AMAN
Transparency Palestine

Research Study on:

Data Flow from International Humanitarian Aid Agencies to Civil Society Organizations in the Gaza Strip (Assessment of Accountability)

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Project: «Promoting Civic Space and Social Accountability in Palestine»

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List of Concepts and Terms

Term	Defintion
International humanitarian organisations	Non-governmental or governmental organisations operating in another country or group of countries with broader objectives than relief organisations, focusing their work on sustainable development and human rights, addressing the root causes of humanitarian problems, defending the rights of vulnerable groups, achieving sustainable social and economic change, protecting human rights and empowering local communities.
Humanitarian aid	Assistance provided to meet the basic needs of those affected by disasters or wars, such as food, shelter, and healthcare. References: Principles of Humanitarian Action, reports from relief organisations
Civil society organisations	Non-profit organisations operating at the local or national level, with the aim of achieving social, political or economic goals. In the context of humanitarian aid, civil society organisations play a vital role in distributing aid and providing services to beneficiaries.
International actors	Refers to intergovernmental organisations (such as the United Nations and the European Union) and international non-governmental organisations (such as the Red Cross and Médecins Sans Frontières) working in the field of humanitarian aid.
Data	Characteristics or information, usually numerical, that are collected through observation.
Disaggregated data	Data collected, analysed and presented separately according to subcategories that allow for greater analysis and identification of trends/differences. For example, data classified by gender.
Humanitarian aid workers	All persons involved in providing protection and/or assistance to affected populations who have a contractual relationship with the participating organisation/partners, including workers from target communities who receive remunerations. This term refers to all personnel working with humanitarian agencies and organisations, including United Nations agencies, governmental organisations, non-governmental organisations, implementing partners, and relevant community-based organisations, including salaried staff, volunteers, contractors, incentive-based workers, and anyone performing a task on behalf of any humanitarian agency or organisation, regardless of the type and duration of the contract.
Accountability	Accountability systems are defined as the duty of those responsible for official positions (whether elected or appointed, ministers or civil servants and the like) to submit periodic reports on the progress of work in the institution or ministry, in a manner that clarifies their decisions and explains their policies, and to be prepared to bear the responsibilities arising from these decisions and to commit to submitting reports on the progress of work in their institution, explaining the pros and cons, and the extent of success or failure in implementing their policies at work.

Complaints	It is a means of meeting the needs of customers/beneficiaries/citizens and hearing their opinions, whereby the beneficiary expresses dissatisfaction with the outcome of services, decisions, operations, procedures, employee behaviour or service delivery methods in the expected manner, whether verbally, in writing or through one of the complaint submission methods or channels. Submitting a complaint is a right guaranteed to all beneficiaries of the organisation, and no beneficiary may be denied this right for any reason whatsoever.
Data management	Refers to the processes and systems for how the project/programme systematically and reliably stores and manages access to monitoring and evaluation data.
Data flow	Refers to the movement of data from donors to civil society organisations and then to beneficiaries. This includes financial data, logistical information, beneficiary data, and performance data.
Administrative data	Data originally collected for non-statistical purposes. The methods by which administrative data are collected and processed are determined by the administrative authority, which in most cases is a government agency.
Data quality	It is measured by a set of dimensions (elements) which are: relevance, accuracy and precision, timeliness and regularity, accessibility and clarity, validity, coherence, and completeness.
Data system	The entire network of data collectors, producers, analysts, and other data users who collect or process data directly or indirectly, and disseminate, analyse, and/or consume it in one way or another, and related services in a specific country or region.

Abstract:

This research paper discusses the impact of the genocidal war launched by Israeli occupation forces on the Gaza Strip since October 2023 on the flow of data from international humanitarian aid agencies to civil society organisations in the Strip. The study focuses on analysing the ability of these organisations to exercise accountability regarding the transparency and effectiveness of the work of these agencies in light of the catastrophic conditions in the Strip.

The paper begins by highlighting the widespread destruction of government infrastructure and public services, and the restrictions imposed by the occupation forces on the work of international institutions through the closure of crossings, targeting of staff, and cutting communications, which has led to a severe humanitarian crisis and increased pressure on relief services due to high rates of poverty, unemployment, and internal displacement. The paper also highlights the growing role of international agencies in providing humanitarian aid, especially given the decline in the capacities of local government and civil society organisations, while noting the complexities of holding these actors accountable under these circumstances.

The study aims to analyse the data flow pathways from international actors to civil society organisations in the Gaza Strip, assessing the strengths and weaknesses of these pathways and identifying the technical, security, administrative and political challenges and constraints that hinder data flow and their impact on civil society's accountability capacity. The paper also provides practical recommendations to strengthen this capacity.

A multi-source methodology was used, including a review of literature and previous reports, interviews with representatives of relevant organisations, focus groups, and qualitative data analysis, with the aim of understanding the reality of data flow and existing accountability mechanisms.

The main findings revealed the absence of clear and approved data flow channels and the existence of multiple intertwined restrictions that hinder the flow of information from international entities to civil society organisations, thereby weakening the effectiveness of oversight and accountability. The study also revealed a low level of transparency, weak accountability mechanisms, and a lack of effective complaint mechanisms, which negatively affected the efficiency of the aid provided and undermined trust between the parties concerned.

Based on these findings, the study offers a set of recommendations that focus on strengthening coordination between international actors, civil society organisations and government agencies, reviewing existing restrictions, developing standardised data flow pathways, simplifying administrative procedures, and enhancing transparency through the publication of periodic reports. Developing effective mechanisms for receiving complaints, building the capacity of local organisations to monitor and analyse data, and initiatives to enhance mutual trust.

In summary, the paper emphasises that developing an effective and transparent system for data flow and accountability in the Gaza Strip, through the development of a coordinated working formula between civil society institutions, Palestinian civil society organisations on the ground in the Gaza Strip, and opening a dialogue with international institutions to determine mechanisms for information flow and the submission and publication of periodic reports to the public, is a decisive factor in ensuring the quality and effectiveness of humanitarian aid and achieving an adequate response in light of the worsening crisis.

I. Introduction:

The genocidal war waged by the Israeli occupation power on the Gaza Strip since 8 October 2023 has caused widespread destruction of government infrastructure and public services, as well as the systematic destruction of the economic and social sectors in all their components. The occupation forces have also imposed suffocating restrictions on international institutions working in the field of humanitarian aid by continuously closing crossings, targeting humanitarian personnel, destroying permanent and temporary headquarters, cutting off communications and internet services that are essential for the continued provision of humanitarian aid, and even preventing the entry of relief supplies as a form of collective punishment imposed on civilians. The United Nations Office for the Coordination of Humanitarian Affairs has indicated that since 2 March, the occupying forces have continued to close crossings and prevent the entry of vital supplies of food, water, fuel and medicine, causing a humanitarian disaster and raising levels of starvation to dangerous levels.

In light of these catastrophic conditions and the unprecedented rise in poverty and unemployment rates, the demand for humanitarian assistance services has doubled as a result of the increasing numbers of displaced persons and internally displaced persons, the sharp deterioration in living conditions, rising commodity prices, and the disappearance of food supplies.

The systematic targeting of local government structures, the undermining of the central government's capabilities, the disruption of the work of key UN agencies (UNRWA), the targeting of civil society organisations and their field staff, and restrictions on freedom of movement and communication all of which has led to an expansion of the responsibility of international agencies in providing humanitarian relief during the war of extermination. These agencies have greater mobility due to their coordination with the occupation, which gives them a major responsibility in providing humanitarian services and obliges them to uphold ethical and moral duties towards beneficiaries and their representatives from civil society organisations, especially since they have become the last resort for meeting humanitarian needs since the outbreak of the war. Estimates indicate a remarkable increase in the number of these international organisations, reaching 43 according to the AEDA network, while the network of civil society organisations estimates the number to be more than one hundred.

Although holding these international agencies accountable may be complicated, given the challenges faced by civil society organisations such as lack of resources or pressure on the ground, it remains necessary in conflict situations to ensure that humanitarian work complies with international standards, serves the interests of the Palestinian people and limits corruption.

Such accountability requires clear and regular channels for the flow of data from these agencies to civil society organisations, so that it is not limited to information sharing, but also enables the strengthening of accountability efforts at the local and national levels. These channels must include the provision of detailed data and explanations about the agencies' plans, programmes and budgets, as well as accountability for the quality of performance and the commitment of their staff to humanitarian principles.

The tragic conditions in the Gaza Strip and the population's complete dependence on humanitarian aid for survival require international humanitarian actors to develop effective and flexible channels for the continuous flow of data to service beneficiaries and their representatives from civil society organisations, enabling them to exercise their role in participation and accountability. Accountability in times of crisis is the cornerstone of ensuring that humanitarian aid reaches those in need, especially in complex contexts such as that of the Gaza Strip. Transparency in the flow of data is a crucial element in enhancing this participation, reducing corruption, improving the level of trust between donors and civil society, and ensuring that aid reaches those who deserve it.

Adopting a holistic approach to data flow among all local and international actors working in the humanitarian field is an important pillar for building trust and improving the quality of decisions and emergency response at the local and international levels, thereby enhancing coordination and participation and unifying efforts in light of the exceptional challenges facing the sector.

II. Main Objectives of the Research Paper:

This research paper aims to highlight the issue of data flow from international humanitarian aid agencies with the participation of civil society organisations in the Gaza Strip, and to analyse the impact of this on the ability of these organisations to engage effectively with those agencies.

It should be noted that this paper does not address database issues from a statistical or operational perspective, nor does it cover data flows from UN agencies to civil society organisations. Instead, it focuses exclusively on the role of international organisations working in the field of humanitarian aid.

The paper focuses in particular on examining data flow pathways from international actors to civil society organisations, identifying strengths and weaknesses in these pathways, reviewing the main challenges and constraints facing the data flow process, and assessing the impact of these challenges on civil society's capacity for participation and accountability. The paper also seeks to provide practical recommendations to improve the ability of civil society organisations to hold international actors accountable for the flow of data related to humanitarian aid.

2.1 Sub-objectives of the Research Paper

- Analyse and examine data flow pathways from international humanitarian aid agencies to civil society organisations in the Gaza Strip, focusing on identifying strengths and weaknesses, as well as challenges specific to the local context of the Strip.
- Identify and evaluate current mechanisms for data flow from international actors to civil society organisations in the Gaza Strip, and measure their effectiveness and efficiency.
- Identify constraints on data flow at key levels (technical/technological, logistical, political/security, administrative/regulatory, policy/programmatic) and analyse the impact of these constraints on the ability of civil society organisations to engage and hold accountable.
- Propose a set of procedural recommendations that would enhance the capacity of civil society organisations to engage with and hold accountable international actors involved in securing and distributing humanitarian aid.

III. Research Methodology:

A multi-source methodology was adopted to collect and analyse data with the aim of understanding the impact of the genocide on the flow of information from international actors to civil society organisations in the Gaza Strip. The study methodology included the following steps:

- **Review of previous literature:** This included analysing and evaluating reports and correspondence issued by the Aman Coalition, as well as documents and studies issued by UN agencies and international and civil society organisations related to humanitarian aid.
- **Qualitative data collection:** Direct interviews were conducted with representatives of civil society organisations and international organisations, as well as other relevant parties, to gain in-depth insights into the mechanisms and challenges of data flow during the war.
- **Focus groups:** Two focus groups were held, each comprising a number of representatives of civil society organisations that collaborate with international organisations in providing relief assistance, both financial and in-kind, during the conflict.
- **Data analysis:** Qualitative analytical methodologies were used to interpret the information collected, with the aim of identifying the challenges and issues facing data flow between different parties.
- **Conclusions and recommendations:** Based on the analysis, clear conclusions were presented addressing the most prominent challenges, with practical recommendations and feasible pressure and advocacy mechanisms to enhance the effectiveness of information flow and improve cooperation between stakeholders.

IV. Data Flow and Accountability Pathways in the Gaza Strip Qualitative analysis based on personal interviews and focus groups with international actors and civil society organisations.

4.1 Data Flow before the Genocide:

The Gaza Strip is considered an active environment in terms of emergency humanitarian interventions, as a result of the repeated political and military crises that have affected the humanitarian situation in the Strip over the past two decades. This situation has led to increased activity by many international organisations, UN agencies and government ministries involved in providing humanitarian aid[1]. Not to mention the intensive presence of UNRWA, given that more than a third of the population are refugees.

The Ministry of Social Development and the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) have been among the most prominent actors in the field of humanitarian aid in Gaza, alongside many international organisations and local civil society partners[2].

With the onset of the Palestinian political divide in 2007-2008, information exchange and data flow between actors declined significantly as a result of political influences. The process of updating databases came to a near standstill, as international organisations and civil society organisations rejected the restrictions that the Ministry of Social Development attempted to impose on beneficiary data, such as the requirement to obtain prior approval for beneficiary lists in order to prevent duplication and promote integrity, which was considered an interference in the work of humanitarian organisations[3].

As a result, there were multiple databases and data flows between donors and civil society organisations, which affected the efficiency of aid distribution. This included financial data, logistical information, beneficiary data, and performance data[4].

In early 2014, thanks to multilateral national dialogues, data sharing resumed between UNRWA, international organisations, civil society organisations, and the Ministry of Social Development as the central government representative. However, the timing of the information exchange was after the provision of assistance, with the aim of ensuring that there was no duplication of benefits and that these were documented[5]. The data flow was not intended to be used in the accountability process, as it was not presented in the form of detailed reports on binding plans to the official Palestinian parties (the Ministry of Social Development).

The United Nations Office for the Coordination of Humanitarian Affairs (OCHA) also established clusters comprising UN agencies, international organisations, government institutions and non-governmental organisations. These groups held regular meetings to coordinate and expedite the flow of data related to humanitarian aid. However, some international organisations were not part of these groups and implemented their programmes independently without partnering with Palestinian civil society organisations[6].

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1 UN OCHA. (2013). Gaza Strip: Humanitarian Overview. United Nations Office for the Coordination of Humanitarian Affairs.
2 UNRWA. (2014). Annual Operational Report. United Nations Relief and Works Agency for Palestine Refugees.
3 World Bank. (2015). Data Management and Humanitarian Coordination in Gaza. Washington, DC: World Bank Publications.
4 Save the Children. (2014). Challenges in Data Sharing during Humanitarian Crises in Gaza. Save the Children Report.
5 Palestinian Central Bureau of Statistics (PCBS). (2015). Humanitarian Assistance and Coordination in Gaza.
6 UN OCHA. (2014). Humanitarian Coordination Structures in Gaza. United Nations Office for the Coordination of Humanitarian Affairs.

In addition, thematic coordination groups were established as key tools for humanitarian response, contributing basic information derived from needs assessments and monitoring to support the development of the strategic objectives of the Humanitarian Country Team. These groups include relevant stakeholders, including local authorities, non-governmental organisations and United Nations agencies, and work to coordinate assessments, data management, strategic planning, technical standard setting, and monitoring and reporting on the effectiveness of emergency response[7].

Despite the publication of a series of periodic reports by the United Nations Office for the Coordination of Humanitarian Affairs entitled 'Humanitarian Situation Update,' the flow of data from international organisations to civil society institutions has not been regular or sustainable, but rather has remained linked to partnership agreements and implemented projects[8].

4.2 Date Flow During the Genocide

Throughout the genocide war, the Israeli occupation forces have intentionally destroyed official institutions' capabilities to weaken their control over the management of humanitarian and relief aid. The occupation also suspended the work of the United Nations Relief and Works Agency for Palestine Refugees (UNRWA), with the Knesset approving a bill in October 2024 prohibiting the agency from operating within Israel, thereby revoking the 1967 agreement that allowed UNRWA to operate in Israel and prohibiting contact between Israeli officials and UNRWA staff[9].

With the two largest parties (the central government and UNRWA) unable to operate, new actors from UN and international organisations emerged to provide aid and fill the void. The World Food Programme became the main distributor of food aid in the Gaza Strip, alongside other international institutions such as the World Central Kitchen, Rahma Foundation, and ANERA, which expanded their roles in emergency humanitarian response[10].

Due to the absence of the central government and UNRWA, new international organizations appeared as key actors in relief efforts. The World Food Program turned into the most important distributor of foodstuff. Other organisations also intervened, including the World Central Kitchen, Rahma Foundation, ANERA, and others. However, in an interview conducted with Mr. Amjad Al-Shawa, Director of NGOs Network in Gaza[11], he mentioned that many of these organisations have not been members of the clusters before the war. Consequently, the data flow toward the civil society organisaitons has weakened significantly.

The impact of the war on the flow of data from international sources to civil society organisations can be summarised as follows:

• There is lack of coordination and coordination among aid providers in all areas of the Gaza Strip.
• The United Nations Coordination Office for Humanitarian Affairs (OCHA) continued its operations, but the pre-war data flow paths have stopped for operational, technical and logistic reasons[12].
• WFO has reestablished data flow paths with the Ministry of Social Development in April 2024 but suspended them quickly for security fears. As a result, there is a quasi-complete suspension of information exchange among different actors[13].

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7 Sphere Project. (2011). Humanitarian Charter and Minimum Standards in Humanitarian Response.
8 UN OCHA. (2015). Humanitarian Bulletin: Gaza Strip. United Nations Office for the Coordination of Humanitarian Affairs.
9 UNRWA. (2024). Announcement of the suspension of the Agency's operations in Israel. Available at: https://www.unrwa.org/newsroom
10 World Food Programme. (2024). Report on the role of the World Food Programme in Gaza. Available at : https://www.wfp.org
11 Personal interview with Mr. Amjad Al-Shawa, Director of the Network of Civil Society Organisations in the Gaza Strip, 2 June 2025.
12 OCHA. (2024). Humanitarian Coordination Report in Gaza. United Nations.
13 World Food Programme. (2024). Report on the role of the World Food Programme in Gaza. Available at: https://www.wfp.org

During the war, OCHA Office has maintained the clusters meetings in cooperation with the NGOs Network in the North of Gaza Wadi (Valley) to sustain information management services to facilitated accelerated and effective response based on humanitarian principles. OCHA gathers data and information that inform its coordination, decision-making, and advocacy efforts and share it with its partners[14].

Most civil society organisations face significant challenges in participating due to security restrictions, barriers to movement between governorates, language barriers, and technical constraints resulting from the loss of expertise due to martyrdom, injury or departure. Despite the efforts of the civil society network to Arabise the humanitarian system, provide simultaneous translation, and raise awareness of the importance of sectoral groups, these challenges remain[15].

To strengthen the role of civil society organisations, an Area Based Coordination (ABC) system was established, which provided better spaces for data and information exchange, especially since Arabic is the primary language of these meetings, which helped to broaden the participation of civil society institutions[16].

The main objective of the flow of data from UN agencies and international organisations to civil society organisations was not accountability, but rather information management for rapid and effective response, coordination, decision-making and advocacy. However, the network of civil society organisations held these agencies accountable during the meetings of the Humanitarian Country Team[17].

4.3 Restrictions limiting data flow from international actors to civil society organisations in the Gaza Strip

4.3.1 Restrictions Due to the Deteriorating Political and Security Situation

The flow of data from international agencies to civil society organisations in the Gaza Strip faces significant obstacles due to the deterioration of the security and political situation. Increased risks to international teams have made it difficult for them to access sources of information and collect data from affected areas (OCHA, 2024). The suspension of field activities has also led to a severe lack of information on humanitarian needs, hampering the ability of institutions to effectively target their interventions[18].

Political and security restrictions also affect the ability of civil society organisations to exercise accountability, as the difficulty of accessing and sharing data limits their ability to document violations and hold actors accountable. Furthermore, the climate of fear resulting from these restrictions reduces opportunities for effective accountability[19]. On the other hand, donor accountability may raise concerns among some civil society organisations about funding cuts, which limits their freedom[20].

In addition, the Israeli occupation closely monitors online data traffic and blocks websites and digital services it considers a threat to its national security, reducing the ability of civil society organisations to communicate with international supporters[21]. Furthermore, restrictions on the movement of individuals within Gaza hinder their ability to communicate with the outside world and exchange data and information[22]. Israel also puts pressure on some international donors to prevent them from funding civil society organisations it considers 'hostile,' reducing these organisations' access to vital data[23].

14 OCHA. (2024). Humanitarian Coordination Report in Gaza. United Nations.
15 Palestinian Centre for Democracy and Conflict Resolution. (2024). Challenges facing civil society organisations in the context of war.
16 International Development Centre. (2024). Reports on coordination at the regional level in the Gaza Strip.
17 OCHA. (2024). Humanitarian Coordination Report in Gaza. United Nations.
18 Humanitarian Policy Group (HPG). (2023). Accountability and humanitarian data. ODI
19 Jarrar, R. (2022). Civil society accountability challenges in Palestine. Birzeit University
20 Brown, D., Donini, A., & Knox Clarke, P. (2018). Engagement of local actors in humanitarian action. Humanitarian Policy Group.
21 Al Jazeera. (2024). Israel's digital surveillance of Gaza. Al Jazeera English
22 Euro-Mediterranean Human Rights Monitor. (2024). Gaza under siege. Euro-Med Monitor
23 Amnesty International. (2023). Israel's restrictions on Palestinian NGOs. Amnesty International.

4.3.2 Technical and Technological Restrictions

The communications and internet infrastructure in the Gaza Strip has been extensively damaged, leading to frequent interruptions and severe slowdowns in internet services, which hinders these organisations' ability to transfer large or sensitive data[24]. In addition, internet access for employees of these institutions has become restricted to their presence in the office due to service interruptions after working hours[25].

During the war, the occupying authorities impose additional restrictions on access to certain websites and essential services, limiting the ability of organisations to obtain vital information[26].

Furthermore, the destruction of central data storage units at government headquarters, UNRWA, and international and local organisations has significantly impaired their ability to manage data[27].

4.3.3 Logistic Restrictions

From a logistical standpoint, the destruction of civil society organisations' and international institutions' headquarters and property, coupled with the ongoing blockade, closure of border crossings and import and export restrictions, has hampered these organisations' access to the energy sources, devices and equipment needed to manage and store data[28]. These organisations also suffer from a shortage of specialised technical human resources, which hinders data management and flow[29].

4.3.4 Administrative/ Organisational Constraints

Civil society organisations face severe administrative and organisational difficulties as a result of declining coordination and networking among humanitarian aid actors, which complicates the flow of data from international organisations to local civil society. The absence of clear and unified channels for data exchange between parties also hinders the flow of information necessary for effective decision-making. According to an interview with Mr. Amjad Al-Shawa, Director of the Network of Civil Society Organisations in the Gaza Strip, the absence of a stable regulatory framework and the weak capacity of civil society organisations to participate effectively in coordination platforms increases chaos and weakens transparency in the flow of information[30].

4.3.5 Program/ Policy Constraints

Many international organisations have shifted their priorities away from supporting accountability in favour of focusing on emergency response and direct relief, which has been reflected in the allocation of resources needed to ensure the flow of accurate data that supports accountability and evaluation[31]. Some donors also impose complex conditions for obtaining funding, which limits the independence and flexibility of civil society organisations in pursuing the needs of local communities and holding international actors accountable[32].

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24 UNICEF. (2024). State of communications in Gaza. UNICEF

25 OCHA. (2024). Humanitarian needs overview Gaza 2024. United Nations Office for the Coordination of Humanitarian Affairs.

26 Reporters Without Borders. (2024). Internet restrictions in Gaza. RSF.

27 Al Mezan Center for Human Rights. (2024). Annual Humanitarian Report. Gaza: Al Mezan

28 UNRWA. (2024). Humanitarian challenges in Gaza. UNRWA

29 OCHA. (2024). Humanitarian needs overview Gaza 2024. United Nations Office for the Coordination of Humanitarian Affairs.

30 Personal interview with Mr. Amjad Al-Shawa, Director of the Network of Civil Society Organisations in the Gaza Strip, 2 June 2025.

31 UNDP. (2024). Crisis response and data challenges in Gaza. United Nations Development Programme.

32 Jarrar, R. (2022). Civil society accountability challenges in Palestine. Birzeit University

The priorities of civil society organisations within Gaza itself have also been affected, with their focus shifting to relief work and accountability taking a back seat to meeting urgent needs, which has affected the quality of the data they collect and the objectives for which it is used[33].

4.3.6 Funding Constraints

Civil society organisations in Gaza face financial constraints that hinder their efforts to collect and analyse the necessary data, due to weak funding and scarce resources[34]. This, in turn, affects their ability to access the necessary technologies and tools, or to employ specialised personnel capable of managing data professionally[35].

4.4 Impact of data flow restrictions on the ability of civil society organisations to hold international humanitarian aid agencies accountable

Accountability systems are fundamental principles that ensure the integrity of humanitarian work. They require officials, whether elected or appointed, to submit regular reports explaining the work of their institutions, clarifying the decisions and policies that have been followed, and indicating the extent to which specific objectives have been achieved. These systems also require accountability for positive or negative outcomes, with a commitment to explain decisions to the general public, including beneficiaries and the civil society organisations that represent them.

Accurate data is the cornerstone of effective accountability, enabling civil society organisations to monitor the performance of international agencies, assess the effectiveness of aid programmes, and evaluate these agencies' compliance with international humanitarian standards. Data also contributes to directing aid more fairly and effectively, ensuring that it reaches those most in need.

However, the ability of civil society organisations in the Gaza Strip to exercise their oversight and accountability role is negatively affected by restrictions on the flow of data related to humanitarian aid, especially in the context of ongoing war and what has been described as genocide. These restrictions significantly limit access to information necessary to assess programme effectiveness, review resource use, and verify the integrity of international actors.

According to an interview with Professor Amjad Al-Shawa, the lack of accurate data makes civil society organisations unable to exercise their role in accountability and review, which weakens the local community's trust in donors and creates uncertainty about the allocation of resources[36].

In a special interview, Prof. Mohammed Abu Matar pointed out that depriving civil society organisations of relevant data constitutes a violation of humanitarian agencies' obligations under international law, which imposes transparency as a prerequisite for ensuring the protection of beneficiaries' rights[37].

For his part, Dr. Abdel Moneim Al-Tahrawi explained that the lack of data flow leads to weak monitoring of aid flows and increases the chances of waste and misallocation, especially in light of the significantly changing needs during crises and wars[38].

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33 Brown, D., Donini, A., & Knox Clarke, P. (2018). Engagement of local actors in humanitarian action. Humanitarian Policy Group.
34 Al Mezan Center for Human Rights. (2024). Annual Humanitarian Report. Gaza: Al Mezan
35 Euro-Mediterranean Human Rights Monitor. (2024). Gaza under siege. Euro-Me Monitor.
36 Personal interview with Mr. Amjad Al-Shawa, Director of the Network of Civil Society Organisations in the Gaza Strip, 2 June 2025.2025
37 Interview with Prof. Mohamed Abu Matar, legal advisor and associate professor of public law at Al-Azhar University in Gaza.
38 Interview with Dr. Abdel Moneim El-Tahrawy, a local expert in the field of humanitarian work.

Mr. Abdullah Al-Araj emphasised that the lack of data directly affects vulnerable groups, such as children and women, as it is difficult to ensure that their needs are met fairly and equitably without accurate information to determine priorities for intervention[39].

Mr. Naji Naji also pointed out that data restrictions hamper civil society organisations' efforts to build clear and effective accountability systems, leading to a decline in the quality of humanitarian programmes and making it almost impossible to evaluate their performance[40].

Accordingly, restrictions on data flow represent a structural obstacle to the accountability of international actors operating in the Gaza Strip and limit the ability of civil society institutions to ensure transparency and integrity.

4.4.1 Difficulties in Monitoring and Oversight

Restrictions on the flow of data from international humanitarian aid agencies lead to a lack of comprehensive and accurate data needed by civil society organisations to monitor activities, document violations or irregularities, and assess their impact on beneficiaries. This lack significantly hinders the ability to determine the extent to which aid reaches its intended targets, as well as the efficiency with which resources are used.

According to an interview with Dr. Abdel Moneim El-Tahrawy, these difficulties hamper monitoring capabilities and increase the likelihood of undetected deviations in programme implementation[41].

4.4.2 Weak Transparency Hinders Monitoring and Evaluation Mechanisms

Data flow restrictions negatively affect the availability of information related to the distribution of humanitarian aid, lists of beneficiaries, and the suitability of the type and quantity of aid to their needs, as well as decision-making mechanisms, communication channels, and protection systems. All of this limits the ability of civil society organisations to use effective participation and accountability mechanisms and narrows their options in this area.

For example, Abdullah Al-Araj explained that restrictions on financial data related to aid prevent the implementation of the expenses tracking (PETS) tool, which aims to enhance transparency in the management of aid funds[42].

4.4.3 Weak Cooperation and Coordination

The lack of data hinders coordination and networking between international agencies and civil society organisations, creating an environment that is not conducive to the exchange of information, experiences and lessons learned, and reducing the effectiveness of humanitarian aid.

In this regard, Mr. Amjad Al-Shawa emphasised that this lack of information flow hinders the building of effective partnerships and limits joint efforts to improve aid delivery[43].

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39 Interview with Abdullah Al-Araj, head of in-kind aid at the Wafaq Association for Women and Children, 22 May 2025.
40 Interview with Naji Naji, Humanitarian Operations Officer at the Social Development Forum, 1 June 2025
41 Interview with Dr. Abdul Moneim Al-Tahrawi, a local expert in the field of humanitarian work..
42 Interview with Abdullah Al-Araj, in-kind assistance officer at the Wifaq Association for Women and Child Care, May 22, 2025.
43 Interview with Mr. Amjad Al-Shawa, Director of the NGO Network in the Gaza Strip, June 2, 2025

4.4.4 Limited Impact Assessment

Accountability is an essential framework for identifying and measuring progress towards humanitarian aid objectives and helping to set effective short- and long-term goals. However, data flow constraints limit the ability of civil society organisations to conduct comprehensive assessments of long-term impact, understand ongoing challenges, identify future needs, and develop sustainable strategies.

Professor Naji Naji pointed out that the lack of detailed data makes continuous assessment difficult and limits the ability of organisations to develop effective strategies that keep pace with changes on the ground[44].

4.4.5 Weak Trust

The lack of transparency and weak accountability systems lead to a decline in trust between civil society organisations and international aid agencies, which negatively affects future cooperation opportunities and weakens the effectiveness of aid delivery.

According to an interview with Professor Amjad Al-Shawa, the decline in trust poses a threat to the sustainability of partnerships and limits civil society's ability to effectively monitor the implementation of relief programmes[45].

4.4.6 Weak Opportunity for Accountability

Accountability means that people in public office or positions of responsibility are held accountable for their actions and decisions, in accordance with legal, administrative and ethical regulations, thereby ensuring the principle of no impunity. These mechanisms help motivate institutions and individuals to adhere to standards and achieve their goals.

However, restrictions on data flow limit the ability of civil society organisations to exercise legal oversight to monitor any violations of laws, regulations or policy guidelines. They also hinder administrative and ethical follow-up mechanisms related to principles of integrity, such as compliance with codes of conduct, conflict of interest disclosure policies, and gender-based corruption protection policies.

Prof. Mohamed Abu Matar emphasized that the lack of sufficient data undermines civil society's ability to hold international actors accountable and review their commitment to applying laws and ethical standards[46].

4.4.7 Weak Transparency

Accountability and transparency are based on the availability of accurate and transparent data, as no real accountability can be achieved in the absence of transparency. The function of transparency is fulfilled when it is closely linked to accountability, so that officials and employees of international organisations are subject to close scrutiny by civil society organisations and the public, through the provision of information that enables them to assess the institutions' commitment to their goals and humanitarian mission.

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44 Interview with Naji Naji, Humanitarian Operations Officer at the Social Development Forum, June 1, 2025.
45 Interview with Mr. Amjad Al-Shawa, Director of the NGO Network in the Gaza Strip, June 2, 2025.
46 Interview with Prof. Dr. Muhammad Abu Matar, legal advisor and associate professor of public law at Al-Azhar University, Gaza.

In this context, Dr. Abdel Moneim El-Tahrawy pointed out that the lack of transparency weakens the ability of civil society organisations to monitor the implementation of relief programmes and makes it extremely difficult to assess the commitment of humanitarian institutions to standards of integrity[47].

4.4.8 Weak Data Flow and Emergence of Corruption

The lack of accurate data and its non-publication by international agencies and civil society organisations led to a number of instances of corruption in the humanitarian aid sector during the war, as confirmed by multiple field interviews conducted as part of this study. The lack of transparency and weak data exchange systems were reflected in the following points:

- **Decline in the integrity of some beneficiaries:** Due to the absence of a unified and updated database, cases of exploitation emerged by some beneficiaries who were able to receive repeated aid from more than one source, while others were deprived of it despite their actual need.
- **Corruption among some distribution officials:** The lack of oversight and inadequate data have allowed some individuals or entities responsible for distributing aid to manipulate beneficiary lists, including by adding acquaintances or relatives without clear or fair criteria.
- **Misuse of aid by some institutions:** As a result of the lack of accountability based on documented data, complaints were recorded about some local or international institutions using aid for purposes other than those stated, or distributing it according to internal institutional priorities that did not comply with criteria of fairness and need.
- **The spread of the phenomenon of selling aid in markets:** Many participants documented the appearance of humanitarian aid intended for free distribution being offered for sale in local markets, reflecting a leak in the distribution chain caused by weak oversight resulting from the absence of accurate tracking data.
- **The escalation of the phenomenon of 'war profiteering' with aid:** Some parties have taken advantage of the war conditions to monopolise or resell aid illegally, due to the lack of tracking and documentation mechanisms that transparent and up-to-date data can provide. This has distorted the nature of humanitarian work and turned it into a tool for personal or group gain.

These phenomena underscore the urgent need to develop integrated and transparent data systems that enable civil society organisations and regulatory bodies to track the flow of aid, hold implementing agencies accountable, and ensure that aid reaches its intended beneficiaries without manipulation or exploitation.

4.5 Current Accountability Mechanisms Relating to the Flow of Data from International Humanitarian Aid Agencies to Civil Society Organizations in the Gaza Strip

Civil society organisations are considered public institutions by law, owned by their members from the general public, and act as agents of the community they represent. This requires them to act in the public interest and meet the various needs of society. Their legitimacy therefore derives from their constituents and the laws governing their work, which impose clear obligations of accountability and transparency.

The accountability mechanism is one of the most important tools for monitoring performance in this field, as it sets a standard for the performance of employees in international organisations working in the humanitarian aid sector, allowing for the evaluation of their work and the promotion of integrity. This was confirmed by Professor Naji Naji, who pointed out that the commitment of international bodies to reporting and publishing data remains an important tool for enabling civil society to monitor and follow up[48].

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47 Interview with Dr. Abdul Moneim Al-Tahrawi, a local expert in humanitarian work
48 Interview with Naji Naji, Humanitarian Operations Officer at the Social Development Forum, June 1, 2025

Despite the impact of the genocide on the flow of data from international institutions to civil society organisations, some accountability mechanisms remain in place, albeit at a minimum level. The most prominent of these are:

- Submission of Periodic Reports
Some international organisations working in the field of humanitarian aid in the Gaza Strip are committed to publishing periodic technical and financial reports via their digital platforms, in addition to providing copies to their local partners from civil society organisations, and holding meetings to discuss them when necessary.

- Field visits:
International bodies facilitate field visits for civil society organisations, such as the Network of Civil Society Organisations, to enable civil society representatives to learn about aid distribution mechanisms, verify their performance, and submit their inquiries and observations. which Professor Amjad Al-Shawa considers a positive step, but still insufficient to meet the requirements of full transparency.

- Beneficiary committees or local committees:
It was noted that some international organisations encouraged the formation of beneficiary committees or local committees in cooperation with their local partners, with the aim of monitoring aid distribution activities, ensuring compliance with standards, and allowing them to submit their observations through meetings or by filling out forms.

- Establishment of complaint mechanisms:
The majority of international organisations in the Gaza Strip are committed to establishing clear channels for receiving complaints from beneficiaries or civil society organisations in the event of violations or mismanagement of resources, such as

IV. Findings

1. Absence of approved data flow channels:

The results showed that there are no clear and specific channels for organising data flow between international humanitarian aid agencies operating in the Gaza Strip and civil society organisations. This is due to the repeated targeting of central government institutions (such as the Ministry of Social Development) and the disruption of the work of the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA), as well as the expanding role of international organisations in providing aid. The results also showed the absence of unified databases that bring together all actors.

2. Significant restrictions on data flow

The study revealed multiple and significant restrictions that hinder the flow of data between international actors and civil society organisations in the Gaza Strip. These restrictions are linked to political, security, logistical, technical, administrative and financial factors, which limit the effectiveness of information exchange.

3. Intertwined structural constraints

The study revealed the existence of overlapping structural constraints that negatively affect the flow of data from international donors to civil society organisations, in addition to weak cooperation and coordination between the parties concerned, which further complicates the problem.

4. Negative impact on civil society's accountability capacity

The findings show that restrictions on the flow of data related to humanitarian aid, especially in the context of genocide, limit the ability of civil society organisations in the Gaza Strip to fulfil their accountability role. These restrictions hinder the ability of these institutions to access the information necessary to evaluate aid programmes, monitor the use of resources, and verify the commitment of international actors to transparency and accountability standards, thereby weakening their ability to build effective accountability systems.

5. Weakness of existing accountability mechanisms

The findings pointed to significant weaknesses in current accountability mechanisms, making it difficult for civil society organisations to effectively monitor the use of funds and aid. A lack of transparency and difficulty in accessing data were also noted, as well as the absence of clear and effective complaint mechanisms and the weak capacity of civil society organisations to monitor and oversee the use of aid.

6. Negative impact on the effectiveness of humanitarian aid

The study showed that data constraints and weak accountability mechanisms have had a negative impact on the effectiveness of the aid provided, as civil society organisations face difficulties in assessing the real impact of this aid, its effectiveness in achieving its objectives, and its optimal delivery to the target groups.

7. Challenges in building trust

The results confirmed that the lack of transparency and weak accountability have contributed to undermining trust between civil society organisations and international actors, hindering future cooperation opportunities and affecting the quality and effectiveness of humanitarian aid in general.

V. Recommendations

To address the challenges related to data flow and accountability in the Gaza Strip, there is an urgent need for integrated and coordinated efforts among all stakeholders, which will contribute to enhancing the efficiency of humanitarian aid, ensuring its positive impact on beneficiaries, and strengthening the capacity of civil society organisations to monitor and hold accountable such aid. The following are the proposed recommendations:

1. Strengthening coordination mechanisms

The study recommends that international actors and civil society organisations in the Gaza Strip establish joint coordination platforms that also include relevant government agencies (such as the Ministry of Social Development and the Ministry of Relief and Development), thereby contributing to improving information exchange and enhancing effective cooperation.

2. Establishing unified data flow channels

There is a need to develop a unified and organised system that defines clear channels and mechanisms for data exchange between international actors and civil society organisations in the Gaza Strip, including the creation of joint databases that facilitate quick and efficient access to necessary information.

3. Defining roles and responsibilities

Defining the roles and responsibilities of all parties involved in data flow in a precise and clear manner, thereby enhancing coordination, preventing duplication of efforts, and increasing the effectiveness of data management.

4. Simplify administrative procedures

Work to simplify the administrative procedures associated with data exchange so that civil society organisations in the Gaza Strip can access information more quickly and smoothly.

5. Review and evaluate existing restrictions

Conduct a comprehensive periodic review of restrictions and obstacles that hinder data flow, especially those related to political, security and logistical factors, while developing practical strategies to mitigate them and ensure the continued flow of information.

6. Enhancing transparency

Emphasise the need to enhance transparency in the management and distribution of humanitarian aid by publishing clear and detailed periodic reports on distribution mechanisms and resource use, and disseminating these reports through information portals such as the Palestinian NGO Network to ensure that all stakeholders are informed.

7. Launching a comprehensive national dialogue

Calling for a multilateral national dialogue in the Gaza Strip to discuss data flow policies and mechanisms, thereby contributing to enhancing mutual understanding and developing policies that are more in line with the local context.

8. Develop effective complaint mechanisms

Clear and fair mechanisms should be developed to enable beneficiaries to submit and follow up on complaints in a reliable and effective manner, thereby strengthening the capacity of civil society organisations to hold parties involved in humanitarian aid management accountable.

9. Review spending priorities

The study recommends that international actors working in the Gaza Strip reconsider their spending priorities to strike a balance between providing direct humanitarian aid and allocating sufficient resources to build the capacity of organisations to collect and analyse the data needed to ensure that aid reaches its intended recipients and to reduce opportunities for corruption.

10. Capacity building and training

There is a need to launch ongoing training programmes targeting civil society organisation staff in the Gaza Strip, with the aim of developing their skills in the area of aid tracking and monitoring and analysing relevant data, to ensure improved performance and accountability.

11. Implementing initiatives that promote trust

Calling for the adoption of clear and transparent initiatives to promote mutual trust between civil society organisations and international actors, through the organisation of regular meetings to discuss challenges and opportunities and exchange experiences and expertise.

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 civil society organizations working in the field of democracy, human rights and good governance. In 2006, the Coalition was accredited as a national chapter for Transparency International.

AMAN is a Palestinian think tank and a specialized body providing knowledge on corruption at the local and regional level through producing specialized reports and studies. The periodic publications include: The annual Integrity and Anti-Corruption Report, the annual Palestinian Integrity Index and the National Integrity System studies and reports, in addition to the Coalition's continued contributions to produce reports and studies on the status of corruption in the Arab region.

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

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