of interest in cases required by law is a corruption crime. However, and despite the issuance of the conflict of interest
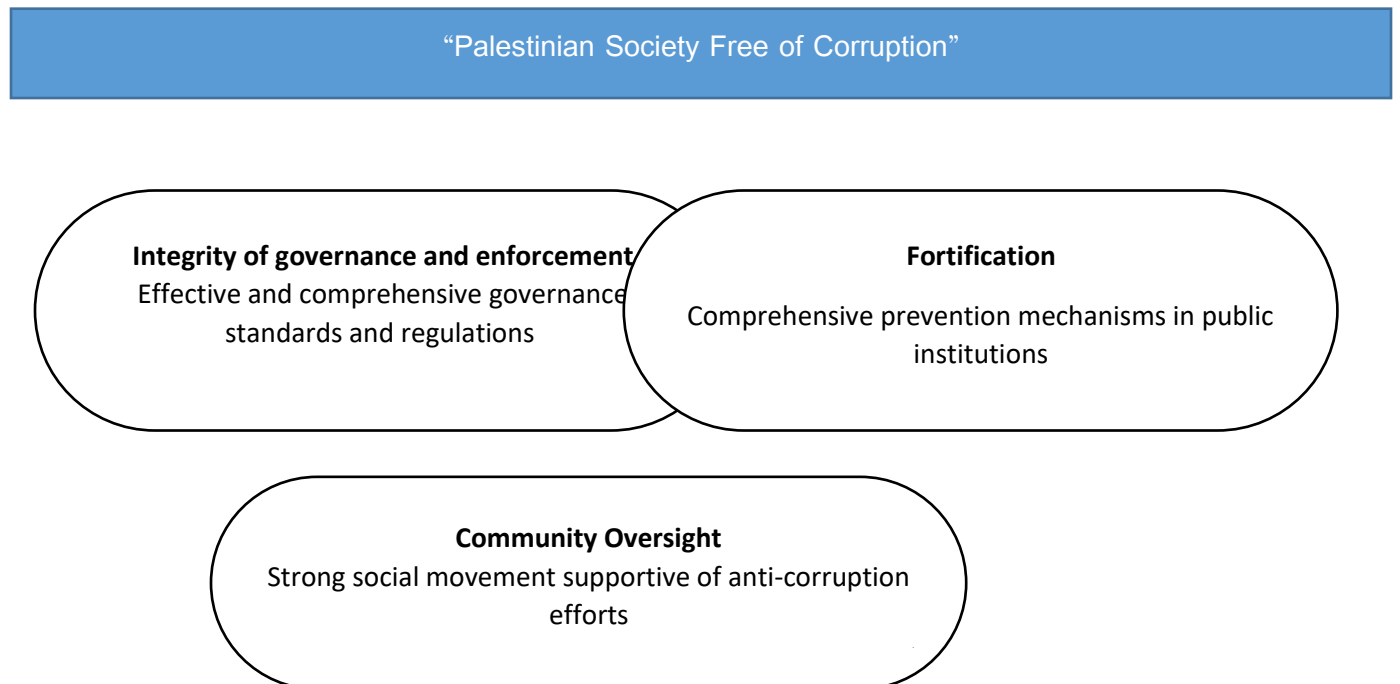
> prevention system in 2020, this concept remains vague and hence needs specific and clear instructions to guide institutions and identify cases considered to be conflict of interest in addition to illustrating methods of disclosing and avoiding such cases in any given institution.
>
> 4- Influence peddling: Undue influence peddling or "trade in influence" is an act that was recently criminalized in Palestine under amendments of the Anti-Corruption Law in compliance with the UNCAC. What is intended by the term is when a public official or anyone under his authority uses his position and influence to obtain undue privileges. Influence peddling is a popular practice in Palestine. One example is when an official exploits his relationships and career influence to obtain customs exemptions that he does not legally deserve.

Part six: Core program: AMAN and Partners work priorities

6.1 The theory of change is a general framework for medium and long-term change

We and our partners believe that to eliminate corruption and its forms, petty and grand, requires the work and efforts of all in society. This is crucial in order to influence decision-makers to build an integrity system where all activists, CSOs, political parties, unions, researchers, and influencers of public opinion and interest groups can participate in its making, as part of a national program to rally and mobilize efforts to promote accountability and integrity of governance. The changing premise of AMAN's 2023-2025 Strategy is based on the fact that reaching a corruption-free Palestinian society requires achieving three preconditions that intersect and cannot be worked on separately: integrity of governance and enforcement; fortification of institutions; community oversight, as illustrated below:

"Palestinian Society Free of Corruption"

Integrity of governance and enforcement
Effective and comprehensive governance standards and regulations

Fortification
Comprehensive prevention mechanisms in public institutions

Community Oversight
Strong social movement supportive of anti-corruption efforts

We and our partners believe that the way to achieve integrity in governance and enforcement of legislations related to combating corruption and fortification of public institutions as well as effectiveness of community oversight requires the full comprehension and awareness of the public of corruption and its causes and methods of combating it. The public also needs to be knowledgeable concerning the protection of freedoms, building an institution-based state founded on the rule of law, reforming public institutions, governance of private sector institutions, and effectiveness of civil society institutions.

We and our partners believe that community oversight is based mainly on activating the participating role of CSOs and media in holding official institutions accountable and raising awareness of citizens to enhance their participation in anti-corruption efforts. All of this requires that all those concerned must have access to information and its utilization. Also required is a political will that adopts a track towards strengthening the integrity of governance and fortification of public institutions in accordance with the national vision of combating corruption and the national policy vision of the National Development Plan.

We and our partners also believe that fortification of institutions that manage public affairs requires, in addition to effective community oversight and support of political parties and popular groups, a range of changes in the working environment of these institutions that ensure: budget transparency, management of public funds, sufficient number of relevant legislation that are enforced and measures that strengthen the system of integrity and accountability, especially services provision institutions. Moreover, these institutions must adopt a range of procedures, tools and decisions that shield employees from committing corruption crimes. To also activate and ensure independence of official oversight institutions as well as ensure that sufficient financial and human resources needed to carry out their own tasks are provided.

We and our partners also believe that to achieve integrity of governance and enforcement of higher policies requires effective community oversight and the support of political parties and popular groups work with decision makers to achieve an integrated system of transparency and integrity in appointments in senior positions of public institutions. Also to ensure access to power through fair and periodic elections and to strengthen methods of participation in decision-making and setting priorities.

We believe that: supported by a number of national and international companies and lessons learned, AMAN's current organization program, especially the operational program, organizational structure, work policies and management of human and financial resources, will achieve tangible results over the next three years. In accordance with its approach and mission, AMAN will provide objective studies and reports supported by evidence and data to be the basis for advocacy and accountability campaigns. AMAN will also work in alliance with a vast number of companies and CSOs on promoting social accountability and on improving knowledge, expertise and tool development within an integrated capacity-building program.

6.2 First track for achieving change: rallying against corruption, promoting community mobilization in support of anti-corruption efforts, and holding the authority accountable.

Change desired by AMAN "a Palestinian society free of corruption" requires that all civil society components (Citizens, media, NGOs, trade unions and federations, and political parties) exercise oversight and accountability means on the performance of public institutions as part of their civic support and participation in governance, policy-making and influence in public decisions. To achieve this, CSOs must possess knowledge, proper tools and a favorable environment in order to detect corruption and hold public officials accountable for their decisions.

AMAN, as an experienced anti-corruption house of expertise, will create and lead a mass social movement to promote integrity, combat corruption and conduct control on public performance. It will carry it out by raising awareness on corruption forms, including gender-based corruption and ways by which it is addressed. AMAN will also work to engage all civil society components in anti-corruption efforts and social accountability by providing all necessary information and tools. In addition, it will push to strengthen legal frameworks in terms of laws such as protection and access to information laws to ensure an effective participation of civil society in oversight and accountability. More focus will be placed on the youth and their involvement in responding to community demands for reform and accountability.

This objective includes several interventions that contribute to the culture of reporting corruption with focus on groups that are less powerful at the social level such as women, the youth and marginalized people. Other interventions include enhancing the role of media, education, CSOs, unions and federations, political parties and popular groups in promoting integrity, and anti-corruption by incorporating integrity and anti-corruption means in their daily work. AMAN will also work on coordinating efforts of the various community groups and empowering them to engage in combating corruption and in national and local campaigns and sectoral initiatives; and enhancing the effectiveness of our partners' participation in community accountability and oversight of the management of public affairs and funds, and oversight of governance integrity.

Our approach for rallying against corruption

1. **Raising citizens' awareness and arousing their interest** on the forms of corruption, causes and impact on the various aspects of their lives and the future of their children through

different campaigns organized by AMAN and its CSOs partners or in cooperation with various media and or educational institutions.

2. **Coordinating with and supporting NGOs, media, youth and students groups** whose work is related to community awareness, accountability and can lead coalitions to work on the integrity of governance such as (the Budget Transparency Team, the Judicial Reform Coalition and the Forum for Promoting Good Governance in the Security Services).

3. **Hosting or participating more intensely with community coalitions** to pressure decision-makers to adopt recommendations related to human rights, public rights and freedoms, justice and fairness, the rule of law, combating poverty and unemployment, and combating discrimination in its various forms etc.

4. **Inclusion of NGO work in the anti-corruption system of institutions** that work in the various development areas and sectors by raising awareness of these institutions on the intersecting relationship between anti-corruption, human rights and the SDGs in order to achieve higher returns at the level of anti-corruption, human rights and sustainable development.

5. **Periodic studies and surveys for knowledge development and localization of international best experiences and practices** as well as regional and global contributions. Also to enhance citizens' awareness of the values of integrity, principles of transparency, systems of accountability and anti-corruption. Also, participating with community groups and institutions working to set priorities and policies in the areas of health, education, social protection and those working in areas related to the causes and impact of corruption and in motivating citizens to report corruption.

Mobilizing against corruption: our interventions and programs

1. Provide legal guidance to victims and whistleblowers.
2. Conduct awareness campaigns on forms of corruption including gender-based corruption and ways to combat it.
3. Develop tools and mechanisms to enhance citizens' involvement in social accountability.
4. Include the integrity and anti-corruption system in the work of NGOs at the institutional and programmatic levels.
5. Support community accountability initiatives in partnership with the implementing CSOs.
6. Strengthen and restore the establishment of national coalitions in order to hold officials accountable concerning public performance and management of public funds and to establish the right to information.
7. Strengthen the media capacity-building program on investigative surveys and accountability programs related to combating corruption and oversight of performance and public funds.
8. Activate the relationship with political parties, unions and popular groups and provide them with the knowledge and policies related to the management of public affairs and funds.

Second track, fortifying public institutions: strengthening the integrity, transparency, accountability, and the anti-corruption system in the management of public funds and affairs and services provision.

This objective contributes to strengthening the work of public institutions (ministerial and non-ministerial institutions, shareholding companies that provides public services and their representative bodies, LGUs and affiliated bodies etc.) by analyzing the status of integrity and combating corruption in its work. It also provides technical support to these institutions to allow them to obtain the necessary experiences and tools to strengthen the integrity system and integrate combating corruption into their work.

Moreover, this objectives includes several interventions that aim to monitor the integrity system and combat corruption at the level of specific sectors periodically. These interventions also aim to develop proposed solutions and provide policy advice in the management of the various vital sectors including management of the public budget and the security and justice sector... etc.

Our approach to fortifying public institutions

1. Provide technical support and backing to analyze work environments including the status of the integrity and anti-corruption system in public institutions, LGUs, the business sector.
2. Provide technical support and backing to local and national initiatives and coalitions aimed at holding official, local and civil institutions accountable in terms of service delivery, organizational work, realizing strategies, transparency of budgets and procurements.
3. Monitor transparency of the public budget and prevent waste and or abuse of public funds.
4. Monitor the integrity and combating corruption system at the national level and sectoral levels periodically; develop proposed solutions and provide policy advice.

Our interventions and programs to fortify public institutions

1. Prepare diagnostic reports and surveys on the integrity and anti-corruption system on service provision by public institutions, LGUs and the private sector.
2. Activate partnerships and relationships with CSOs and local initiatives towards holding public institutions accountable and adopting recommendations.
3. Provide technical support to employees of public institutions and LGUs to strengthen anti-corruption measures and procedures.
4. Provide technical support for representative bodies of LGUs and the private sector to help them integrate the integrity and anti-corruption indicators for oversight of LGUs and public institutions that provide services.
5. Implement a national program led by AMAN and partners to adopt and implement policies related to management of the public budget, state resources and the implementation of the sectoral and cross-sectoral strategies under the National Development Plan 2021-2023.

Third track, integrity of governance and enforcement: promoting integrity of the governance system and holding the political class accountable concerning their decisions for public interest.

Through this objective AMAN aims to contribute to the strengthening of integrity in governance in Palestine. As indicated in international studies and reports by the UN, TI and AMAN's reports, the biggest challenge hindering anti-corruption efforts in the Arab world as a whole and Palestine in particular is lack of integrity of governance. In this regard, the most prominent manifestation are the control of decision-making positions in key institutions (legislative, judicial and executive) by the executive parties or the ruling elites, in addition to abuse of power for personal, political or partisan interest.

Therefore, AMAN will seek to develop the concepts and knowledge associated with the integrity of governance through this objective by coordinating the efforts of CSOs, especially those working in the field of governance, democracy and human rights. AMAN will also examine challenges, legal policies and institutional gaps that weaken the integrity of governance by allowing the ruling authority to monopolize public decisions to strengthen its control, and hence preventing other parties of the community to participate in political decision-making. In addition, AMAN will review laws that regulate the relationship between citizens and the state, and will present proposals that contribute to the development of the legislative and institutional environment of official regulatory institutions in order to strengthen their oversight role. AMAN will also work to strengthen anti-corruption and oversight legislation and its enforcement to ensure that corrupt people are held accountable and are prevented from impunity.

The process of daily monitoring will be reinforced by AMAN monitoring Unit on every case or action that contradicts the integrity of governance. In addition, AMAN will raise these issue/s, mobilize and arm the diverse community groups at the national level for oversight and accountability.

Our approach to promoting and enforcing integrity of governance

1. Expand our joint work through networking with CSOs especially those working in the field of democracy, human rights, the rule of law and good governance to promote partnership and dialogue and widen the scope of participating CSOs in developing concepts, indicators and standards of the integrity of governance to impact the governing system. This step stems from the close and intersecting relationship between the integrity of governance and the fields mentioned in addition to the fact that lack of integrity of governance hinders the efforts of these institutions in achieving their objectives.
2. Develop AMAN's studies and reports' methodologies to include analysis of the reality and indicators of governance integrity; "Integrity of access to high government and other senior positions in the state, transparency of decision-making and formal accountability" and impunity.
3. Promote community participation, transparency and measures to prevent conflict of interest in public decision-making.
4. Host and support interventions of national community coalitions to control the effectiveness and independence of the justice sector, regulatory institutions, law enforcement institutions, in addition to supporting national efforts to achieve goal 16 of the SDGs-2030.
5. Adopt measures in support of efforts to detect corruption and prevent impunity by regulatory and law enforcement institutions.

Our interventions and programs to enhance and enforce the integrity of governance

1. Provide reliable information to increase knowledge on the reality and indicators of the integrity of governance to include: integrity in accessing positions of government and senior positions in the state, transparency in governance, preventing conflict of interest in decision-making, holding the political power to account and to horizontal oversight including community oversight by CSOs and the media, and preventing impunity.
2. Present to relevant parties proposals to address the shortcomings of the Palestinian legislation that hinder the integrity of governance.
3. Provide technical and organizational support for existing national coalitions. Also provide an initiative to establish national coalitions from CSOs to promote the integrity of governance with its three components: access to power through periodic legislative and presidential elections; ensure equal opportunities and equity for seeking public office positions, and adopt the principle of transparency and merit to achieve this

4. Prepare supervisory reports on the performance and practices of the authority with its various branches to ensure transparency, avoid conflict of interest and ensure that management of the state's resources is for the public good.
5. Enabling programs are enforced, developed mechanisms and tools that contribute to strengthening the role of the regulatory institutions in monitoring public performance.

Fourth track, development and organizational capacity building-AMAN:

Develop the institutional and organizational performance capacity of AMAN to meet its mission, vision and partnership relationship at national, international and Arab levels.

This objective aims to enable AMAN to play its role as a Palestinian anti-corruption house of expertise accredited by TI. It also aims to strengthen its local, regional and international presence through anti-corruption activities and events, and in particular, to contribute to the implementation of the current strategic transformation process and to the regional and international interventions. AMAN believes that this is a must due to its distinctive presence at the regional level and its connection with TI's International Anti-Corruption Strategy (2021-2030). This is in addition to AMAN's legitimacy and leading role among institutions of the community in promoting the integrity of governance and reducing manifestations of corruption in general and political corruption in particular. And also its implementation of initiatives related to the Arab region, as well as its development of literature such as manuals, studies, reports and methodologies on corruption and anti-corruption.

AMAN will continue to improve its organizational capacity to comply with the best standards of effective governance and management in order to reach the desired results and goals. All of which is in-line with its earned reputation as the Palestinian House of Expertise, TI's accredited chapter in the region, a key partner in the preparation and implementation of TI's International Anti-Corruption Strategy (2021-2030), and the National Cross-Sectoral Strategy for Integrity and Anti- Corruption.

Within the above context, the board of directors and the executive director will work within the abovementioned strategy's framework to enhance the human and financial resources by **strengthening**: the strategic partnerships at the national and international levels; administrative, financial and various work policies; relevant tools for combating corruption and strengthening the integrity system; and documenting lessons learned from AMAN's work experience, professionally and objectively.

AMAN will also continue its efforts to reach a work environment capable of responding to changing priorities and emergency situations; enhance risk management approaches at work; develop mechanisms that ensure the integration of gender into AMAN's overall functions and interventions; and take into account the needs of persons with disabilities within the work environment guaranteeing them fair competition to jobs and facilitate their access to the two headquarters in the WB&GS.

Our approach to developing and building AMAN's organizational capacity

- Review and develop the organizational, administrative and financial structure and policies to comply with AMAN's ability to adapt and respond efficiently and effectively to emerging priorities and to the national, regional and international entitlements.
- Organize and manage dialogue platforms and exchange of ideas on developments that negatively affect the anti-corruption system, especially in areas that have not been previously addressed.
- Promote accountability, oversight and evaluation in AMAN's interventions and programs to ensure effective performance management and internal accountability.
- Develop a clear and rapid decision-making framework based on information, studies and claims presented by partners and stakeholders.
- Find mechanisms to benefit most of the Community Advocacy and Accountability Unit, social media and e-participation in identifying new areas of intervention and partnerships that can be built at this level.
- Conduct periodic review of AMAN's financial fund-raising strategy to achieve financial continuity and strengthen partnership relationships.
- Activate the capacity-building program for AMAN's staff since it is considered the national and Arab House of Expertise.

Part seven, strategic framework for results 2023-2025.

Results of the first track for change: rallying against corruption

First strategic goal: Promoting community movements in support of anti-corruption efforts and holding the authority accountable.

Result	Measurement indicators Results	Outputs
Result 1.1 Citizens are more aware and engaged in accountability concerning public institutions performance and public funds	1. Percentage increase in individuals of all groups who are willing to report suspicions of corruption without fear, and rate of their increased confidence in anti-corruption efforts provided by those concerned; number of participants in the implementation of community accountability initiatives at the local level; number of sectors and axes covered.	1.1.1 Legal guidance is provided to victims and whistleblowers.
		1.1.2 Awareness campaigns on forms of corruption (including gender-based corruption) and ways to combat it
		1.1.3 Pressure campaigns to promote protection of whistleblowers
		1.1.3 Tools and mechanisms developed to enhance citizens' involvement in community accountability
		1.1.4 Specialized educational programs to prepare individuals to become experts in the field of anti-corruption
		1.1.5 School and university students, youth and women's groups are well-informed of anti-corruption concepts and methods, and in implementing social accountability initiatives.
Result 1.2 CSOs that are competent and participating in accountability of public institutions' performance and public funds	2. Percentage of CSOs that integrated interventions related to building an integrity system & anti-corruption in their policies and activities, and contributes to the implementation of activities directly or through alliances, according to areas and sectors. 3. Number of CSOs that contribute to the allocation of activities to support national campaigns on accountability and advocacy. 4. Rate of increase in the number of CSOs partnering in anti-corruption efforts.	1.2.1 Facilitating inclusion of the integrity and anti-corruption system in the work of NGOs at the institutional and programmatic level
		1.2.2 Community accountability initiatives in partnership with CSOs are implemented.

		1.2.3 Facilitating and supporting campaigns for national coalitions and institutions in support of accountability of public institutions' performance and public funds and to achieve development goals in general and No. 16 in particular
		1.2.3 National pressure campaigns demanding the approval of the right to information

Result	Measurement indicators Results	Outputs
Result 1.3.: Palestinian media is able to monitor public institutions performance and participate in anti-corruption efforts	5. The rate of increase in audio, video and written press reports on corruption cases, categorized by the type and the subject matter of the report.	1.3.1 Technical support is provided for capacity building of media institutions to develop their strategies incorporating the concept of the integrity and anti-corruption system in their work.
		1.3.2 Technical and financial support for media institutions and journalists to prepare investigative reports and accountability programs related to anti-corruption and oversight on performance of public institutions and funds. 1.3.3 Pressure campaigns for the approval of the right to information and enforcement of the right to expression.
Result 1.4 Political parties, unions, federations, popular groups are active in combating corruption.	6. Number of political parties, unions, federations, popular groups that are active and supportive in anti-corruption efforts and participate in coalitions' campaigns. 7. Number of 1st rank officials Who have made statements or adopted activities and initiatives to promote accountability and control of public performance and funds.	1.4.1 Analytical studies on unions and federations governance 1.4.2 Provide technical facilitation and support to unions, federations and popular groups to include anti-corruptions tools in their work. 1.43 Provide accountability and oversight information concerning management of public affairs and money to political parties and popular groups

		1.4.4 Pressure campaigns to strengthen unions and federations work and governance 1.4.5 Awareness raising campaigns on internal accountability of unions and federations

Results of the second track for change: fortifying public institutions

Second strategic goal: strengthening the values of integrity, transparency, accountability, and the anti-corruption system in the management of public funds and affairs in services provision institutions.

Results:

Medium-term results (areas of change)	Measurement indicators Results	Outputs
2.1 Adopting guaranteed measures to strengthen the integrity system and combat corruption in public institutions	8. Percentage of recommendations adopted by targeted public institutions from the total recommendations presented by AMAN and partners on fortifying public institutions.	2.1.1 Analytical and investigative reports on the integrity and anti-corruption system in service provision by public institutions are prepared. 2.1.2 Analytical and investigative reports on the integrity and anti-corruption system in private companies (private sector) that manage public facilities and resources such as: petroleum by-products, cement, electricity, water etc. 2.1.3 Advocacy and pressure campaigns to adopt recommendations of the analytical studies and reports are implemented. 2.1.4 Technical support is provided to public employees to strengthen procedures and measures related to anti-corruption.
2.2 LGUs are better able to respond to community accountability and integrity of service delivery	9. the number of LGUs that adopted measures and activities related to building an integrity and anti-corruption system within its own LGU	2.3.1 Indicators and analytical studies on the integrity and anti-corruption system in a number of LGUs are developed.

	10. Percentage of recommendations adopted by the regulatory institutions related to LGUs building of an integrity and anti-corruption system within their own LGU	2.3.2 Technical support is provided to raise LGUs employees' capacity on mechanisms that promote integrity and combating corruption. 2.3.3 Technical support is provided to LGUs' representative parties to integrate integrity and anti-corruption indicators for oversight of the LGUs performance.

Medium-term results (areas of change)	Measurement indicators Results	Outputs
2.2 Relevant parties adopt practical procedures and regulations to improve management of the budget and state resources.	11. Percentage of recommendations from the total number provided… adopted by the public budget and state resources' management relevant parties to strengthen the integrity and anti-corruption system in these areas	2.2.1 Proposals for the development of policies and procedures on management of the public budget and state resources prepared and submitted to the relevant parties 2.2.2 Pressure campaigns at the national level to improve management of the public budget and natural resources on specific issues are implemented 2.2.3 Regulatory reports to examine the extent to which sectoral and cross-sectoral strategies and allocated budgets are implemented

Results of the third track for change: integrity of governance

Third strategic goal: promoting integrity of the governance system and holding the political class accountable concerning their decisions for public interest.

Medium-term results (areas of change)	Measurement indicators Results	Outputs

3.1. Ensuring fair access to governance centers (executive, legislative and judicial authorities) and other senior positions in the State	12. Number of measures taken at the highest political level that relate to promoting the integrity of access to power.	3.1.1 Specific analytical studies on the integrity of access to power and effective indicators to govern the process mentioned. 3.1.2 Proposals that address shortcomings in the Palestinian legislations impeding the integrity of access to power; prepared and submitted to the relevant parties 3.1.3 Developed mechanisms and tools that contribute to enhancing the integrity of elections and appointments to senior positions 3.1.4 Awareness programs for the political class on the concept and indicators of governance integrity and access to power are implemented 3.1.5 National lobbying campaigns to promote the integrity of access to power; implemented
3.2 Public decision-making is subject to participation, transparency and conflict-of-interest measures	13. Number of measures taken by the Palestinian Government to promote participation and transparency in public decision-making at the political, sectoral and local levels	3.2.1 Focus groups to provide proposals/recommendations on decisions issued by the governing centers are formed 3.2.2 Lobbying and advocacy campaigns to adopt decisions and policies to promote community participation in decision-making processes. 3.2.3 Pressure campaigns to adopt standards and procedures for disclosing conflicts of interest as well as financial disclosures of the political class
3.3 Adopt measures in support of efforts exerted by regulatory and law enforcement institutions to detect corruption and prevent impunity	14. Percentage of recommendations adopted by regulatory and law enforcement institutions from the total recommendations presented by AMAN and partners…	3.3.1 Analytical and evaluation studies on the effectiveness of the formal accountability, corruption detection and impunity prevention system. 3.3.2 Implemented programs and developed mechanisms and tools that contribute to strengthening the role of regulatory institutions in monitoring public performance 3.3.3 Pressure campaigns to strengthen official accountability in governance and prevent impunity

***Results of the fourth track for change: developing and b*uilding the organizational capacity of AMAN**

The fourth strategic objective, development of AMAN's institutional and organizational capacity to fulfill its mission, vision and its national, international and Arab partnerships. Medium-term results (areas of change)

Medium-term results (areas of change)	Measurement indicators Results	Outputs
4.1 AMAN has the resources, an appropriate regulatory structure and capacity to achieve its objectives sustainably	15. Mobilize 50% of the funds needed to cover all expenses required to achieve the Strategic Plan 2023-2025 by the end of the fourth quarter of 2021 16. Number of new projects and initiatives developed outside the core program which support the strategic framework for results 2023-2025	4.1.1 New strategic partnerships contribute to enhancing AMAN's financial sustainability and its core program 4.1.2 The strategy for recruiting funds and long-term resource development plans are updated periodically to keep pace with the development of the work environment 4.1.3 AMAN's organizational structure is developed to support sustainability of key jobs (Research, awareness raising, advocacy and lobbying)
	17. The number of key positions in the organizational structure that were developed and updated 18. The number of training days conducted by AMAN at the national and regional levels 19. Number and nature of regulatory policies developed and approved by AMAN's Board of Directors	4.1.4 Management, financial and regulatory policies are up-to-date and in line with international standards. 4.1.5 Qualified AMAN staff participates in regional and international anti-corruption events 4.1.6 Guide-books on enhancing the application of the result-based approach on management, oversight and evaluation is developed and approved

Medium-term results (areas of change)	Measurement indicators Results	Outputs
4.2 AMAN- House of Expertise and a source of knowledge in the field of anti-corruption and integrity systems at the regional, national and international levels.	20. Number of new tools, initiatives and knowledge gained by AMAN's staff at work 21. Number of participations, projects and regional and international lobbying activities in which AMAN participated in 22.Number of reports and working-papers prepared and published by AMAN	4.2.1 Tools and know-how developed by AMAN and its partners are documented and disseminated in Arabic 4.2.2 Regional studies and seminars to share knowledge and learning are implemented 4.2.3 Lessons learned from AMAN's interventions and change theory are circulated
4.3 AMAN's work environment is more comprehensive and responsive for emerging priorities and emergencies	23. Percentage of employees that view AMAN as an all-inclusive institution	4.3.1 AMAN's headquarters are equipped in accordance with the approved standards to ensure the rights of persons with disabilities
	24. Number of team members who have shown improvement in risk management skills. Funders who are also partners in AMAN's core program and other partners recognize the efficiency and effectiveness of the projects and core program implementation and the integration of activities between them; they also recognize the transparency of reports and information.	4.3.2 Policies and mechanisms to integrate gender into AMAN's work are developed and approved 4.3.3 Risk Management policies, plans and guide-books are developed and approved 4.3.4 The team's risk management capabilities are enhanced. 4.3.5 Periodic risk management assessment reports are prepared.
	25. Evaluation reports of the core program and projects highlight lessons learned, especially with regard to the theory of change	4.3.6 Mid- and end-of-term evaluation of initiatives and projects implemented outside the core program highlight the most important results and their connection to AMAN's strategy and lessons learned
		4.3.7 Periodic Strategic Review of AMAN's strategy is carried out.

Part eight, strategy management: administrative measures for implementing AMAN's core program

8.1 Communication and partner recruitment

To achieve the desired change in the four tracks of the strategy, AMAN's staff will enhance communication and connections with all actors, national and international partners to mobilize efforts and gain additional partners and better understandings. AMAN will assign this task to a special team dedicated to developing AMAN's approach in reaching all of the groups concerned through:

- Develop AMAN's statement at the national, Arab and international levels to be in line with the strategy's motto "Partners for integrity of governance and enhanced accountability". AMAN will make it clear that this slogan is to be considered a work program for all partners and adopting it is a prerequisite condition for making a tangible change in citizens' daily lives. It is also a key method to promote citizens' confidence and trust in government in terms of accessing services and achieving prosperity and social justice.
- Develop AMAN's work policies and approach in working with partners and coalitions with focus on civil society, media, representative private sector institutions, political parties, unions and social movements.
- Strengthen the role of applied research and knowledge to include involvement of universities and research centers to require graduate students and academics to choose and conduct research topics in which policies and proposals can be built on to enhance partners' role in strengthening the integrity and anti-corruption system.
- Engage and invest in more outreach activities with existing networks and alliances, especially in primary sectors such as health, education, services, employment and women's empowerment. And to provide the necessary technical support to the institutions active in this area in order to strengthen their roles and programs in promoting integrity and combating corruption within the competent sectors.
- Provide opportunities for partners to participate in media activities. It is also important that you give them recognition during the various public meetings. In addition, provide chances for them to participate in workshops, training courses, conferences and exchange visits abroad.

8.2 Human resource management

AMAN will continue to develop its policies to enhance knowledge, experiences and drive of its executive staff and national experts (Strategists) towards achieving the desired changes in the four tracks. In particular, AMAN will work on the following:

AMAN will continue to ensure that its staff and expert strategists attend and participate in abroad and or locally held training programs and workshops related to AMAN's priorities. Eespecially in areas of: building coalitions, organizing advocacy campaigns, management of awareness campaigns and investigative reports, in addition to areas related to the organization and management of regulatory and anti-corruption institutions, fortification of public and business institutions, and LGUs from corruption, and in areas of strengthening the concepts and tools related to the integrity of governance, as well as official and social accountability.

- Engage AMAN's staff and national strategists in research or training tasks abroad, especially in Arab countries seeking to benefit from AMAN's experience.

8.3 AMAN's public policies and measures for M&E function

The oversight, evaluation, learning and accountability job at AMAN is based on the premise that the inclusion of this job in the management of programs and projects is vital to achieving the objectives of the oversight and evaluation system. Inclusion means that the management and employees working on the programs and projects must assume that all activities of oversight and evaluation are at the heart of their work duties. Moreover, their commitment to developing and implementing the oversight and evaluation plans must be the same as their commitment in carrying out the various activities and interventions; while relying on AMAN's similar experience and best practices in this area as they implement the system mentioned. With that in mind, AMAN will adhere to the following policies and measures:

- Allocate time and tools to achieve real participation of those involved, especially coordinators and partners of each track of change. A series of meetings and consultations will be organized to review and develop special indicators and tools in each course/track of change.

- Activate the role of users of the oversight, evaluation, learning and accountability system (OELA), especially the board of directors and partners and funders of the core program in determining the objectives and outcomes of the system and in getting feedback and specifically those related to examining the theories of change, accountability and learning.

- Ensure active participation of change partners who will be subject to the change measurement index during the development and application of the system, which will be conducted through an organized process to engage them in the analysis of the status quo and in defining targets. This will be reflected in facilitating the team's mission to access the quality of information that can be credibly collected as well as provide access to the most compatible tools. Moreover, it will create consensus among everyone in the mission and facilitate information collection, especially since most of the information to be collected will be from change partners.

- It is important to remember that the (OELA) system is a live system. This means that it is subject to review and development at all times in addition to an annual review, achievement follow-up and progress update. This is carried out as part of a comprehensive knowledge management process within the institution and with partner institutions, especially change partners.

- Conduct continuous training in regard to oversight and evaluation for the staff during implementation to increase their motivation and commitment towards the adoption of the system. The training will include reviewing case-studies of experiences from chapters or institutions working in areas of strengthening the integrity system and combating corruption and on case-studies linked to an already implemented programs and projects on management and learning of developing information collection tools, quantitatively or qualitatively.

- Activate the officer's role in charge of OELA system in empowering the cadre working on the programs and projects in carrying out their tasks as best as possible in planning,

oversight and evaluation. It is also worth noting that this should be illustrated clearly in the terms of reference for all. This is vital in order to avoid overlapping of responsibilities that may interfere in the achievement of the system's objectives and tasks; that the project coordinators do not rely on the oversight and evaluation officer; that the oversight and evaluation job is not separated from the overall management of activities and functions of the programs and projects.

- The oversight and evaluation system at AMAN strives to achieve 3 key objectives: **1.** That AMAN's administrative team is able to guide its staff and its partners' on the right track to achieve the desired change. **2.** Promote accountability concerning the efficiency and effectiveness of programs and projects and ensure the organization's commitment to its vision, mission and values. **3.** Provide administrative, financial and technical reports on AMAN's overall work to all stakeholders.

- AMAN's oversight and evaluation system consists of a minimum of: **1-** Defining system users, information they need and an information flow model. **2-** An oversight and evaluation matrix for the system with a minimum of: mid-range results measurement indicators, sources and means of information collection, questions or information needed, responsibility of data collection and circulation. **3-** Policies, models and steps for sources and means of information collection (tool details). **4-** Pre and post study policies and components. **5-** Lessons-learned to focus on, specific policies for oversight and documentation and information management. **6-**Meetings, committees and relevant bodies and their agendas regarding uses of the system. **7-** Periodic, annual and special reports, to be issued by the system and to include components and users of each report. **8-** Roles and responsibilities in the organizational structure as well as the development requirements needed to apply the system in that training. **9-** Studies and research required to enhance the role of the system. **10-** List of references for evaluating AMAN as an institution; core program, supporting projects.

- AMAN will rely on the set of preliminary indicators in its 2025 strategy to measure the medium-term change results, as well as the set of indicators that assess AMAN's overall institutional performance

8.4 Measurement indicators of AMAN's overall performance

Indicators	Sources and Means of Verification
1. Percentage of increase of individuals who are willing to report suspicions of corruption without fear; rate of increase in their confidence of the anti-corruption efforts exerted by all those concerned.	An annual survey using a sample representing community groups and conducted by an independent body.
2. The total number of recommendations, provided by AMAN and partners, on the strengthening of the integrity and anti-corruption system that are adopted by various parties; detailed according to: legislation, measures, programs and institutions providing public services, or oversight and anti-corruption institutions, CSOs, universities, unions, federations and representative organizations.	Documenting recommendations of studies and reports conducted by AMAN and partners, as well as conducting yearly monitoring of the extent by which these recommendations are applied by the concerned parties.

3. Rate of increase in the number of anti-corruption activists from CSOs, media and other activists that are engaged in combating corruption whether through conducting studies, training, issuing reports or organizing accountability sessions.	Annual monitoring of interventions by CSOs and coalitions
4. Number of national, local, regional and international institutions, journalists, policymakers and academic papers that used references, recommendations and tools developed by AMAN or benefited from its experts.	Annual monitoring of institutions, bodies, journalists, policymakers and academic papers that used or benefited from AMAN's references, tools, trainers and or experts.
5. Satisfaction rate of employees and members of the general assembly, partner institutions and relevant community, official and international institutions of AMAN's performance in terms of professionalism, fairness, independence and importance of relevant interventions.	An annual survey conducted by AMAN's Oversight and Evaluation Unit.

Acronyms used in this document:	
The Coalition for Accountability and Integrity-AMAN	AMAN/ the Coalition
The Palestinian Authority	PA
The Palestine Liberation Organization	PLO
The Ministry of Social Development	MoSD
Gaza Strip	GS
West Bank	WB
Gaza Strip and WB	GS and WB
Civil Society Organization	CSO
Non-Governmental Organization	NGO
Local Government Unit	LGU
The Anti-Corruption Commission	ACC
The Palestinian Legislative Council	PLC
The Palestinian State Audit and Administrative Control Bureau	SAACB
The General Personnel Council	GPC
The Independent Commission for Human Rights-(Ombudsman)	ICHR/ Ombudsman
Transparency International Organization	TI
The National Integrity System	NIS
Sustainable Development Goals	SDG
Oversight, Evaluation, Learning and Accountability	OELA
The Civil Society Team for Enhancing Public Budget Transparency	The Team/the Civil Team