



---

**Coalition for Integrity and Accountability – AMAN**

**Administrative Report 2022**

**April 2023**



## **Introduction**

This report provides a general overview of the key activities and achievements implemented and accomplished by AMAN Coalition during 2022 as an executive team and governance body (board of directors, oversight committee, and internal audit). The executive team successfully executed all planned activities for 2022 with high efficiency, while enhancing its internal governance and strengthening its local, regional, and international relationships.

## **AMAN Board of Directors Report of 2022**

During 2022, AMAN's governance held four meetings for its board of directors and one general assembly meeting. A set of goals was established to be focused on throughout 2022, including:

- Reviewing and developing AMAN's strategic orientation to respond to the developments in the integrity and anti-corruption system in Palestine.
- Reviewing and enhancing internal systems and procedures.
- Continuously improving and developing the work environment.
- Strengthening AMAN's regional and international role.

Moreover, the Internal Audit and Oversight Committee, in collaboration with the Treasurer have played a significant role in enhancing AMAN's internal governance.

### **1. AMAN's Strategy Orientation:**

The negative developments in the governance system's integrity in Palestine occupied a significant portion of the agenda of AMAN's board of directors' meetings during 2022. One of the most important aspects was the widening state of political corruption and the declining integrity of governance. This necessitated a review and enhancement of AMAN's strategy, expanding its interventions and awareness campaigns regarding the risks of political corruption. Additionally, meetings were conducted with representative bodies and active civil institutions to discuss ways to confront political corruption and build alliances in its fight. Consequently, AMAN's working strategy was reviewed and developed to include a dedicated objective to combat political corruption and enhance political integrity. The board of directors allocated a portion of their meetings to discuss issues related to elections, the intervention of security institutions in political life, cases of extortion and blackmail involving high-ranking officials, state lands, the relationship between the public and private sectors, public freedoms, and others. Based on these discussions, the board's recommendations were considered, and a set of interventions were developed, which were included in 2022 work plan.

Members of the board of directors actively participated in numerous activities carried out by the coalition. For example, they took part in the annual conference, the review of the Integrity and Anti-Corruption Report, the National Integrity Celebration, the annual conference of the Civil Forum for Promoting Good Governance in the Security Institution, and more. Additionally, they engaged in meetings with official and international entities to support the executive team in implementing the developed strategic orientations.

### **2. AMAN's Systems, Procedures, Operational Guidelines, and Governance:**

With the support of the Internal Audit and Compliance Committee, the following actions were taken:

- Approval of amendments to the complaints system after its development, including the addition of a section specifically addressing complaints related to members of the board of directors.
- Approval of amendments to the policy on the prevention of sexual harassment after its development.
- Approval of proposed amendments to the Financial Policies Guide, subjecting them to a one-year trial period.



- Discussion of the internal auditor's report and providing feedback to the executive management for further follow-up.

### **3. AMAN's Work Environment:**

- Approval of salary scale modification.
- Approval of expanding AMAN's headquarters by renting half of the third floor in the Remawi Building and hiring an additional full-time employee for the Gaza team. Additionally, contracting with a group of legal and financial consultants to provide support to the Gaza team.
- Approval of proposed amendments to the performance evaluation system to include more motivational aspects.
- Review of the staff training plan and providing recommendations to the executive management for its development.

### **4. AMAN's Regional and International Role and Its Relationships with the Donor Community and International Partners:**

- Participation in various meetings that brought together AMAN and international partners (Luxembourg, Norway, the United Kingdom, Sweden, the Netherlands, etc.), resulting in the expansion of AMAN's donor base.

### **Report on the Implementation of the Strategic Direction for 2022.**

AMAN has implemented various interventions throughout 2022, both planned and in response to emerging developments or events. These interventions generally included networking and coordination with various civil society institutions, particularly in relation to promoting political integrity and combating corruption. AMAN prepared reports, studies, and indicators covering several aspects (including political corruption, public budgeting, the security sector, local authorities, public services appointments, studies on corruption risks with a focus on gender-based corruption, annual reports, opinion polls, and etc.). Moreover, AMAN implemented capacity-building programs aimed at enhancing integrity and anti-corruption efforts, increasing societal awareness across various sectors in addition to conducting advocacy and lobbying campaigns, holding hearings and accountability sessions, and workshops, producing educational materials, and providing knowledge support to numerous institutions to incorporate accountability and integrity systems into their programs. Additionally, AMAN organized annual conferences and the National Integrity Celebration, along with participating in regional, international, and local meetings. The interventions of 2022 also involved continued efforts to develop procedures, systems, and work guidelines within AMAN, as well as improving job satisfaction levels.

The key activities and achievements at the main levels (programmatic and institutional) can be summarized according to the approved strategic objectives, which included four goals as follows:

#### **The First Strategic Objective: Enhancing integrity, transparency, accountability, and anti-corruption systems in financial management and public services administration.**

This objective includes preparing a series of reports, studies, and position papers related to the integrity and anti-corruption system, as well as implementing lobbying and advocacy campaigns to adopt their



recommendations. Within this objective, a total of 28 reports were prepared during 2022, in addition to 14 papers and reports prepared by AMAN staff, including the annual report on the state of integrity and anti-corruption in 2021. AMAN worked on analyzing corruption risks, including gender-based corruption, within various civil and security public institutions in the West Bank and Gaza Strip, including local authorities, the police force, the customs authority, and the Ministry of Health. AMAN diagnosed the situation, raised awareness, conducted diverse research, and provided recommendations and reports which were adopted within those institutions to reform their policies. Among the most important results achieved or influenced by AMAN's interventions are the following:

**First, the Council of Ministers and public institutions took 21 steps and decisions that were in line with AMAN's recommendations:**

- The Council of Ministers issued Decision No. 174 on May 9, 2022, to establish a technical committee to follow up on the issue of land leaks and the management of state lands.
- The Council of Ministers issued a decision to form a specialized committee consisting of the Ministry of Finance, the Civil Service Council, the Retirement Authority, the Ministry of Justice, and the Military Financial Administration, aimed at studying the salaries of all employees and the Civil Service Law, and providing the necessary recommendations to the Council of Ministers. This decision aligns with AMAN's recommendation to streamline the payroll. AMAN observed that many of the recommendations were directly included in the draft of the Amended Civil Service Law, as proposed by AMAN.
- The Council of Ministers issued a decision to form a specialized committee comprising the Ministry of Finance, the Civil Service Bureau, the Retirement Authority, the Ministry of Justice, and the Military Financial Administration to study the salaries of all employees and the Civil Service Law and provide the necessary recommendations in this regard to the Council of Ministers. This decision intersects with AMAN's recommendation to streamline the payroll. AMAN noted that many of the recommendations were directly included in the draft amended Civil Service Law, as proposed by AMAN.
- The Council of Ministers issued a decision on December 12, 2022 to approve the governmental formation representing the relevant entities in the Board of Directors of the Telecommunications Regulatory Authority and complete the accreditation of members of the authority from the private sector is in line with AMAN's recommendation for the governance of the telecommunications sector, particularly regarding the establishment of an independent authority to regulate and oversee the telecommunications sector. Additionally, it includes the cancellation of the provision related to the possibility of revoking or suspending licenses for national security requirements, which used to allow for political considerations and security agencies' intervention in the telecommunications sector.
- The Anti-Corruption Commission recognized that corruption based on gender is considered a form of corruption that is criminalized by law.
- The Ministry of Interior and security agencies adopted the results of the Integrity Index in the Palestinian security sector and the development of an action plan to implement the recommendations in their work which has had a positive impact on the results of the index for 2022, improving it by 6 points compared to 2020.
- Despite not achieving tangible results in the government's financial reform agenda, the plan directly incorporated various recommendations put forth by AMAN and the civil society team to support budget transparency within the framework of their oversight role on budget transparency, effective public financial management, identifying key challenges facing public financial management, and proposing solutions to the chronic budget deficit. Additionally, the launch of AMAN Monitor



“Marsad”, which included a dedicated section on the general budget, further complemented these efforts.

- The Ministry of Local Government adopted the Transparency Index for Local Authorities, developed by AMAN, as a fundamental tool for evaluating the performance of local authorities and building capacities to enhance transparency and integrity. During 2022, AMAN implemented a comprehensive program targeting the local government sector, which included a series of training sessions and capacity-building activities in collaboration with the Anti-Corruption Commission. These interventions resulted in policy and procedure modifications, as well as the adoption of recommendations by eight municipalities directly targeted by AMAN.
- The advocacy and lobbying campaigns, implemented in collaboration with partners, have contributed to enhancing public financial management and the general budget as the Council of Ministers issued a decision to establish a specialized unit responsible for monitoring all matters related to net borrowing. Additionally, the President issued a decree aimed at strengthening measures to protect state-owned lands and mitigate their exploitation by high-ranking officials.

**Second, there has been an improvement in the capabilities of partner civil institutions in the oversight and accountability of the governance system within the work of the security institution:**

During 2022, the Civil Forum for Enhancing Good Governance in the Security Sector was active, implementing four community accountability initiatives for the Palestinian security sector. These initiatives shed light on the services provided by the police, conducted by the Shams Center. They also focused on accountability based on the Unified Code of Conduct, implemented by the Liberties Center, and accountability for security services provided to women, led by the Palestinian Center for Peace and Democracy. Another initiative, "Eye on Security", focused on the situation of women working in the security sector and detained women, carried out by Filastiniyat organization. Additionally, the forum prepared a series of reports examining corruption risks in the police and preventive security apparatus, as well as the integrity index in the Palestinian security sector. The forum's activities culminated in an annual conference that was attended by the Ministry of Interior and representatives of the security agencies.

**The Second Objective: Enhancing governance integrity and holding the political class accountable for the public good.**

This objective was developed within the strategic review of AMAN, in light of the growing manifestations of political corruption. AMAN coalition allocated a budget to prepare a series of reports and papers related to diagnosing governance integrity in various fields. Dozens of lobbying campaigns were implemented on issues related to political corruption, raising awareness about this concept in society to create a societal understanding of its gravity and lay the foundation for a participatory approach to public policy reform. AMAN coalition worked on diagnosing the status quo of political integrity and political corruption by focusing on three areas: access to power (appointments and elections), exercise of power, and accountability and oversight over the exercise of power.

AMAN’s Marsad has paid more attention to tracking public decisions and examining their alignment with the public interest, such as appointments of senior officials, the involvement of the security establishment in political affairs and its decisions, the interference of the executive authority in the work



of the judicial authority, decisions related to the civil and media space, and conflicts of interest in the decisions of the Council of Ministers.

During 2022, AMAN coalition released 28 reports, papers, and studies that shed light on political integrity. Among these were 10 reports prepared by the executive team of AMAN coalition. This output was followed by a series of workshops, and lobbying and advocacy campaigns. Additionally, the annual AMAN conference was dedicated to **political integrity “the subordination of public policies to serve the public interest.”**

AMAN Coalition was able, through its interventions in this field, to provide a realistic diagnosis of the state of political integrity and the seriousness of existing political corruption. It succeeded in placing this issue on the agenda of stakeholders and activists in the Palestinian society.

**Some of the notable results that aligned with AMAN'S recommendations, campaigns, and coordinated efforts with its civil society partners are:**

- The decisions issued by the government regarding the public sector, on July 25, 2022, to establish a ministerial committee to develop recommendations for the high-level policies of human resources management and civil service. On November 21, 2022, the government approved the higher policies for the public service. On August 1, 2022, the government approved various organizational structures and job descriptions for government departments.
- Upon the request of the Council of Ministers, a meeting was held with the Prime Minister's advisor to discuss ways to implement the recommendation outlined in AMAN's report on "Political Immunity of Senior Officials and its Impact on Political Integrity."
- AMAN, along with several civil society organizations, managed to prevent the approval of several laws, regulations, and procedures that reflected the dominance of special interests of the political authority at the expense of the public interest. One of the most notable examples was the media institutions licensing system, which aimed to increase the political authority's control and limit civil and media space to serve the interests of the governing authority.
- Through its lobbying and advocacy campaign during the local elections, AMAN coalition was successful in achieving positive outcomes represented in the implementation of corrective measures by the Elections Committee before and during the electoral process, based on AMAN's correspondence that relied on citizens' complaints in the field. The aim was to prevent the ruling authority from using state resources for political interests.
- AMAN has been actively engaged in implementing lobbying and advocacy interventions with civil society organizations related to political corruption (including advocating for general elections, suspending the implementation of the security clearance requirement, addressing high-level appointments, public policies, judicial independence, presidential decrees and laws, the general budget, security institution governance, and freedoms, among others.)
- AMAN played a role in raising issues related to political corruption through local media outlets. The media, in its various forms, relied on AMAN's reports and position papers to highlight dozens of cases.



**The Third Objective: Mobilizing and engaging the community to support anti-corruption efforts and hold the governing authority accountable for the public good.**

This strategic objective emphasizes the importance of strengthening the process of mobilization and networking, whether within civil society institutions, coalitions, and networks, or directly and indirectly among citizens. It comes in light of the increasing challenges related to governance integrity in Palestine, which requires AMAN to increase its efforts and lead awareness-raising initiatives among citizens regarding the different forms of corruption, its causes, impacts, and reporting mechanisms. AMAN adopts various means to achieve this, including organizing direct awareness-raising meetings, utilizing social media platforms, engaging with the media, distributing publications, conducting educational programs and courses, and receiving individuals at AMAN's Advocacy and Legal Counseling Center. Additionally, AMAN actively networks with civil society institutions across different regions in the West Bank and Gaza Strip.

AMAN has worked on engaging various marginalized groups, such as women and people with disabilities, in lobbying and advocacy activities against gender-based and political corruption. It has achieved the following accomplishments:

- For the later implementation of the Youth Empowerment Program in holding the security establishment accountable, as part of the Integrity School programs, trained youth groups were able to execute 19 initiatives led by young people towards reforming the security sector. The Minister of Interior and heads of security agencies participated in accountability sessions and responded to the youth's inquiries, resulting in the adoption of several recommendations related to the Customs Officer and Police forces.
- For the later implementation of awareness-raising and empowerment programs targeting the media, 25 investigative journalists prepared 32 investigative reports.
- For the later implementation of awareness-raising campaigns and activities that encourage citizens to report corruption practices, especially political corruption, there was a significant increase in the number of individuals approaching AMAN, whether as informants or seeking legal support and advice in cases related to political corruption.
- There has been a noticeable increase in citizens' interest in the content of various AMAN's electronic platforms. The number of interactions and engagements through AMAN's social media platforms has increased, with approximately 105,000 followers on the Facebook page and a reachability exceeding 1,634,775. The number of followers on AMAN's Twitter page reached around 9,100. Additionally, the number of individuals interested in AMAN's Instagram page has reached 3,350 followers.
- AMAN, in partnership with Birzeit University, was able to develop a course titled "Investigative Investigations in the Field of Anti-Corruption." The course was adopted by three Palestinian universities in 2021 and four universities in 2022.
- During 2022, there was increased media interest in highlighting the issues addressed by AMAN, whether through its reports, position papers, or news about its activities. AMAN was invited for interviews and discussions a total of 120 times throughout 2022.



- The Advocacy and Legal Advice Center of AMAN received approximately 552 individuals seeking legal advice on various issues. AMAN coalition adopted 71 cases involving suspicions of corruption. Additionally, the percentage of women seeking assistance at the center increased from 11% to 13%.

**The Fourth Objective: Enhancing the institutional and organizational performance of AMAN institution, as well as to strengthen its vision and expand its partnerships at national, international, and Arab levels.**

AMAN coalition is determined, as part of its fourth strategic objective, to implement an ambitious program to enhance its organizational, administrative, and programmatic capacities. It also aims at strengthening its internal integrity system, expanding the base of donors for its main program, and increasing its activities at the international and regional levels as a center of expertise in the field of anti-corruption. The following are the key achievements made in this regard:

**1. Organizational and Institutional Capacity Building:**

- Within its current strategic priorities for 2022-2025, AMAN Coalition has recognized the need to develop its internal systems and policies to ensure compliance with international best practices. As a result, the coalition has developed a set of internal systems and policies that contribute to enhancing its commitment to good governance principles. This includes the development of a risk management policy and a guidance manual for integrating gender into AMAN's programs. Efforts are currently underway to develop financial and administrative procedures that align with best practices in this area. To support these achievements, AMAN has contracted an internal auditor to enhance internal oversight and ensure compliance with sound financial and administrative procedures outlined in its financial and administrative systems. Additionally, work is being done to develop a risk management strategy.
- The coalition has been working to enhance career development opportunities and build the capacities of its staff. Various members of the team have participated in training programs and local and international engagements that have contributed to their professional growth and increased their knowledge on emerging issues related to anti-corruption efforts, such as political integrity and combating political corruption. These activities have also focused on developing their leadership and planning skills.

**2. Relationship with the Donor Community:**

AMAN Coalition, represented by its board members, has conducted numerous productive meetings to introduce international and financial institutions to AMAN and its programs, as well as to explore opportunities for collaboration. The coalition has succeeded in attracting a new funder, the Swedish International Development Cooperation Agency (SIDA), to join its main group of funders (the governments of Norway, Luxembourg, the Netherlands, and UNDP.)

Based on the previous information:

- A financing agreement was signed with the Swedish International Development Cooperation Agency (SIDA) for a value of \$1.2 million for three years.
- The partnership agreement with the governments of Norway and the Netherlands was renewed, with continued funding of \$2.5 million for three years.





- By the end of 2022, approximately 81% of the main program budget for the years 2023-2024 has been secured, and it is expected that the remaining amount will be secured from the Luxembourg government, amounting to approximately \$1 million for three years, by May 2023.
- The budget for 2023 is expected to reach \$2.64 million (including project budgets and the main program budget), with an increase of 19% compared to 2022.

### **3. Relations with Regional and International Parties:**

AMAN Coalition has an in-house expertise that is used by Transparency International to build the capacity of similar Arab branches. During 2022, the Coalition, through the implementation of a regional project entitled "Strengthening Social Accountability Networks" (SANCUS), in partnership with Transparency International, built the capacity of Transparency International branches in Jordan, Lebanon, and Morocco in using the methodology of the local integrity system and preparing shadow report methodology prepared by AMAN Coalition on the extent of governments' commitment to achieving goal 16 of the sustainable development goals.

AMAN Coalition, in collaboration with Transparency International, has contributed to formulating international project proposals based on its expertise in mobilization, networking, and forming coalitions to enhance oversight and accountability in public financial management. Additionally, its participation in the regional conference held by Transparency International in Lebanon has contributed to identifying common priorities for Arab branches at the regional level.

AMAN Coalition actively participated in the meetings of the Arab Network for Integrity and Anti-Corruption, particularly in shaping and prioritizing the anti-corruption agenda in the Arab region. This enhanced the coalition's presence at the regional and international levels. AMAN Coalition also actively participated in the Global Anti-Corruption Conference 2022, held in the capital of the United States, Washington, D.C.

### **4. Executive Staff**

- The number of staff members reached 28, including 21 at AMAN's headquarters in Ramallah and 7 at the Gaza office, in addition to 3 consultants on contractual agreements.
- During 2022, there was one resignation due to personal housing circumstances.