



Integrity Index in the Palestinian Security Sector "Fourth Report"

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Integrity Index in the Palestinian Security Sector

"Fourth Report"

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Executive Summary

The integrity index of the Palestinian security sector is a periodic assessment of the security sector's immunity against corruption and the opportunities for corruption. The "Integrity Index of the Palestinian security sector" is an effort to quantify the extent of the immunity of the integrity system in the security sector.

The analysis of the indicators results provides an overview of the key findings (strengths, weaknesses, limitations, and obstacles) with recommendations to be considered with other tools to help the state's public administration adopt initiatives and set priorities in the national strategies for the promotion of integrity and anti-corruption efforts. The Index covers eight indicators chosen for their effectiveness in assessing the immunity and the prevention of corruption in the security sector in Palestine.

The index aims to help public institutions to develop realistic plans for the prevention of corruption and efficient investment of available resources to upgrade the performance of security institutions. It also pinpoints the risks affecting the governance of the security sectors and proposes remedies. The security sector is among the most important public sectors of a state. It needs to apply integrity, transparency, and accountability in its work because of its vital role and because it is the only party entitled to use legitimate violence "weapons".

The Ministry of Interior has recently formed a team to build integrity and transparency in the Palestinian security establishment. It comprises (the Palestinian security services, the Anti-Corruption Commission (ACC), the State Administrative Audit and Control Bureau (SAACB)). The Palestinian Security establishment is publicly committed to anti-corruption measures. In the event of any specific case, appropriate measures are applied. The Palestinian security establishment is officially and publicly committed to integrity anti-corruption and the promotion of good governance, as testified by its documents including the security sectoral strategy. This represents a flagrant development. Furthermore, the Palestinian curriculum for the training on integrity and transparency in the Palestinian security establishment addresses this subject. Additionally, trainings on the code of ethics focus on reporting corruption and encouraging this reporting. However, it is still limited to the security establishment. Additional efforts are needed to promote integrity within all of the components of the security sector due to the importance of this sector in state building.

Findings of the Index Fourth Reading

The index has one main numerical value that expresses the effectiveness of the integrity system in the security sector for the period under consideration. For the period 1/1/2023 - 9/30/2024, the Security Sector Integrity Index received a "medium rating" in terms of the risks that corrupt people may exploit (62 out of 100 marks), and this score indicates that the integrity system in the Palestinian security sector is still worrying due to a set of variables that continued to negatively affect its work during the two years (2023, 2024). In general, the rating is still medium, the overall score of the index increased by one point compared to the previous reading, which shows that there was no significant change in the indicator scores or development in the ratings of the fields, sectors and pillars / compared to their scores in the previous reading.

The detailed results of the seventy-five indicators in the Index indicate a wide disparity in the scores obtained by all indicators. While twenty-nine indicators received a score of 100, the highest possible score, fifteen indicators received a score of zero, the lowest possible score. Thirty-eight (52% of all indicators) of the seventy-five indicators scored in the critical or low categories (i.e., 50 and below). On the other hand, 37 indicators (48.75% of all indicators) received scores in the Advanced and Very Advanced categories.

Index scores by thematic area without the external environment indicators

The overall score of the Security Sector Integrity Index when not including the results of indicators related to the external environment (indicators related to legislative oversight of the security sector, approval of the public budget and information about it), which is not the work of the security services but rather a guarantor of the effectiveness of the integrity system in the security sector, shows an increase of 7 points. While the Security Sector Integrity Index scored 62 out of 100 when the 75 indicators are included, the same barometer, without the results of the indicators related to the absence of the role of the legislative council and the lack of transparency of the public budget, scored 69 out of 100, a difference of seven points (an advanced rating).

It is clear that the absence of the Legislative Council as a result of the failure to hold general elections, and the weakness of the public budget database and detailed data on security institutions, agencies, and procurement on the Ministry of Finance's website, which is related to the transparency of the government's work in general, affected the score of the Security Sector Integrity Index.

Comparison of the four readings

Index score in the four readings

Reading	Year	Score
Score of General Index, First Rading	2018	56
Score of General Index, Second Rading	2020	55
Score of General Index, Third Rading	2022	61
Score of General Index, Fourth Rading	2024	62

The results of the fourth reading of the report showed an increase in the average score in each of the two areas (procurement and tendering, and recruitment and employee behavior), while there was a decrease in the average score in the following areas (political will, security sector budget, and intelligence agency oversight).

Average Index Score Ratings for the Areas of Integrity in the Security Sector

No.	Areas	Average score per area, First Reading	Average score per area, Second Reading	Average score per area, Third Reading	Average score per area, Fourth Reading
1.	Political Will	37	39	46	44
2.	Security Sector Budget	45	34	50	43
3.	Procurement and bids	75	80	78	79
4.	Recruitment and Employee Behavior	72	67	73	86
5.	Oversight of Intelligence Services	37	35	38	29
Total		56	55	61	62

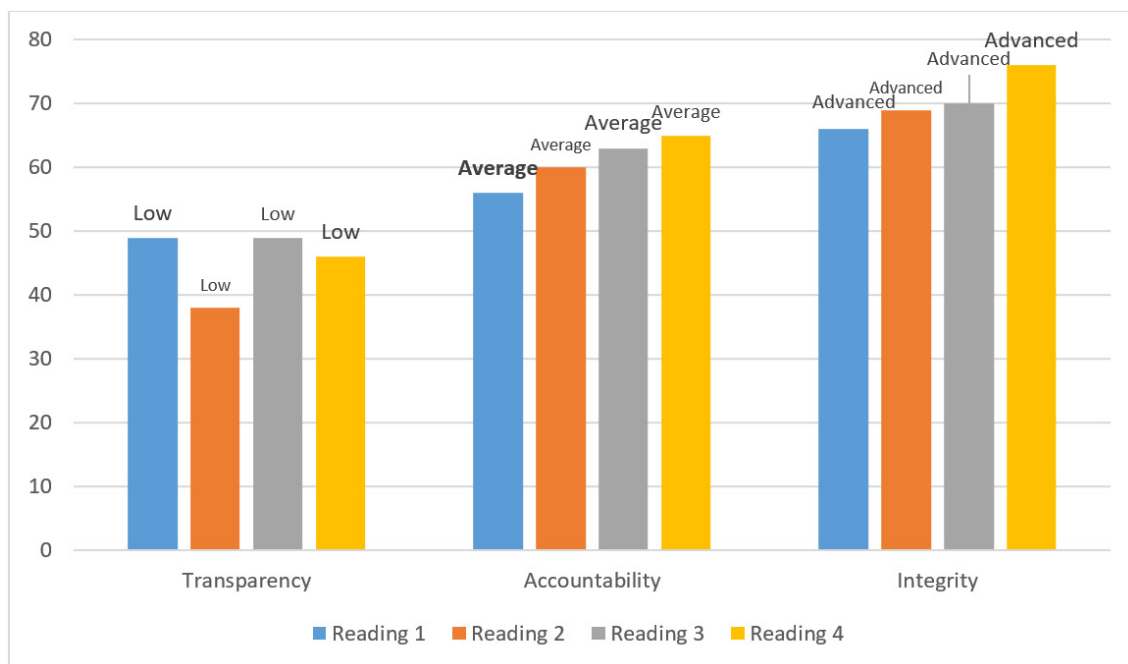
The results of the third reading, according to the sub-indicators of the Legislation and Practices sectors, indicate that the Legislation sector received an "advanced" rating, which is the same as the rating of the previous three readings. In contrast, the Practices sector received an "average" rating, after having been rated "low" in the previous two readings.

Comparison of Average Index Score for Legislations and Practices Sectors



In spite of the improvement in the average scores for the integrity pillar, the integrity system pillars' sub-ratings and ratings remained unchanged in the three readings. The Integrity pillar maintained an "advanced" rating, followed by the accountability pillar with an "average" rating and then the transparency pillar with a "low" rating.

Average Index Score per Pillars of Integrity in the three readings



The key negative factors undermining the integrity system in the security sector during this period are:

(1) Absence of the legislative council, which paralyzed parliamentary oversight, including of security agencies and the discussion of security policies as well as approval of the general budget, including the security sector's budget and oversight of public fund expenditure; (2) Lack of an independent (parliamentary or governmental) commission vested with oversight of intelligence services and their administration and budgets; (3) The Law on the exercise of the right to access public information and easy access and cooperation thereof is still not enacted; (4) consultation with the public on security sector policy and security strategy remain weak and irregular; (5) insufficient details and information are available on the different phases of security sector budget preparation before it is enacted. Information on the security sector is not shared with citizens, the media and civil society in a timely manner or during implementation; (6) Lack of an information classification system in conformity with the law to ensure the protection of information.

In contrast, the key positive factors that promote the integrity system in the security sector include:

1) a code of conduct, which is circulated to security personnel and is available to the public, is in place. (2) There is a clear process for the budget planning cycle and independent budget planning departments. (3) Procurement legislation guides officials to avoid corruption-related issues. Officials involved in the design of tender specifications or involved in tender board decisions are subject to it. (4) Security sector procurement legislation is applied with acceptable effectiveness, and the security sector procurement oversight body is independent. (5) Formal mechanisms exist to allow companies to file objections or complaints about procurement malpractice. (6) There are specific penalties in the law for corruption offenses, all breaches of contracts with suppliers are adequately addressed, and the penalties in the law are clear about penalizing any supplier who commits an act of corruption.

Findings and Recommendations:

• Findings:

The periodic Integrity Index of the Palestinian security sector monitors (the changes in the immunity system of the security sector and its effectiveness in preventing the risks of corruption. It applies to (80) indicators that govern the sector's work, areas, pillars, legislation and current practices. These include the level of compliance with a set of values that govern the work of the officials responsible for combatting corruption and safeguarding public funds. The Index also assesses the level of observance of the bases and principles of transparency in their work and evaluates the effectiveness of the systems that hold them to accounts.

I. General Findings:

1. The Integrity Index in the Palestinian Security Sector scored average, indicating that corruption risks or "opportunities" are still possible. The integrity system in the Palestinian security sector is at the inception phase, requiring further steps to fulfill conditions for building an effective integrity system in this sector.

2. The index results showed that the major challenge to the integrity system in the Palestinian security sector lies in practices, which scored lower than regulations. Characterized as either short or ineffective, the latter were still rated as advanced.

3. It was clearly shown that the most significant challenge was posed by two aspects: (1) inadequate tools of oversight of Intelligence agencies, and (2) weak political will. Crucially, an inactive PLC has greatly impacted scores of the Integrity Index in the Palestinian Security Sector. By contrast, procurements and tenders, and recruitment and personnel conduct, were rated as advanced. Specialized and internal government units provide oversight mechanisms and techniques. The security establishment also demonstrates a will to improve security personnel's performance.

4. The index showed that regulations were generally available. However, there is a distinct lack in regulations on oversight of Intelligence agencies, resulting in unclear mechanisms that help to consider how appropriate candidates are to command these agencies. Also lacking are regulations on the promotion of transparency given that a law on the right of access to information and a regulation on document classification have not so far been enacted. These legislative acts should outline mechanisms for accessing information and documents kept by security agencies and government bodies. They also set the prescribed duration for public disclosure of information.

5. Ratings showed that the indicators of transparency were the weakest in all three pillars of the integrity system in the security sector. While accountability and integrity were rated as "average", transparency scored low.

II. Detailed Findings

1. Some Palestinian regulations inadequately provide for immunizing the integrity system with- in the Palestinian security sector, e.g. the right of access to information.

2. According to the index results, oversight bodies' role is undermined by inactive PLC due to the internal Palestinian political divide. As a result, parliamentary oversight of the security sector has been debilitated, clearly impacting political will, practices, and accountability.

Of the 11 indicators of the PLC powers of control over the security sector, nine were rated as critical because of a dysfunctional parliamentary process. These nine indicators account for some 11 percent of the total index weight.

3. Indicators of transparency continue to be weak. For example, regular public consultations on the security sector policy and security strategy do not take place. Lack of dissemination of detailed information about the security sector budget before its enactment. The right to access updated information and documents about the security sector policy and security strategy is weak. The share of undisclosed items of the budget of intelligence services (General Intelligence Service and Preventive Security Forces).

4. Due to the government's non-disclosure of the budget, several indicators score dropped to "critical rating". These include the indicators related to public disclosure of detailed and clear budget before its enactment. The majority of the approved security sector budget is shared fully with the media and civil society actors.

5. An information classification system is not established in consistence with the law to ensure protection of information and allow the publication of documents. A few details are provided about the security sector budget before it is enacted.

6. Candidates' fitness for the job is not assessed by an external committee like the governance integrity committee.

7. A specialized, independent governmental committee (e.g. National Security Council) is in place to control policies, management and budget allocations to Intelligence agencies.

8. Compliance departments and their units "Internal Control Services" need more attention and be provided with the necessary financial and human resources and autonomy to achieve the purpose of their establishment.

9. Despite the improvement in the last two readings, managing corruption risks in the security sector still requires further review of the challenging environment that enables corruption in the security sector, and conducting such assessments periodically, to utilize the results of the integrity assessment in new policies and planning, especially when preparing the national security sector strategy.

10. There has been a noticeable improvement in the current reading on the evidence of security sector institutions practicing openness towards civil society organizations in the area of policy discussion. It is necessary to open up to civil society organizations, especially in the absence of the Legislative Council, as the legislation issued and published in the Official Gazette still does not cover all procurement related to the security sector. It also needs to develop a manual of procedures for public procurement and tenders in the security sector.

11. Procurement in the security sector should disclose more details on purchases and publish procurement data in an accessible form, including the changes made after the award of a bid.

12. The security sector budget provides limited information on the expenditure. The majority of the approved public sector budget is not shared with the media or civil society actors.

13. The SAACB continues to restrain publication of results of security sector audits. The Bureau only releases a summary of its operations within security sector institutions in the SAACB annual report.

14. The size of the allowances, travel missions, and financial allocations to certain civil and military staff is minimally publicized or publicly accessible.

15. Despite administrative development (approving structures and developing job descriptions for each position), the criteria for appointing security personnel to supervisory and senior positions, such as heads of military agencies and bodies, are still limited, especially since they are conducted without any evaluation processes based on objective criteria from an external committee, or publicizing the criteria by which people are selected for these positions. Partisan favoritism remains influential despite attempts to separate the security services from political organizations.

• Recommendations

To enhance the immunity of the Palestinian Political System, including the security sector's integrity system and effectiveness, joint efforts and strong pressure are necessary for board mobilization to end the political split and organize general elections with the participation of all political parties. The intuitions of the Palestinian Political System should unite to address the gaps highlighted in this index.

Political level

1. Although it's difficult to hold general elections due to the ongoing war in Gaa, and the need to prioritize ceasefire and addressing the devastating impacts on the Palestinian citizens in Gaza, political reform remains essential to reform the security sector and promote integrity. Such reform requires setting a date for general elections to enable citizens to elect their representatives in political institutions and re-activate parliamentary oversight of the executive power, including the security sector.

2. The National Security Council should be re-established as a government "body" vested with overseeing and supervising security and intelligence agencies and their administrations, budgets and hold them to account.

To the Government:

1. Promulgate the Right to Access to Information Law and the Government Document Classification System, which define the mechanisms for dealing with security and government information and documents, and the authorized time period for their release to enhance transparency in the security sector.

2. Establish a "Public Sector Governance Quality Committee" composed of experienced and impartial figures to review the appointments of candidates for senior positions (both civilian and security, including heads of security agencies and military institutions) in the public sector, according to objective criteria, and to examine the suitability of candidates for these positions.

3. Appoint an Inspector General of the Palestinian Security Forces, who reports directly to the political level, to turn the security establishment into a professional organization that is subject to oversight and inspection in the performance of its duties.

4. Publish the detailed budget, as in previous years, so that civil society watchdogs can monitor expenditures on the security sector, and their size, within the general budget.

5. Issue a special financial regulation for the security establishment and publish it in the Official Gazette instead of maintaining the unpublished exceptional financial regulation, which is renewed annually by the Minister of Finance.

6. Issuing the special regulation for procurement of a security nature stipulated in the Public Procurement Law, which covers all procurement related to the security sector, and preparing a procedures manual for public procurement and tenders in the security sector.

To the Ministry of Interior

1. Establish a risk management and compliance unit in the security sector, review the challenging environment that enables corruption in the security sector, examine the management of corruption risks in the security sector, and conduct periodic assessments to utilize the results of the assessment in the planning and policies of Palestinian security sector agencies and institutions.

2. Expand regular consultations with the public on security policy and strategy.

To the Security Agencies and Supporting Military Bodies

1. Issuing annual reports that include achievements, challenges, and the extent to which members of the security services comply with the law and the code of ethical behavior.

2. Strengthen the capacities of compliance departments and its units “internal control and inspection departments in security sector organizations” by providing qualified human resources, the necessary financial resources, and enhancing their independence, by subordinating them to the Minister of Interior/Inspector General in the Ministry of Interior to achieve the purpose of their establishment.

3. Enhance the transparency of procurement processes in the security sector by publishing procurement data in an accessible format and making all contracts available to the public, including amendments after the awarding of tenders.

4. Provide details of the security sector budget before it is approved. Provide information on the approved security sector budget to the media and civil society actors, as well as clearly publicize the size of special allowances for civilian and security personnel.

5. Openness of the centralized financial administration (the military and the Ministry of Finance) to provide information requested by citizens, the media, and civil society on the security sector's budget in a timely manner.

Preface

Many statistical and non-statistical indices are used worldwide to assess corruption and anticorruption effort in general, or an index assess a certain sector or a public institution in particular¹. For example, Transparency International (TI) issues three relevant reports, the most known amongst them are:

- Published on an annual basis, the Corruption Perception Index (CPI) gauges corruption perceptions across some 180 countries. The CPI relies on a number of specialists' opinions as well as on views of select individuals with practical experience from target countries, such as businesspeople with direct contact with the public sector. In addition, the CPI is informed by a set of reports and studies of various sources. Information is processed and standardized using a scale of 0 to 10 to reflect the level of freedom from corruption in the country under assessment.
- The Bribe Payers Index (BPI) helps to identify the perceptions of managers concerning bribes paid by foreign companies in countries under survey.
- Also issued by TI, the Global Corruption Barometer (GCB) measures citizens' perceptions of the most corrupt sectors in the country and their predictions of expected levels of corruption in the future. The GCB includes an assessment of the government's efforts in the fight against corruption.
- Since 2013, TI UK Defense and Security Program has published the Government Defense Anti-Corruption Index (GI). This index is based on 76 indicators and sub-indicators to measure levels of corruption risk in national defense and security institutions.

In Palestine, since 2011, the Coalition for Accountability and Integrity (AMAN) has developed the Integrity System Index in Palestine. The index measures the immunity of state institutions against corruption, using 80 indicators to calculate index scores. Indicators cover multiple categories to assess developments in the pillars of integrity and other various sectors.

As part of AMAN coalition's effort to develop guides and also to support its work, especially in the sector in general, and serve the objectives of the Civil Society Forum for the promotion of good Governance in the security sector, and as part of its role as the Forum's technical and administrative secretariate, it decided to produce a dedicated periodic index for the security sector, namely the Integrity index in the Security Sector in Palestine. The index assesses the level of immunity of security establishments against corruption. It enables government bodies and civil society organizations to assess risks and explore opportunities to slide into corrupt practices. The index depends on 80 indicators to measure the index scores over the period under consideration (2024).

The team faced several challenges in the preparation of the report, mainly the inability to carry out public opinion polls in the West Bank and Gaza Strip because of the genocidal war against our people in the Gaza Strip. For this reason, the research team suspended the poll-dependent indicators.

¹ For more, see: "Corruption Index in Arab Countries: Problems of Measurement and Methodology," Beirut: Arab Anti-Corruption Organization, Arab Democracy Foundation, 2010.

Introduction

The Integrity Index in the Palestinian Security Sector provides a periodic description of risks of corruption and immunity of the security sector against corruption. The Index quantifies the level of immunity against corruption in the security sector.

The present analysis of indicator results provides an explanation of key findings (strengths, weaknesses, limitations and obstacles). Recommendations are derived accordingly. Together with other tools and means, these recommendations will help the Public Administration of the State to take initiatives and prioritize national strategies towards promoting governance, in general, and fostering integrity and combatting corruption, in particular, in the security sector.

The Ministry of Interior (MoI) has recently formed a team to promote integrity and transparency in the Palestinian security sector. The team comprises Palestinian security agencies, the Anti-Corruption Commission (ACC), and the State Administrative Audit and Control Bureau (SAACB).

The Palestinian security establishment is publicly committed to anti-corruption measures, and in the event of specific cases, appropriate action is taken. Documents of the security establishment demonstrate a clear orientation towards integrity, anti-corruption, and promotion of good governance. For example, the security sector's strategy represents a flagrant development.

The Palestinian Integrity and Transparency Training Curriculum for the Palestinian Security establishment has been approved and addresses this topic.

In addition, corruption reporting and encouraging reporting is part of the training on the code of conduct, but the training is still limited, and further efforts are needed to promote a culture of integrity across all security agencies due to the sector's importance for state-building.

This report comprises three sections. Section (1) highlights the report preparation methodology; Section (2) quantifies the results of the Integrity Index in the Palestinian security sector in the reporting year; Section (3) includes a detailed summary of all the Integrity Index indicators by thematic areas.

The Integrity Index in the Palestinian Security Sector aims at achieving multiple goals, first and foremost:

1. Presenting detailed information and understanding to the government, security agencies, civil society organizations, and citizens of aspects of the integrity system in the Palestinian security sector.
2. Based on the first goal, various stakeholders, including civil society organizations and activists, will be able to join forces with relevant authorities and contribute to changing and improving the integrity system, avoid flaws exhibited by the Integrity Index, and facilitate identification of the concerned agencies or areas in line with the recommendations on instruments and mechanisms for corruption prevention.

The Ministry of Interior (MOI), which supervises a large part of the security sector, expressed its willingness to instruct the heads of security agencies to cooperate in identifying the weaknesses in the integrity and anti-corruption system, especially in areas within the mandate of the security establishment and not the political level.

Legal and institutional terms of reference of the security sector in Palestine

The legal framework of security forces in the State of Palestine

The Palestinian Basic Law defines the role of the parties responsible for managing the security sector. It grants the President of the National Authority the position of supreme commander of the Palestinian security forces, without clarifying the tasks that this entails or the powers to implement them specifically or categorically when it defines the President's tasks in Articles 40-45, and gives the Council of Ministers the responsibility of managing security agencies, institutions and bodies responsible for maintaining public order and internal security. In practice, some laws and decrees establishing some of these agencies specify the body supervised by the president, such as the General Intelligence Service.

The Basic Law defines security forces and police as “regular forces. They are the country’s armed forces. Their functions are limited to defending the country, serving the people, protecting society, and maintaining public order, security, and public morals. They shall perform their duties within the limits prescribed by law, with complete respect for rights and freedoms”². These laws include:

- Decree Law No. 7 of 2024 amending the Security Forces Service Law and its amendments. The most prominent amendments were the addition of the Presidential Guard to the security forces, making four security forces (the National Security Forces (NSF), the Palestine Liberation Army, the Internal Security Forces, the General Intelligence and the Presidential Guard). The amendment also authorized the creation of several bodies and directorates that may be independent of the four components in their work and dependencies, to be organized by a regulation issued by the Supreme Commander of the Palestinian Security Forces (Article 4). Article 7 grants intelligence services independence from the NSF in terms of supervision and follow-up, with the head of intelligence reporting directly to the Supreme Commander. The law stipulates many provisions that regulate the administration of the work of the security services, such as defining the rights and duties of security force members, the activities that officers and members are prohibited from performing, appointment and promotion procedures, and the term of office of the head of security agencies, among others.
- The Law on General Intelligence No. 17 of 2005 sets forth the competencies of General Intelligence, the term of office for the Head of General Intelligence, acts prohibited for General Intelligence personnel, and approval of the General Intelligence budget. The Law explicitly vests the Palestinian Legislative Council (PLC) with the power to hold the Head of the General Intelligence to account through relevant PLC committees. It also provides for subjecting the General Intelligence budget to PLC oversight. To this effect, the Law provides for the establishment of a committee to audit the General Intelligence budget.
- The Law on Civil Defense No. 3 of 1998 regulates the competencies of the Civil Defense and provides that the Director of the agency is answerable to the Minister of Interior.
- The Law by Decree No. 11 of 2007 on Preventive Security Agency provides that Preventive Security Agency is a regular security directorate general within the Internal Security Forces. In addition to setting its powers and competencies, the Law by Decree defines the appointment procedures for the Director General, Deputy Director General, and Assistants to the Director General of the agency.

² Article 84 of the Amended Basic Law

It prescribes that the Minister of Interior submit a report on the Preventive Security operations to the PNA's President and Prime Minister. However, the Basic Law decisively provides that those ministers, including the Minister of Interior, are answerable to the PLC. In addition to voting on motions of confidence or no-confidence, the PLC holds ministers to account. Reports will also be submitted to the PLC and PLC committees.

- The Customs Police Law No. 2 of 2016 recognizes the Customs Police as a regular department within the Internal Security Forces, defines its powers and competencies, and grants it the status of a judicial police force, reporting to the Council of Ministers.
- Decree Law No. 23 of 2017 on the Police, which regulates police affairs, work, powers, and specialties. This law governs the affairs of the police, their work, powers, and mandate. It also outlines procedures for appointing the director-general of the agency, his deputy, and his assistants. The appointment of the Director General of the Police violated the Security Forces Service Law No. 8 of 2005, which made the appointment of the Director General of the Police the prerogative of the Minister of Interior, while the Decree Law made the appointment of the Director General of the Police a decision of the President.
- Decree Law on the Palestinian Military Justice Commission No. 2 of 2018, which regulates the formation of the Security Forces Judicial Authority Council, the work and jurisdiction of the military judiciary, the military courts and their levels, and the work of the military prosecution.
- The Palestinian Security Forces Insurance and Pensions Law No. 16 of 2004 applies to members of the Security Forces aged 45 years and above at the time of its issuance and gives workers incentives to retire, and the Retirement Law No. (7) of 2005 and its amendments, which enables Security Forces personnel to obtain early retirement.
- The Anti-Corruption Law, the State Administrative Audit and Control Bureau Law, and the General Budget Law. Security apparatuses and their employees are subject to the provisions of these laws. Some presidential decrees regulate certain aspects of the security forces, including Decree No. 33 of 2007 on reorganizing the finances and salaries of security force personnel, Decree No. 288 of 2007 on forming committees to match security force members with qualification requirements, decrees on the formation and dissolution of the National Security Council, and Presidential Decree No. 12 of 2002 attaching the police, preventive security, and civil defense forces to the Ministry of Interior.

Security Sector's Institutional Framework

The Palestinian security forces consist of the following security agencies:

- **National Security Forces (NSF):** Resembling an army in an independent State, the NSF are a “regular military body” that includes naval police, air force, and a number of military brigades deployed throughout the PNA-controlled territory. The NSF performs its functions under the leadership of the NSF Commander. No legal provisions govern the NSF powers and tasks. In practice, the NSF assists other security agencies in keeping public order and security.
- **Military Intelligence:** Established in 1994, the Military Intelligence is one component of the Palestinian security system. According to the Minister of Interior's Decision No. 707 of 2007, dated 17 August 2007, the Military Intelligence personnel are vested with judicial duties within the Palestinian security forces. The Director General of Military Intelligence reports to the Minister of

Interior³, and NSF's Commander-in-chief. In 2014, presidential decree No. 34 was enacted to grant the military intelligence services the status of judicial police.

- **Presidential Guard:** After the late President Yasser Arafat returned to Palestine, the Presidential Guard was established as a military agency comprising a group of officers who were administratively included in the so-called President's Companions. After President Mahmoud Abbas came to power, the Presidential Guard was expanded to include military units, which supported other security forces in carrying out security duties and maintaining security. The Presidential Guard protects the PNA President, presidential compounds, senior officials, and official delegations to the Palestinian territory⁴. No law governs the operations and relations of the Presidential Guard. It is unclear whether the force submits reports on its operations.

- **Internal Security Forces:** Reporting to the PNA President, the Internal Security is a regular security body, which includes the Police, Preventive Security, and Civil Defense⁵, and Customs Police⁶. The four agencies perform their functions under the presidency of the Minister of Interior, whereby each agency is directly subordinated to the Minister.

- **General Intelligence:** Reporting to the President, the General Intelligence is an independent regular security body, which performs its functions and exercises its competence under the presidency and command of its head, who also makes the decisions necessary for the management of its work and regulation of its affairs⁷. It is considered as an external intelligence agency, whose internal activity is limited to completing the measures and activities it commenced abroad⁸. The General Intelligence takes the measures necessary to prevent acts that may endanger the security and safety of Palestine. It reveals external dangers that may jeopardize the Palestinian national security in the fields of espionage, collusion and sabotage.

Support units:

Several other bodies and institutions provide support to security agencies. They report either to the PNA President or the Minister of Interior. Key support units include (1) Organization and Management Commission; (2) Supplies and Equipment Commission; (3) Central Military Financial Administration, (4) Military Medical Services, (5) Political and National Guidance Commission, and (6) Military Training Commission. The majority of these units lack the legal terms of reference that should govern their functions and define their competencies.

³ Intelligence website: <http://www.pmi.pna.psl/>

⁴ Presidential Guard website" <http://spg.ps/ar>

⁵ Article (3) of the Palestinian Security Forces Service Law No. 8 of 2005

⁶ Article (1) of Law No. 2 of 2016 on the Customs Police.

⁷ Article 13 of the Palestinian Security Forces Service Law.

⁸ Article 8 of the General Intelligence Law.

Methodology

I. Adopt indicators of the Integrity Index in the Palestinian Security Sector

• The work team consists of local experts, AMAN staff, and members of the Civil Forum for Promoting Good Governance in the Security Sector. Relating to the integrity system in the security sector, a number of indicators have been selected on the basis of relevant local and international terms of reference on the promotion of integrity and prevention of corruption. These mainly include provisions of Palestinian regulations. Some international indicators, including TI UK's Government Defense Anti-Corruption Index, have been adapted. Several indicators have also been selected from the Palestinian Integrity Index developed by AMAN. An indicator is given 100 scores (from 0 to 100) in line with a method of calculation specific to each indicator. The indicators have been reviewed following the first report by experts from the Civil Society Forum. Some improvements were made to the Index, as shown in Annex (3).

II. Collect information from multiple sources

A variety of means helped to access the information needed for every indicator from primary sources and others, with a particular focus on security sector governance and the fight against corruption in Palestine. Ensuring the accuracy and reliability of every indicator, the main sources of information include:

1. Official state sources, such as the Council of Ministers, security agencies, military commissions, Anti-Corruption Commission, State Audit and Administrative Control Bureau, and Higher Council for Public Procurement Policies.
2. Interviews with officials and experts in the security sector in Palestine.
3. Civil society organizations that provide oversight of the security sector.
4. Palestinian public opinion polls.

III. Determine the numerical value of the index and ratings

The index has one main numerical value, which reflects how effective the integrity system in the security sector is during the period under review. It also has 80 indicators with a corresponding scale of 80 figures, each illustrating the status of every individual indicator. Ratings were also used to help reach a deeper understanding of the integrity system in all areas, sectors and pillars of the Palestinian security apparatus. Five areas that influence the security sector operations were adopted, namely, (1) political will; (2) security sector budget; (3) procurements and tenders; (4) recruitment and personnel conduct; and (5) Intelligence agencies. The political will theme includes 22 indicators, while the security sector budget has 11, and the Procurement and bidding has 21 indicators. The Recruitment and Employee Behavior theme benefits from 19 indicators, while the Intelligence Services thematic area is assessed by 7 indicators.

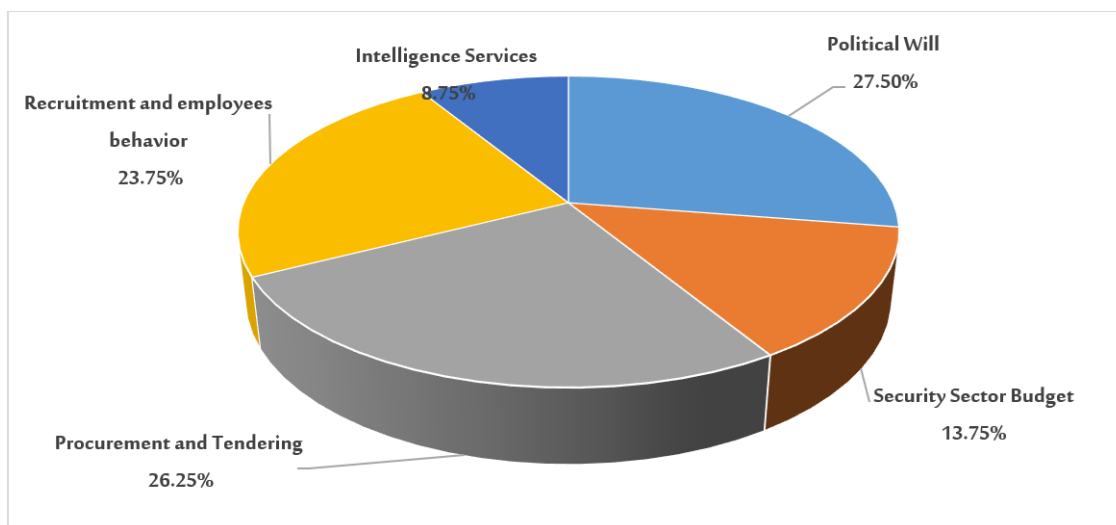
Table (1): Security Sector Thematic Areas

Thematic Area	Number of indicators	Relative weight per area
Political will	22	27.50%
Security sector budget	11	13.75%
Procurement and bidding	21	26.25%
Recruitment and employee behavior	19	23.75%
Intelligence services	7	8.75%
Total	80	100%

9 See Appendix 1 for a list of indicators used in the Security Sector Integrity Index.

In terms of index weight, Chart 1 below shows that the security sector indicators were rated as follows: political will (28 percent), procurements and tenders (26 percent), recruitment and personnel conduct (24 percent), security budget (14 percent), and Intelligence agencies (9 percent).

Chart 1: Distribution of Index Weights per Thematic Area



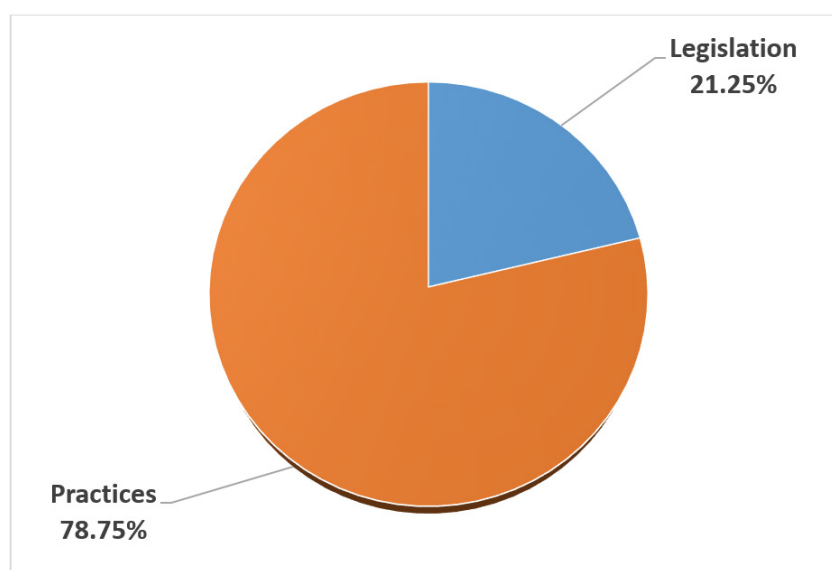
All 80 indicators were also divided into two sectors: (1) indicators of regulations and policies, and (2) indicators of practices. According to Table 2 below, there are 17 indicators of regulations and 63 indicators of practices.

Table 2: Regulations and practices

Sectors	Number of indicators	Percentage
Regulations	17	21.25%
Practices	63	78.75%

Chart 2 below shows that while indicators of regulations scored 21.25 percent, indicators of practices had a total score of 78.75 percent. Attention to practices follows from the fact that they test and correspond to the actual value of legal norms.

Chart 2: Distribution of index weights by regulations and practices



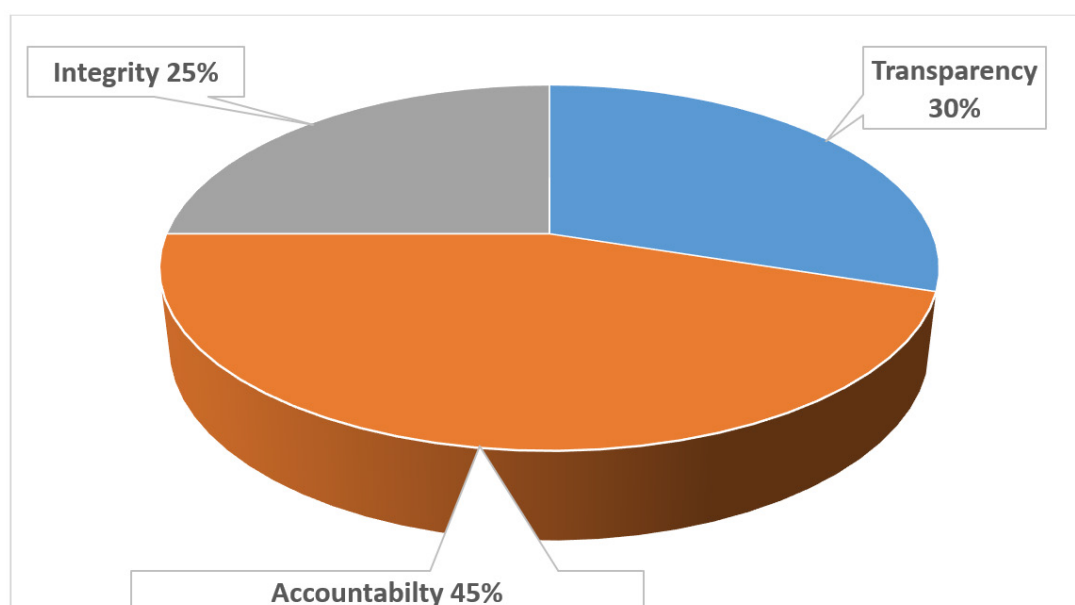
All 80 indicators were categorized into three pillars: transparency, accountability, and integrity. According to Table 3 below, indicators of these pillars of the integrity system were as follows: transparency (24), accountability (35), and integrity (21).

Table 3: Pillars of the integrity system in the security sector

Pillar	Number of indicators	Percentage
Transparency	24	30%
Accountability	36	45%
Integrity	20	25%

Chart 3 below shows indicators of transparency scored 30 percent, accountability 44 percent, and integrity 26 percent.

Chart 3: Distribution of index weights by pillars of the integrity system in the security sector



Weighting (calculating the score) of the indicators:

Indicator ratings fall on a scale of (0) to (100). This means that the selection of these indicators has successfully introduced widely different items and qualities, allowing measurement of various aspects of the integrity index in the security sector. Based on a review of the scope of these differences, ratings were classified in terms of their ability to reflect an informed view of how much an indicator would contribute to the effectiveness of the integrity system in the Palestinian security sector. This review resulted in the following classification (Table 4 below). Six levels are identified with a color code per set.

Table (4): Ratings according to the level of advancement on the integrity index in the Palestinian security sector

Code	Least Level	Highest Level	Rating
	81	100	Very Advanced
	66	80	Advanced
	51	65	Average
	36	50	Low
	21	35	Very Low
	00	20	Critical

Amendments to the fourth reading

Five indicators have been suspended, namely indicators No. 10, 19, 52, 71 and 76, as these indicators are based on information and data from the security opinion poll conducted annually by AMAN, but due to the security situation and the ongoing war in the Gaza Strip, AMAN did not carry out this survey on time, so these indicators have been suspended in the current reading.

Main features of the Integrity Index in the Palestinian Security Sector: Fourth Report (2024)

Results of the Integrity Index in the Palestinian Security Sector for 2024 show the following main features:

a. In the period (1 January 2023 – 30 September 2024), the Integrity Index in the Palestinian Security Sector¹⁰ had an “average score” in relation to potential risks exploited by corrupt individuals (62 out of 100 scores). This score indicates that the integrity system in the Palestinian security sector is still worrying due to a set of variables, which continued to negatively impact security operations throughout 2024. In general, the score remained average. The Index total score increased by one point compared to the previous reading, which does not indicate a noticeable change in the indicators’ score or any evolution in the ratings of different thematic areas/sectors/ pillars compared to the previous reading.

During the reporting period, key negative influences on the Integrity Index in the Palestinian Security Sector included:

- Continued inaction of the Palestinian Legislative Council (PLC) has crippled parliamentary oversight. The PLC has not exercised control over security agencies, deliberated security policies, enacted the public budget, including budget allocations to the security sector, or audited public expenditure.
- A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies.
- A regulation has not been approved to ensure the exercise of the right of easy access to information or cooperation to access information.
- Public consultations on the security sector policy and security strategy are neither regular nor adequate.
- Little details and information are provided about phases of the security budget formulation before enactment.
- Information requested by citizens, media outlets, and civil society on the security sector budget is not provided neither timely nor during budget execution.
- An information classification system is not established in consistence with the law with a view to ensuring protection of information.
- The government published the budget law without details regarding the security sector in 2024.

Major positive indicators of the integrity system in the Palestinian security sector were as follows:

- A code of professional conduct, which is rolled out to security personnel and made available to the public, is in place.
- There is a clearly defined process of the budget planning cycle. Budget planning departments are established and independent.
- Procurement regulations instruct officials to avoid instances of corruption. Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to oversight.
- Enforcement of procurement regulations within the security sector is adequately effective. The agency in charge of audit of procurements in the security sector is independent.

¹⁰ The geographic scope of the information collected for this report covers PA institutions in the West Bank and does not include PA institutions in the Gaza Strip.

- Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process.
- Specific penalties are prescribed by law for corruption offences. Adequate action is taken against all violations of the contracts concluded with suppliers. Legally prescribed penalties are clear, providing for punishing any supplier who commits an act of corruption.

b. Indicators with a “critical” score (0-20): fifteen indicators (20 percent of all indicators) were rated as critical. These involved main aspects, namely:

1. Effective PLC oversight of security agencies
2. The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector
3. Annual audit reports on security agencies are submitted to the PLC
4. The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB
5. Right of access to updated documents and information on the security sector policy or security strategy is safeguarded
6. The security policy or security strategy is deliberated by the PLC
7. PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector
8. The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs.
9. The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures
10. The security sector budget is publicly available, disaggregated and clearly defined before it is enacted
11. The greatest portion of the enacted security sector budget is fully disclosed to the media and civil society actors
12. Officials regularly produce audit compliance reports on contracts and achievements
13. A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies
14. An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates
15. The proportion of discreet expenditures earmarked to Intelligence agencies (General Intelligence and Preventive Security services)

c. The nature of the indicators that received scores that place them in the “Low” category (36-50): Twenty-three indicators (31% of the total indicators) received a “Low” rating. These indicators related to the following topics:

1. There is serious oversight of the performance of the security services in the West Bank from official oversight institutions in Palestine.
2. There are indications that security institutions are open to civil society organizations.
3. The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector.
4. The anti-corruption policy is reflected in the security sector’s plan of action. Implementation makes progress in line with the set timeframe.
5. Needed financial and human resources are made available at compliance departments and units.

6. Compliance departments and units are independent.
7. Challenges that furnish an opportunity for corruption in the security sector are reviewed.
8. Assessments of risks of corruption are provided on a regular basis.
9. The security sector budget includes comprehensive and detailed information on expenditures according to respective functions.
10. Information requested by citizens, media outlets, and civil society on the security sector budget is provided in a timely fashion.
11. The SAACB regularly audits the security sector spending and evaluates the security sector performance.
12. Findings of the SAACB audit reports on security agencies are published.
13. Legislation is in place, covering all procurements of the security sector without exception.
14. Details of all procurements are available.
15. Data on procurements are published, usually in an accessible format.
16. All contracts, including modifications after tenders are awarded, are publicly accessible.
17. Cases of corruption in procurements are investigated and offenders are put on trial without any undue political influence.
18. The number of civil servants and security personnel is accurately known and publicly available.
19. Allowances paid to civil servants and security personnel are published and accessed by the public.
20. A policy is in place to announce results of the trials of security personnel.
21. Results of trials are made publicly available.
22. Recruitment in senior positions at the Intelligence service is affected by favoritism.
23. An information classification system is established in consistence with the law with a view to ensuring protection of information.

d. Nature of indicators rated “Advanced” (66-80): Eight (17.5%) of the seventy-five indicators received an Advanced rating. These indicators related to the following topics:

1. Compliance units within the security sector are effective.
2. An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions.
3. A procedure manual on public procurements and tenders is in place.
4. The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases.
5. Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits.
6. The security sector has faced the problem of ghost employees over the past five years.
7. The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria.
8. The oversight of Intelligence agencies’ activities, management and budget allocations is effective.

e. Nature of indicators rated “Very Advanced” (81-100): Twenty-nine indicators (39%) received a “Very Advanced” rating, related to the following topics:

1. Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment.
2. A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders.
3. Civil society organizations and research centers discuss the issues of integrity, transparency and corruption within the security sector.
4. New policies and plans are informed by findings of the integrity assessment.

5. A clearly defined process of the budget planning cycle is in place. Budget planning departments are established and independent.
6. The recommendations issued by SAACB are utilized.
7. Regulations on procurement bodies stipulate a full understanding of the cases of corruption.
8. Regulations on security sector procurements are enforced effectively.
9. The oversight body for security sector procurements is independent.
10. Oversight of security sector procurements is efficient.
11. Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest.
12. A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications.
13. Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported.
14. Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported.
15. Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process.
16. Mechanisms for filing challenges and complaints by companies are effective and systematically used.
17. Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption.
18. The security sector allows public access to information on the number of civil servants and security personnel.
19. The size of the wage bill of civil servants and security personnel is made publicly available.
20. Staff receive their salaries on time.
21. The payment system is well-prepared, regular and public.
22. Salaries and increments are publicly accessible.
23. In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures.
24. In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures.
25. There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals.
26. Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers.
27. A code of professional conduct is applicable.
28. The code of professional conduct is disseminated to security personnel and is publicly available.
29. Security personnel and civil servants receive anti-corruption training.

● Detailed index results by indicators

Detailed results of all 75 indicators show a significant variation of the ratings of each. While 29 indicators scored 100, the highest score given to an indicator, 15 indicators were rated as 0, the lowest score of an indicator. Additionally, 38 (or 52 percent) of all 75 indicators had scores on a rating scale ranging from (critical, very low to low; i.e. a score of 50 or less). On the other hand, 37 (or 48.75 percent) of all indicators obtained scores on a rating scale ranging from (advanced to very advanced).

The table below provides a list of index indicators, sub-indicators, and ratings of each. For a detailed account of the rating and source of each indicator, see Annex 2 below.

Table (5): Scale indicators by domains, sectors, pillars and ratings obtained in the first reading

#	Indicator	Area	Sector	Pillars of integrity	Rating
1	Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment	Political will	Regulations	Accountability	Very Advanced
2	Effective PLC oversight of security agencies	Political will	Practices	Accountability	Critical
3	The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector	Political will	Practices	Accountability	Critical
4	A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders	Political will	Regulations	Accountability	Very Advanced
5	Official oversight bodies diligently monitor the performance of security agencies in the West Bank.	Political will	Practices	Accountability	Low
6	Annual audit reports on security agencies are submitted to the PLC	Political will	Practices	Accountability	Critical
7	The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB	Political will	Practices	Accountability	Critical
8	The security policy or security strategy is deliberated by the PLC	Political will	Practices	Accountability	Critical
9	PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector	Political will	Practices	Transparency	Critical

10	Regular consultations on the security sector policy and security strategy take place with the public	Political will	Practices	Transparency	
11	Right of access to updated documents and information on the security sector policy or security strategy is safeguarded	Political will	Practices	Transparency	Critical
12	There are indications that security institutions are open to civil society organizations	Political will	Practices	Transparency	Low
13	Civil society organizations and research centers discuss the issues of integrity, transparency and corruption within the security sector	Political will	Regulations	Accountability	Very Advanced
14	The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector	Political will	Regulations	Integrity	Low
15	The anti-corruption policy is reflected in the security sector's plan of action. Implementation makes progress in line with the set timeframe	Political will	Practices	Integrity	Low
16	Needed financial and human resources are made available at compliance departments and units	Political will	Practices	Integrity	Low
17	Compliance departments and units are independent	Political will	Practices	Integrity	Low
18	Compliance units within the security sector are effective	Political will	Practices	Accountability	Advanced
19	The public are confident that security officials are seriously willing to combat corruption	Political will	Practices	Accountability	
20	Challenges that furnish an opportunity for corruption in the security sector are reviewed	Political will	Practices	Accountability	Low
21	Assessments of risks of corruption are provided on a regular basis	Political will	Practices	Accountability	Low
22	New policies and plans are informed by findings of the integrity assessment	Political will	Practices	Accountability	Very Advanced
23	A clearly defined process of the budget planning cycle is in place. Budget planning departments are established and independent	Security Sector Budgets	Regulations	Transparency	Very Advanced
24	The security sector budget includes comprehensive and detailed information on expenditures according to respective functions	Security Sector Budgets	Practices	Transparency	Low

25	The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs	Security Sector Budgets	Practices	Accountability	Critical
26	The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures	Security Sector Budgets	Practices	Accountability	Critical
27	The security sector budget is publicly available, disaggregated and clearly defined before it is enacted	Security Sector Budgets	Practices	Transparency	Critical
28	The greatest portion of the enacted security sector budget is fully disclosed to the media and civil society actors	Security Sector Budgets	Practices	Transparency	Critical
29	Information requested by citizens, media outlets, and civil society on the security sector budget is provided in a timely fashion	Security Sector Budgets	Practices	Transparency	Low
30	An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions	Security Sector Budgets	Practices	Accountability	Advanced
31	The SAACB regularly audits the security sector spending and evaluates the security sector performance	Security Sector Budgets	Practices	Accountability	Low
32	Findings of the SAACB audit reports on security agencies are published	Security Sector Budgets	Practices	Transparency	Low
33	SAACB recommendations are capitalized on	Security Sector Budgets	Practices	Accountability	Very Advanced
34	Legislation is in place, covering all procurements of the security sector without exception	Procurement and bidding	Regulations	Transparency	Low
35	Regulations on procurement bodies stipulate a full understanding of the cases of corruption	Procurement and bidding	Regulations	Integrity	Very Advanced
36	Regulations on security sector procurements are enforced effectively	Procurement and bidding	Practices	Accountability	Very Advanced
37	A procedure manual on public procurements and tenders is in place	Procurement and bidding	Practices	Accountability	Advanced
38	The oversight body for security sector procurements is independent	Procurement and bidding	Regulations	Accountability	Very Advanced
39	Oversight of security sector procurements is efficient	Procurement and bidding	Practices	Accountability	Very Advanced

40	Details of all procurements are available	Procurement and bidding	Practices	Transparency	Low
41	Data on procurements are published, usually in an accessible format	Procurement and bidding	Practices	Transparency	Low
42	The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases	Procurement and bidding	Practices	Integrity	Advanced
43	Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits	Procurement and bidding	Practices	Integrity	Advanced
44	Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest	Procurement and bidding	Regulations	Accountability	Very Advanced
45	A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications	Procurement and bidding	Practices	Accountability	Very Advanced
46	Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported	Procurement and bidding	Regulations	Accountability	Very Advanced
47	All contracts, including modifications after tenders are awarded, are publicly accessible	Procurement and bidding	Practices	Transparency	Low
48	Officials regularly produce audit compliance reports on contracts and achievements	Procurement and bidding	Practices	Transparency	Critical
49	Adequate actions are taken against all contract violations	Procurement and bidding	Practices	Accountability	Very Advanced
50	Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process	Procurement and bidding	Regulations	Accountability	Very Advanced
51	Mechanisms for filing challenges and complaints by companies are effective and systematically used	Procurement and bidding	Practices	Accountability	Very Advanced
52	Companies believe they will not face discrimination in future procurement operations if they file complaints	Procurement and bidding	Practices	Accountability	

53	Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption	Procurement and bidding	Regulations	Accountability	Very Advanced
54	Cases of corruption in procurements are investigated and offenders are put on trial without any undue political influence	Procurement and bidding	Practices	Accountability	Low
55	Promotions and privileges in security agencies are subject to laws and regulations	Recruitment and employee behavior	Practices	Transparency	Low
56	The security sector allows public access to information on the number of civil servants and security personnel	Recruitment and employee behavior	Practices	Transparency	Very Advanced
57	The security sector has faced the problem of ghost employees over the past five years	Recruitment and employee behavior	Practices	Integrity	Advanced
58	The size of the wage bill of civil servants and security personnel is made publicly available	Recruitment and employee behavior	Practices	Transparency	Very Advanced
59	Allowances paid to civil servants and security personnel are published and accessed by the public	Recruitment and employee behavior	Practices	Transparency	Low
60	Staff receive their salaries on time	Recruitment and employee behavior	Practices	Integrity	Very Advanced
61	The payment system is well-prepared, regular and public	Recruitment and employee behavior	Practices	Integrity	Very Advanced
62	Salaries and increments are publicly accessible	Recruitment and employee behavior	Practices	Transparency	Very Advanced
63	The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria	Recruitment and employee behavior	Regulations	Integrity	Advanced
64	In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures	Recruitment and employee behavior	Practices	Integrity	Very Advanced
65	The law prescribes specific penalties for corruption offences	Recruitment and employee behavior	Regulations	Accountability	Very Advanced

66	There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals	Recruitment and employee behavior	Regulations	Integrity	Very Advanced
67	Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers	Recruitment and employee behavior	Practices	Integrity	Very Advanced
68	A code of professional conduct is applicable	Recruitment and employee behavior	Practices	Integrity	Very Advanced
69	The code of professional conduct is disseminated to security personnel and is publicly available	Recruitment and employee behavior	Practices	Integrity	Very Advanced
70	Security personnel and civil servants receive anti-corruption training	Recruitment and employee behavior	Practices	Integrity	Very Advanced
71	Security personnel refrain from practices of nepotism and favoritism	Recruitment and employee behavior	Practices	Integrity	
72	A policy is in place to announce results of the trials of security personnel	Recruitment and employee behavior	Regulations	Transparency	Low
73	Results of trials are made publicly available	Recruitment and employee behavior	Practices	Transparency	Low
74	A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies	Intelligence services	Practices	Accountability	Critical
75	The oversight of Intelligence agencies' activities, management and budget allocations is effective	Intelligence services	Practices	Accountability	Advanced
76	Security agencies explain their decisions and the results of their actions to the public	Intelligence services	Practices	Integrity	
77	Recruitment in senior positions at the Intelligence service is affected by favoritism	Intelligence services	Practices	Integrity	Low
78	An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates	Intelligence services	Practices	Integrity	Critical

79	The proportion of discreet expenditures earmarked to Intelligence agencies (General Intelligence and Preventive Security services)	Intelligence services	Practices	Transparency	Critical
80	An information classification system is established in consistence with the law with a view to ensuring protection of information	Intelligence services	Regulations	Transparency	Low

● Index results by ratings

The report divides the Index into three categories: (1) aspects of integrity in the security sector; (2) regulations and practices; and (3) pillars of the integrity system.

● Index results of the aspects of integrity in the security sector

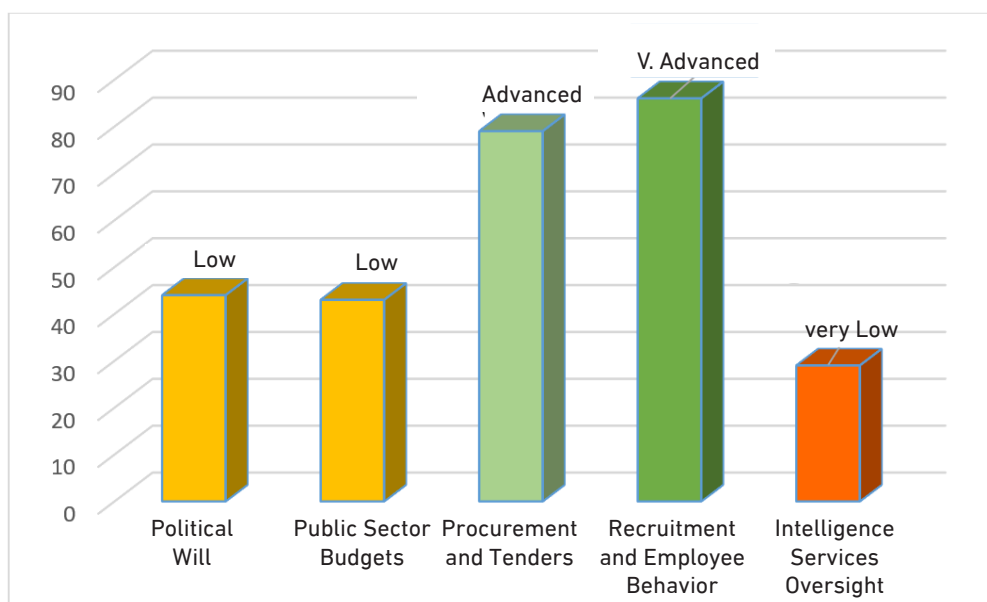
Results show varying ratings of the aspects of integrity in the security sector. Procurements and tenders, recruitment, and personnel conduct were rated as advanced. By contrast, the security sector budget had the rating of low. Political will and oversight of Intelligence agencies received the rating of very low. Table 6 below shows the numbers and average scores of indicators in each aspect.

Table 6: Average ratings of the aspects of integrity in the security sector

#	Sector	Number of Indicators	Indicators numbers	Relative weight of each aspect	Average score of each aspect
1	Political will	22	22-1	27.50%	44
2	Security sector Budget	11	33-23	13.75%	43
3	Procurement and bidding	21	54 -34	26.25%	79
4	Recruitment and employee behavior	19	73 -55	23.75%	86
5	Oversight of Intelligence agencies	7	68 -52	8.75%	29
Total		80	80-1	100%	62

Chart 4 below shows the rating of the aspects of integrity in the security sector as follows: (1) Procurements and tenders, (2) recruitment and personnel conduct, (3) security sector budget, (4) political will, and (5) over- sight of Intelligence agencies.

Chart (4): Integrity Ratings in the Security Sector



1. The rating of oversight of Intelligence agencies

Chart 4 above shows that oversight of Intelligence agencies had the rating of very low (21-35). For this aspect, three of seven indicators were rated as critical (0-20). These were:

- c. A specialized, independent (parliamentary or governmental) committee is in place to control policies, management and budget allocations to Intelligence agencies.
- d. An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates. for the posts of officers in the intelligence services.
- e. Share of undisclosed expenses from the total budget allocated to intelligence services (Public Intelligence Apparatus and Preventive Security Forces).

Two indicators received a Low rating (36-50); they are: (70) Recruitment in senior positions at the Intelligence service is affected by favoritism, and (80) An information classification system is established in consistence with the law with a view to ensuring protection of information; The indicator on Security agencies explain their decisions and the results of their actions to the public has been suspended.

2. The rating of political will

The low rating of the thematic area of political will is due to the fact that seven out of twenty-two indicators received a “critical” score. All the seven indicators fall under the sub indicator of “practice”, five of which are under the accountability pillar and the two others are under the transparency pillar. Six of the seven indicators on PLC, which is a key oversight body, received this rating since the PLC is dysfunctional. These indicators are:

- Effective PLC oversight of security agencies.
- The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector.
- Annual audit reports on security agencies are submitted to the PLC.
- The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB.
- The security policy or security strategy is deliberated by the PLC.
- PLC deliberations address security threats to the country.

Eight indicators received a Low rating (36-50): There is official oversight bodies diligently monitor the performance of security agencies in the West Bank civil society organizations and research centers discuss issues of integrity, transparency, and corruption in the security sector; anti-corruption policy is reflected in the security sector work plan and implementation is progressing according to schedule; compliance departments and units have the necessary financial and human resources; the state has an explicit anti-corruption policy that is effectively applied in the security sector; compliance departments and units enjoy independence; the challenging environment that enables corruption in the security sector is reviewed; corruption risk assessments are conducted periodically.

One indicator received an “Advanced” rating (18), which reflects the effectiveness of compliance units in the security sector. Four indicators in the “Political Will” area were rated “Very Advanced” (81-100), namely: Legislation exists that allows the Legislative Council to oversee the work of security institutions; there is a parliamentary committee competent to oversee security agencies in accordance with the legislation governing the work of the Legislative Council; civil society organizations and research centers discuss Integrity, Transparency and corruption issues in the security sector (these indicators come under the Regulations sector); Integrity assessment results are utilized in new policies and planning.

Two indicators have been suspended: The public trusts that security sector officials are serious about fighting corruption; Citizens have access to the security agencies' strategy or action plan.

3. The rating of security sector budget

The low rating of the security sector budget is attributed to four of 11 indicators, which had very low scores. All these indicators fall under practices. Two indicators were rated as critical: The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs; and The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures.

Another two indicators had the rating of very low: The security sector budget is publicly available, disaggregated and clearly defined before it is enacted; and Information requested by citizens, media outlets, and civil society on the security sector budget is provided in a timely fashion.

Four indicators were rated as low: The security sector budget includes comprehensive and detailed information on expenditures according to respective functions; The greatest portion of the enacted security sector budget is fully disclosed to the media and civil society actors; Findings of the SAACB audit reports on security agencies are published; and SAACB recommendations are capitalized on.

Two indicators obtained the rating of advanced: An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions; and The SAACB regularly audits the security sector spending and evaluates the security sector performance. One indicator was rated as very advanced: There is a clearly defined process of the budget planning cycle. Budget planning departments are established and independent. The latter falls under regulations.

4. The rating of recruitment and employee conduct

Chart 4 above shows that recruitment and employee conduct had the rating of very advanced. twelve of 19 indicators scored very advanced (eight indicators were related to integrity, three to transparency, and one to accountability) and they are:

- The security sector allows public access to information on the number of civil servants and security personnel.
- The size of the wage bill of civil servants and security personnel is made publicly available.
- Staff receive their salaries on time.
- The payment system is well-prepared, regular and public.
- Salaries and allowances are publicly accessible.
- In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures.
- The law prescribes specific penalties for corruption offences.
- There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals.
- Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers.
- A code of professional conduct is applicable.
- The code of professional conduct is disseminated to security personnel and is publicly available.
- Security personnel and civil servants receive anti-corruption training.

Two indicators received an “Advanced” rating: The security sector has been facing the issue of ghost employees for the past five years; the recruitment system for security personnel, at the middle and senior management levels, includes objective criteria for the position, as well as standardized evaluation processes.

Four indicators received a “Low” rating, and they are:

- Promotions and privileges in agencies are subject to laws and regulations.
- Allowances paid to civil servants and security personnel are published and accessed by the public.
- A policy is in place to announce results of the trials of security personnel.
- Results of trials are made publicly available

One indicator (71) has been suspended: Workers in the security services refrain from practicing wasta and favoritism.

5. Procurement and bidding thematic area

Table 4 shows that the area of procurement and bidding in the security sector received an Advanced rating; eleven indicators (52% of all indicators in this area) received a Very Advanced rating (81-100) out of a total of twenty-one indicators (ten of the eleven indicators that received a Very Advanced rating are from the Accountability pillar, while the eleventh indicator is from the Integrity pillar), including six indicators classified in the Regulations sector, namely:

- Regulations on procurement bodies stipulate a full understanding of the cases of corruption.
- The oversight body for security sector procurements is independent.
- Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest.
- Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed, and reported.

- Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process.
- Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption.

Within the Practices sector, there are five indicators:

- Regulations on security sector procurements are enforced effectively.
- Oversight of security sector procurements is efficient.
- A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications.
- Adequate actions are taken against all contract violations.

On the other hand, Indicator 48 (officials regularly issue contract compliance and completion monitoring reports) received a Critical rating, while three indicators received an Advanced rating:

- The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases.
- Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits.
- A procedure manual on public procurements and tenders is in place.

Five indicators (24% of the total indicators in the Procurement and bidding domain) received a “Low rating”; all from the Transparency pillar:

- Legislation is in place, covering all procurements of the security sector without exception,
- Details of all procurements are available.
- Data on procurements are published, usually in an accessible format.
- All contracts, including modifications after tenders are awarded, are publicly accessible.
- All contracts, including modifications after tenders are awarded, are publicly accessible.
- Cases of corruption in procurements are investigated, and offenders are put on trial without any undue political influence.

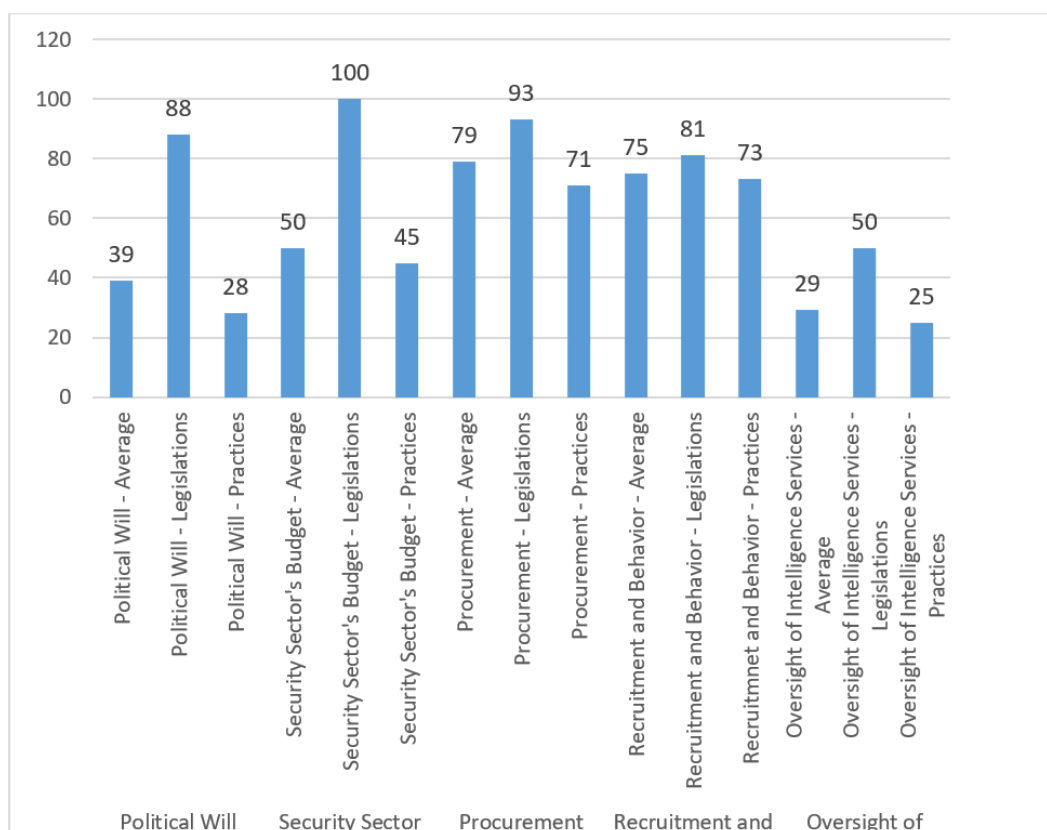
Indicator 52 (complaints are filed with the security forces in the West Bank fearlessly) has been suspended.

Impact of the Regulations indicators score on the security sector’s ratings

The rating of the security sector’s areas differs significantly between legislation and practice indicators, as shown in Figure (5) below. The political will rating score is 67 points higher than the practice rating score (88 vs. 21); the security budget rating score is 62 points higher than the practices rating score (100 vs. 38); the procurement rating score is 22 points above the practice rating score (93 vs. 71); and the intelligence oversight rating score is 25 points higher than the practice rating (50 vs. 25).

In contrast, the scores for indicators related to recruitment practices and employee conduct are seven points higher than those for legislation (88 vs. 81). As the chart below shows, when the political will indicators are stripped of those related to legislation and limited to practices, they received a “very low” rating. This indicates significant weaknesses in practice in the security sector, compared to the existence of legal norms that guarantee integrity in the governance in these areas.

Chart (5): Average score in the security sector areas for the indicators on regulations and practices



● Scores for Regulations and Practices rating:

The results for the Regulations and Practices sub-indicator show that the Regulations sub-indicator has a "Very Advanced" rating, while the Practices sub-indicator has a "Medium" rating. Table 7 shows the number of indicators in each sector and their average score

Table (7): Average Scale Scores by Regulations Practices Sectors

#	Sectors	Number of Indicators	Indicators Numbers	Relative weight of sector	Average score of each sector after weighting
1	Regulations Indicators	17	38 ,35 ,34 ,23 ,14 ,13 ,4 ,1 ,66 ,65 ,63 ,53 ,50 ,46 ,44 ,80 ,72	21%	87
2	Practices Indicators	63	-36 ,33-24 ,22-15 ,12-5 ,3 -2 ,52-51 ,49-47 ,45 ,43-39 ,37 ,75 -73 ,71-67 ,64 ,62-54 ,79-76	79%	55

The Regulations sector received a “very advanced” rating. Twelve indicators, being 70.50% of the total indicators of the regulations sector, received a “very advanced ” rating.

- Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment.
- A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders.
- Civil society organizations and research centers discuss the issues of integrity, transparency and corruption within the security sector.
- A clearly defined process of the budget planning cycle is in place.
- Regulations on procurement bodies stipulate a full understanding of the cases of corruption.
- The oversight body for security sector procurements is independent.
- Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest.
- Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported.
- Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process.
- Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption.
- The law prescribes specific penalties for corruption offences.
- There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals.

One indicator received an “Advanced” rating (the recruitment system for security personnel at the middle and senior management levels includes objective criteria for the position, as well as standardized evaluation processes).

In contrast, four indicators received low ratings: The state has an explicit anti-corruption policy that is effectively enforced in the security sector; legislation that covers all procurement related to the security sector without exception; a policy to publicize the results of trials of security sector personnel; and an information classification system in line with the law to ensure the protection of information.

Nine of the twelve indicators in the Regulations sector that received a “Very Advanced” rating fall under Accountability, one under Transparency, and two under Integrity. Three of the four indicators with Low ratings are located in Transparency and one in Integrity. The indicator with an Advanced rating is in Integrity pillar.

Chart (6): Ratings of the Regulations and Practices Sectors

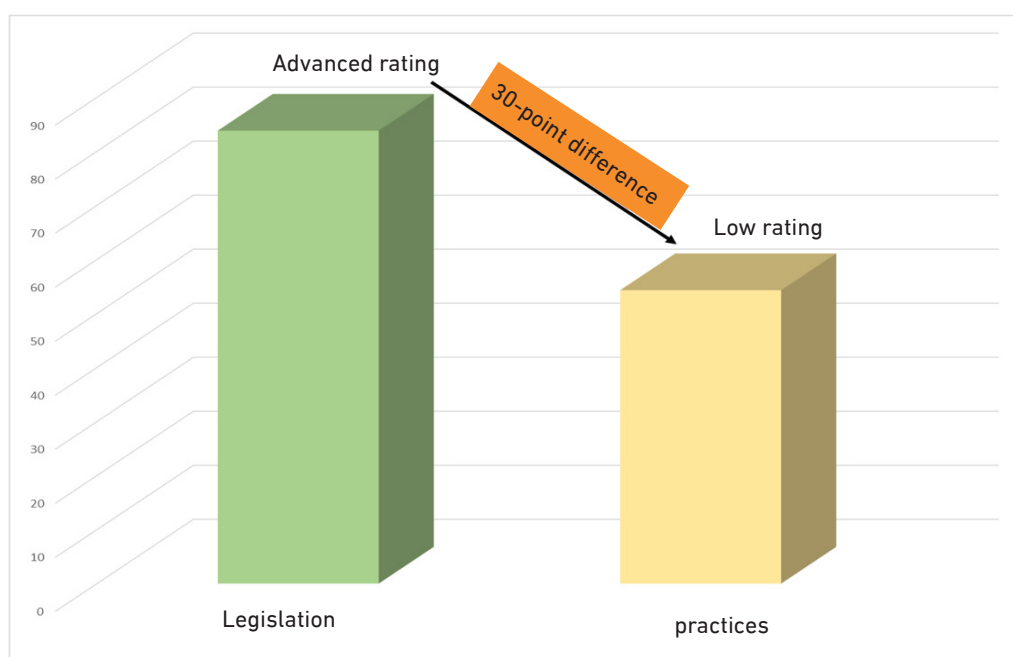


Figure 6 shows that the average score for Regulations is about 32 points higher than for Practices. The Practices sector, which consists of 58 indicators, with all five indicators from the Practices sector suspended for this reading, received a score that places it in the "Intermediate" category. Seventeen indicators received a "Very Advanced" rating, fifteen indicators received a "Critical" rating, nineteen indicators received a "Low" rating, and seven indicators received an "Advanced" rating.

Seventeen indicators were rated Very Advanced (29% of all Practices sector indicators):

- New policies and plans are informed by findings of the integrity assessment.
- The recommendations issued by SAACB are utilized.
- Regulations on security sector procurements are enforced effectively.
- Oversight of security sector procurements is efficient.
- A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications.
- Adequate actions are taken against all contract violations.
- Mechanisms for filing challenges and complaints by companies are effective and systematically used.
- The security sector allows public access to information on the number of civil servants and security personnel.
- The size of the wage bill of civil servants and security personnel is made publicly available.
- In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures.
- Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers.
- Staff receive their salaries on time.
- The payment system is well-prepared, regular and public.
- Salaries and increments are publicly accessible.
- A code of professional conduct is applicable.
- The code of professional conduct is disseminated to security personnel and is publicly available.
- Security personnel and civil servants receive anti-corruption training.

In contrast, fifty indicators (26% of the Practices sector indicators) were rated “critical “; they are:

- Effective PLC oversight of security agencies.
- The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector.
- Annual audit reports on security agencies are submitted to the PLC.
- The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB.
- The security policy or security strategy is deliberated by the PLC.
- PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector.
- Right of access to updated documents and information on the security sector policy or security strategy is safeguarded.
- The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs.
- The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures.
- The security sector budget is publicly available, disaggregated and clearly defined before it is enacted.
- The greatest portion of the enacted security sector budget is fully disclosed to the media and civil society actors.
- Officials regularly produce audit compliance reports on contracts and achievements.
- A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies.
- An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates.
- The proportion of discreet expenditures earmarked to Intelligence agencies (General Intelligence and Preventive Security services).

● Ratings by pillars:

Figure 7 below indicates that the results of the Integrity sub-indicators show that Transparency received a “Low” rating compared to Integrity, which received an “Advanced” rating, and Accountability, which received a “Medium” rating with a difference of ten points between them. Table (8) shows the number of indicators and their numbers that go into each pillar and their average score.

Table (8): Average indicators scores per integrity pillar

#	Pillars of the integrity system	Total indicators	Numbers of indicators	Relative weight of each pillar	Average score of each pillar
1.	Transparency	24	-47 ,41-40 ,34 ,32 ,29-27 ,24-23 ,12-9 80-79 ,73-72 ,62 ,59-58 ,56-55 ,48	30%	46
2.	Accountability	36	-36 ,33 ,31-30 ,26-25 ,22-18 ,13 ,8-1 75-74 ,65 ,54-49 ,46-44 ,39	45%	65
3.	Integrity	20	,64- 63 ,61-60 ,57 ,43-42 ,35 ,17-14 78-76 ,71-66	25%	72
Total		80	80-1	100%	62

1. Transparency Pillar

The 24-indicator Transparency pillar received a "Low" rating. Four indicators received a "Very Advanced" rating, three of which are in the Practices sector: Salaries and allowances are made public; the security sector makes information on the number of civilian and security personnel available to the public; the size of salaries for civilian and security personnel is made public; and one in the Regulations sector: There is a clear process for a budget planning cycle and independent budget planning departments. Thirteen indicators received a Low rating.

In contrast, six indicators received a Critical rating, namely: (1) Issues under discussion in the Legislative Council include: Security threats facing the country, procurement decisions and the level of spending on the security sector, personnel and budget, and the use of the security sector's operational capacity. (2) The vast majority of the fully authorized security sector budget is disclosed to the media and civil society actors. (3) Officials regularly release contract compliance and fulfillment monitoring reports. (4) Ensure access to documents and updated information on security sector policy or strategy. (5) The security sector budget is publicly available, detailed, and clear before it is approved. (6) The percentage of the budget allocated to intelligence agencies (General Intelligence Service and Preventive Security Service).

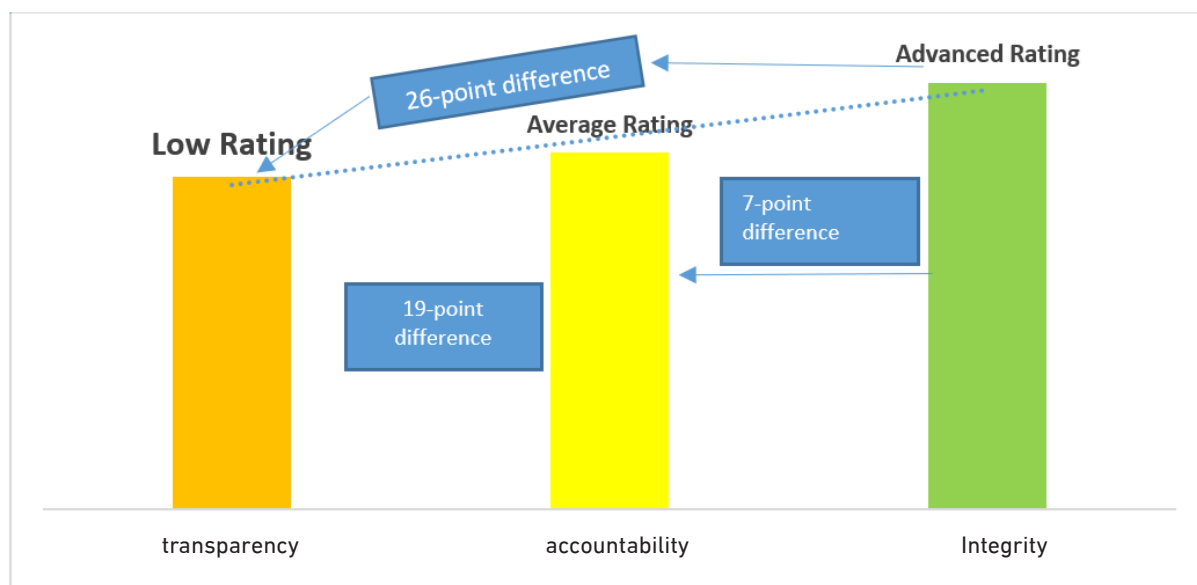
2. Accountability Pillar

Accountability, which contains 36 indicators representing 44% of the scale's weight¹¹, is rated Medium. Sixteen indicators received a "Very Advanced" rating, nine of which are related to Regulations, namely:

- Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment.
- A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders.
- Civil society organizations and research centers discuss the issues of integrity, transparency and corruption within the security sector.
- New policies and plans are informed by findings of the integrity assessment.
- SAACB recommendations are capitalized on.
- Regulations on security sector procurements are enforced effectively.
- The oversight body for security sector procurements is independent.
- Oversight of security sector procurements is efficient.
- Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest.
- A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications.
- Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported.
- Adequate actions are taken against all contract violations.
- Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process.
- Mechanisms for filing challenges and complaints by companies are effective and systematically used.
- Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption.
- The law prescribes specific penalties for corruption offences.

¹¹ Indicators 19 and 52, which are among the Accountability Pillar indicators, have been suspended.

Chart (7): Integrity pillar ratings



In contrast, eight indicators received a “Critical” rating; they all relate to practices, namely:

- Effective PLC oversight of security agencies.
- The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector.
- Annual audit reports on security agencies are submitted to the PLC.
- The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB.
- The security policy or security strategy is deliberated by the PLC.
- The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs.
- The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures.
- A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies.

Five indicators were rated low (36-50); they are:

- Official oversight bodies in Palestine diligently monitor security agencies in the West Bank.
- Challenges that furnish an opportunity for corruption in the security sector are reviewed.
- Assessments of risks of corruption are provided on a regular basis.
- The SAACB regularly audits the security sector spending and evaluates the security sector performance.
- Cases of corruption in procurements are investigated, and offenders are put on trial without any undue political influence.

Four indicators were rated “Advanced”, namely: (1) effectiveness of oversight of intelligence services’ activities, administrations and budgets. (2) Effectiveness of Compliance Unites in the security sector. (3) The Internal Control Unit “Internal Finance” is in place and effective and enjoys experience and independence in its functions. (4) A public procurement and bids manual is in place.

3. Integrity Pillar

The Integrity pillar, which is rated by 20 indicators that represent 25% of the Index weight¹², was rated “Advanced”. Nine indicators (50% of the integrity pillar’s indicators) received a “very advanced” rating. They are:

- Regulations on procurement bodies stipulate a full understanding of the cases of corruption.
- Staff receive their salaries on time.
- In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures.
- The payment system is well-prepared, regular and public.
- There are regulations on whistleblowing and adequate protection is provided to whistleblowers from the security sector against any reprisals.
- Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers.
- A code of professional conduct is applicable.
- The code of professional conduct is disseminated to security personnel and is publicly available.
- Security personnel and civil servants receive anti-corruption training

In contrast, one indicator received a “Critical” rating: Candidates’ fitness for a position is scrutinized by an external committee (e.g., the Governance Integrity Commission).

Five indicators (28% of all Integrity pillar indicators) received a Low rating

- The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector.
- The anti-corruption policy is reflected in the security sector’s plan of action. Implementation makes progress in line with the set timeframe.
- Needed financial and human resources are made available at compliance departments and units.
- Compliance departments and units are independent.
- Recruitment in senior positions at the Intelligence service is affected by favoritism

Four indicators were rated “Advanced”. They are:

- The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases.
- Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits.
- The security sector has faced the problem of ghost employees over the past five years.
- The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria.

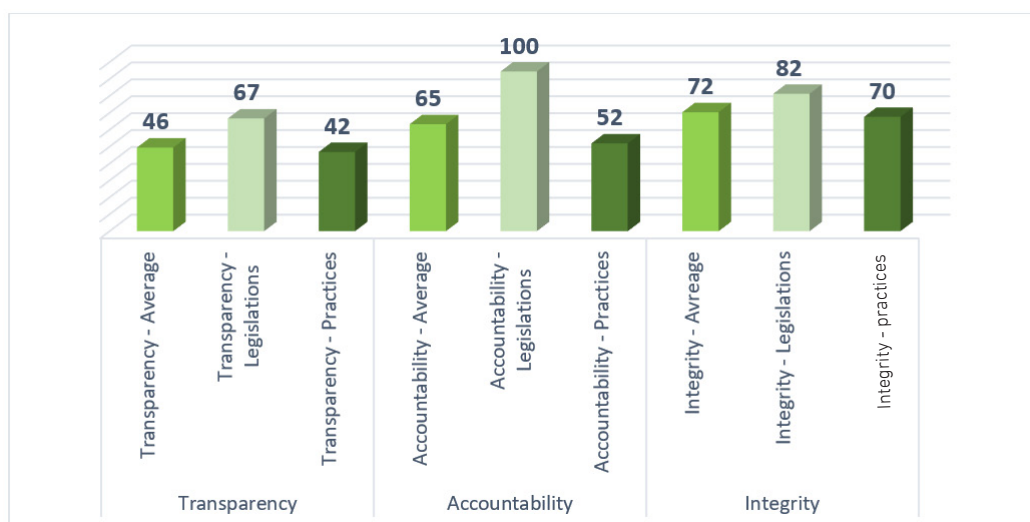
Impact of the Regulations Indicators’ scores on the ratings of the Integrity sub-indicators:

The sub-indicators’ scores for the Integrity pillars in the security sector, as shown in Figure 8 below, differ markedly between Regulations and Practices indicators. When the Accountability pillar’s indicators are stripped of Regulations and limited to Practices, the score for this pillar drops from “65” to “52”. The Regulations score for Accountability is 48 points higher than the Practices score (100 vs. 52), and the Regulations score for Transparency is 25 points higher than the Practices score (67 vs. 42). The Practices score in Integrity is 7 points lower than the Regulations score (82 vs. 75).

As the table below indicates, the scores for the Regulations indicators in the Transparency pillar are still low and need further attention and development.

12 Indicators 71 and 76, which are part of the Integrity Pillar indicators, have been suspended

Chart (8): Average Security Sector's Areas' Scores
with Comparison of the Regulations and Practices Indicators



● Scale scores and domains without external environment indicators

The overall score of the Security Sector Integrity Scale, when not including the results of indicators related to the external environment (indicators related to the Legislative Council's oversight of the security sector and the approval of the general budget and its information), which is not the work of the security agencies but rather a guarantor of the integrity of the security sector's integrity system, shows an increase of 7 points. While the Security Sector Integrity measure scored 62 out of 100 when the 75 indicators are included, the same measure, without the results of the indicators related to the absence of the role of the Legislative Council and the lack of transparency of the public budget, scored 69 out of 100, a difference of seven points (Advanced rating).

It is clear that the absence of the Legislative Council due to the lack of general elections, and the weakness of the public budget database and detailed data on security institutions, agencies, and procurement on the Ministry of Finance's website, which is related to the overall transparency of the government's work, affected the security sector's Integrity Scale score (see the following table).

Table (9): Comparison of the scale score and rankings with all 80 indicators
The scale score and rankings without calculating the indicators related to
the Legislative Council and the public budget

	Index Score	Index score without Legislative Council Indicators	Difference
Total mark	62	69	7
Areas			
Political Will	44	57	13
Security Sector Budget	43	53	10
Procurement and bidding	79	79	--
Recruitment and employee behavior	86	86	3
Intelligence monitoring services	29	29	--
Sectors			
Regulations	87	84	-3
Practices	55	64	9
Pillars			
Transparency	46	52	6
Accountability	65	79	14
Integrity	76	76	--

The table above indicates that the Political Will thematic area score rises by thirteen points when the external environment indicators are not included (57 compared to 44), and the Security Sector Budget area score rises by 10 points when the eleven external environment indicators are not included (53 compared to 43), moving this domain from a Low to a Medium rating.

As for the sector ratings, the Practices sector score increases by 9 points when the external environment indicators are not included (55 to 64), while the Regulations sector score decreases by 2 points (87 vs. 85).

Transparency increases by six points (52 vs. 46), moving from Low to Medium, Accountability increases by 14 points (79 vs. 65), moving from Medium to Advanced, and Integrity remains at the same score (76) and remains in the same Advanced category. The results of the previous comparison indicate that there will be a significant improvement in the overall score of the index and its ratings, especially in the Practices and Security Budget areas, and the improvement of the political will represented by the presence of the Legislative Council and the realization of its functions in overseeing the security sector, which will help improve the results of the Transparency and Accountability pillars in the security sector.

Results of the four readings of the integrity index in the Palestinian security sector

This part compares the fourth index reading with previous readings. It starts by comparing the results of the four readings then proceeds to a presentation of the different ratings to compare results in all readings.

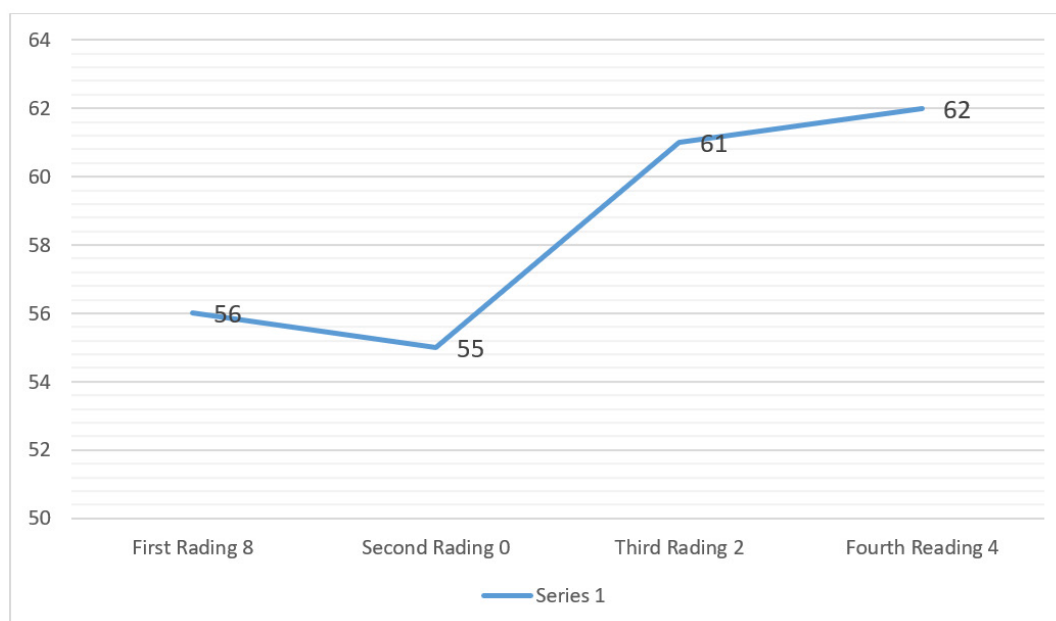
● Index scores in the four readings

The first reading showed a score of (56). The index then regressed by one point recording (55) in the second reading, remaining in an average rating. The third reading (61) showed an increase by six points from the previous reading and increased by an additional point in the fourth reading. However, the rating remained average.

Table (10): Index scores in the four readings

Score	Year	Reading
56	2018	First reading overall index score
55	2020	Second reading overall index score
61	2022	Third reading overall index score
62	2024	Fourth reading overall index score

Chart (9): Index scores in the four readings



Key observations regarding the indicators in the four readings

1. Forty-four indicators maintained in the fourth reading the same score as the third, second and first ones. These include nineteen indicators that has a score of (100) in the four readings, another four indicators that scored (75), eleven indicators with a score of (50), and eleven indicators with the score (0). The indicators that maintain score (100) in the fourth reading are (1,4,23,35,36,38,39,44,46,49,50,53,60,62,65,68,69):

- Some laws provide for PLC oversight of the security sector.
- There is a parliamentary committee specializing in oversight of the security establishment according to the PLC standing order.
- The budget planning follows a standard cycle and independent departments are in charge of budget planning.
- Procurement authorities are subject to regulations that ensure awareness of corruption related issues.
- Procurement regulations are applied effectively in the security sector.
- Procurement oversight body in the security sector is independent.
- Procurement oversight in the security sector is effective.
- Officials involved in the design of tender specifications, or involved in tender board decisions, are subject to regulations or codes of conduct designed to avoid conflicts of interest.
- There is a comprehensive vetting process in which officials are involved in the vetting of suppliers and the design of bid specifications.
- Formal policies and procedures exist that specify how supplier service and/or delivery commitments are monitored, evaluated and reported.
- All contract violations are adequately addressed.
- There are formal mechanisms that allow companies to file complaints about procurement malpractice.
- Penalties in the law are clear to penalize a supplier for corruption.
- Employees receive their salaries on time.
- The payment system is well established, regular and publicized.
- The system of salaries and allowances is made public.
- There are specific penalties in the law for corruption offenses.
- A code of conduct exists.
- The code of conduct is circulated to security personnel and is publicly available.

The four indicators that maintained a score of (75) are (18, 30, 42, and 43) :

- Compliance units within the security sector are effective
- An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions
- The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases
- Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits

Eleven indicators maintained a score of (50). These are (16, 17, 32, 34, 40, 41, 47, 59, 72, 73, and 77)

- Needed financial and human resources are made available at compliance departments and units
- Compliance departments and units are independent
- Findings of the SAACB audit reports on security agencies are published
- Legislation is in place, covering all procurements of the security sector without exception
- Details of all procurements are available
- Data on procurements are published, usually in an accessible format

- All contracts, including modifications after tenders are awarded, are publicly accessible
- Allowances paid to civil servants and security personnel are published and accessed by the public
- A policy is in place to announce results of the trials of security personnel
- Results of trials are made publicly available
- Recruitment in senior positions at the Intelligence service is affected by favoritism

The fourth reading showed that eleven indicators (2, 3, 6, 9, 25, 26, 48, 74, and 78) stayed in a critical rating, similar to the previous three readings. These indicators scored the lowest score (0). These are:

- Effective PLC oversight of security agencies
- The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector
- Annual audit reports on security agencies are submitted to the PLC
- The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB
- The security policy or security strategy is deliberated by the PLC
- PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector
- The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs
- The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures
- Officials regularly produce audit compliance reports on contracts and achievements
- A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies.
- An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates.

Table (11): scores per indicator in the four readings

#	Indicator	First Reading Score 2018	Second Reading Score 2020	Third Reading Score 2022	Fourth Reading Score 2024
1	Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment	100	100	100	100
2	Effective PLC oversight of security agencies	0	0	0	0
3	The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector	0	0	0	0
4	A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders	100	100	100	100
5	Official oversight bodies diligently monitor the performance of security agencies in the West Bank.	58	65	48	50
6	Annual audit reports on security agencies are submitted to the PLC	0	0	0	0

#	Indicator	First Reading Score 2018	Second Reading Score 2020	Third Reading Score 2022	Fourth Reading Score 2024
7	The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB	0	0	0	0
8	The security policy or security strategy is deliberated by the PLC	0	0	0	0
9	PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector	0	0	0	0
10	Regular consultations on the security sector policy and security strategy take place with the public	21	21	23	Suspended
11	Right of access to updated documents and information on the security sector policy or security strategy is safeguarded	75	75	75	0
12	There are indications that security institutions are open to civil society organizations	50	50	75	50
13	Civil society organizations and research centers discuss the issues of integrity, transparency and corruption within the security sector	75	50	50	100
14	The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector	75	75	50	50
15	The anti-corruption policy is reflected in the security sector's plan of action. Implementation makes progress in line with the set timeframe	25	25	50	50
16	Needed financial and human resources are made available at compliance departments and units	50	50	50	50
17	Compliance departments and units are independent	50	50	50	50
18	Compliance units within the security sector are effective	75	75	75	75
19	The public are confident that security officials are seriously willing to combat corruption	55	75	56	suspended
20	Challenges that furnish an opportunity for corruption in the security sector are reviewed	0	0	50	50
21	Assessments of risks of corruption are provided on a regular basis	0	0	50	50
22	New policies and plans are informed by findings of the integrity assessment	0	50	100	100
23	A clearly defined process of the budget planning cycle is in place. Budget planning departments are established and independent	100	100	100	100
24	The security sector budget includes comprehensive and detailed information on expenditures according to respective functions	50	0	75	50

#	Indicator	First Reading Score 2018	Second Reading Score 2020	Third Reading Score 2022	Fourth Reading Score 2024
25	The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs	0	0	0	0
26	The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures	0	0	0	0
27	The security sector budget is publicly available, disaggregated and clearly defined before it is enacted	25	0	50	0
28	The greatest portion of the enacted security sector budget is fully disclosed to the media and civil society actors	50	0	0	0
29	Information requested by citizens, media outlets, and civil society on the security sector budget is provided in a timely fashion	25	25	50	50
30	An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions	75	75	75	75
31	The SAACB regularly audits the security sector spending and evaluates the security sector performance	75	75	50	50
32	Findings of the SAACB audit reports on security agencies are published	50	50	50	50
33	SAACB recommendations are capitalized on	50	50	100	100
34	Legislation is in place, covering all procurements of the security sector without exception	50	50	50	50
35	Regulations on procurement bodies stipulate a full understanding of the cases of corruption	100	100	100	100
36	Regulations on security sector procurements are enforced effectively	100	100	100	100
37	A procedure manual on public procurements and tenders is in place	50	75	75	75
38	The oversight body for security sector procurements is independent	100	100	100	100
39	Oversight of security sector procurements is efficient	100	100	100	100
40	Details of all procurements are available	50	50	50	50
41	Data on procurements are published, usually in an accessible format	50	50	50	50
42	The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases	75	75	75	75

#	Indicator	First Reading Score 2018	Second Reading Score 2020	Third Reading Score 2022	Fourth Reading Score 2024
43	Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits	75	75	75	75
44	Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest	100	100	100	100
45	A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications	100	100	100	100
46	Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported	100	100	100	100
47	All contracts, including modifications after tenders are awarded, are publicly accessible	50	50	50	50
48	Officials regularly produce audit compliance reports on contracts and achievements	0	0	0	0
49	Adequate actions are taken against all contract violations	100	100	100	100
50	Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process	100	100	100	100
51	Mechanisms for filing challenges and complaints by companies are effective and systematically used	50	100	100	100
52	Companies believe they will not face discrimination in future procurement operations if they file complaints	51	70	60	Suspended
53	Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption	100	100	100	100
54	Cases of corruption in procurements are investigated and offenders are put on trial without any undue political influence	75	75	50	50
55	Promotions and privileges in security agencies are subject to laws and regulations	41	41	39	50
56	The security sector allows public access to information on the number of civil servants and security personnel	50	0	50	100
57	The security sector has faced the problem of ghost employees over the past five years	100	100	75	75
58	The size of the wage bill of civil servants and security personnel is made publicly available	100	0	50	100

#	Indicator	First Reading Score 2018	Second Reading Score 2020	Third Reading Score 2022	Fourth Reading Score 2024
59	Allowances paid to civil servants and security personnel are published and accessed by the public	50	50	50	50
60	Staff receive their salaries on time	100	100	100	100
61	The payment system is well-prepared, regular and public	100	100	100	100
62	Salaries and increments are publicly accessible	100	100	100	100
63	The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria	50	50	75	75
64	In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures	50	75	75	100
65	The law prescribes specific penalties for corruption offences	100	100	100	100
66	There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals	75	100	100	100
67	Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers	75	75	75	100
68	A code of professional conduct is applicable	100	100	100	100
69	The code of professional conduct is disseminated to security personnel and is publicly available	100	100	100	100
70	Security personnel and civil servants receive anti-corruption training	50	50	75	100
71	Security personnel refrain from practices of nepotism and favoritism	25	33	32	Suspended
72	A policy is in place to announce results of the trials of security personnel	50	50	50	50
73	Results of trials are made publicly available	50	50	50	50
74	A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies	0	0	0	0
75	The oversight of Intelligence agencies' activities, management and budget allocations is effective	50	50	75	75
76	Security agencies explain their decisions and the results of their actions to the public	56	48	38	suspended
77	Recruitment in senior positions at the Intelligence service is affected by favoritism	50	50	50	50
78	An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates	0	0	0	0

#	Indicator	First Reading Score 2018	Second Reading Score 2020	Third Reading Score 2022	Fourth Reading Score 2024
79	The proportion of discreet expenditures earmarked to Intelligence agencies (General Intelligence and Preventive Security services)	75	50	50	0
80	An information classification system is established in consistence with the law with a view to ensuring protection of information	25	50	50	50

Sixty-two indicators sustained in the fourth reading the same score as the third one. The score of five other indicators dropped while eight other indicators marked a rise. Five indicators have been suspended, as explained in the methodology.

The fourth reading scored a decrease in five indicators including one indicator that fell from (75) to (0). This is indicator 11 that relates to the right to access updated documents and information on security sector policy or security strategy. In the fourth reading, the score for two indicators (12 and 24) decreased from 75 to 50; the first relates to evidence that security sector institutions practice openness towards civil society organizations, and the second relates to the inclusion in the security sector budget of comprehensive and detailed information on expenditures by function. The score for two indicators decreased in the fourth reading from (50) to (0), namely: Indicator No. 27 related to the security sector budget being publicly available, detailed and clear before its approval, and Indicator No. 79 related to the percentage of the budget allocated to the intelligence services (the General Intelligence Service and the Preventive Security Service) that is concealed.

On the other hand, the scores of eight indicators increased in the fourth reading compared to the third reading:

- Indicator No. (5) related to the existence of serious oversight of the performance of the security services in the West Bank by official oversight institutions in Palestine, from (48) to (50).
- Indicator No. (13) related to civil society organizations and research centers discussing the issues of integrity, transparency and corruption in the security sector, from (50) to (100).
- Indicator No. (55) related to the subjection of promotions and privileges in agencies to laws and regulations, from (41) to (50).
- Indicator 56: The security sector makes information on the number of civilian and security personnel available to the public, from a score of 50 to a score of 100.
- Indicator 58 on publicizing the size of the salaries of civilian and security personnel, from 50 to 100.
- Indicator 64: Security sector organizations publicly commit, through speeches or media interviews, to anti-corruption and integrity measures, from a score of 75 to a score of 100.
- Indicator 67 on encouraging whistleblowing through training, information and guidance on whistleblowing processes and whistleblower protection procedures, from 75 to 100.
- Indicator 70 on conducting anti-corruption training for security and civil servants, from 75 to 100.

● Comparing results per ratings in the four readings

Comparison is made per area of integrity in the security sector and according to the regulations and practices sectors. The third rating applies to the pillars of the integrity system.

● Results of ratings of integrity areas in the security sector in the four readings

The fourth reading showed an increase in the average score of the two areas (procurement and bidding AND recruitment and employees' behavior) but the average score decreased in the three areas (political will, security sector budget, and oversight of intelligence services).

Table (12): comparing average ratings scores in the areas of integrity in the security sector

No	Ratings	Average score per rating in the first reading	Average score per rating in the second reading	Average score per rating in the third reading	Average score per rating in the fourth reading
1.	Political will	37	39	46	44
2.	Security sector budget	45	34	50	43
3.	Procurement and bidding	75	80	78	79
4.	Recruitment and employee behavior	72	67	73	86
5.	Oversight of intelligence services	37	35	38	29
Total		56	55	61	62

Rating for oversight of intelligence services

The results of the fourth reading of the domains showed that three out of the seven indicators of the intelligence services oversight subscale maintained their score in the four readings, namely: (1) There is a specialized independent committee (parliamentary or governmental) to oversee intelligence services' policies, management, and budgets. (2) There is favoritism in appointments to senior positions in the intelligence service. (3) The suitability of candidates is scrutinized by an external committee (e.g., the Governance Integrity Commission). One indicator maintained the same score in the last three readings, namely indicator 80 on the existence of an information classification system in line with the law to ensure the protection of information. The indicator on the effectiveness of oversight of the activities, management, and budgets of intelligence services maintained the same score as in the previous reading.

In the fourth reading, the score for one indicator decreased: the percentage of the budget allocated to the intelligence services (the General Intelligence Service and the Preventive Security Service). The indicator related to the ability of security agencies to explain their decisions and the results of their actions to the public was suspended.

Political will rating

The results of the fourth reading of the ratings showed that sixteen out of twenty-two indicators of the political will rating maintained their score in the second reading, namely:

- Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment.
- The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector.
- A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders.
- Annual audit reports on security agencies are submitted to the PLC.
- The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB.
- The security policy or security strategy is deliberated by the PLC.
- PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector.
- The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector.
- The anti-corruption policy is reflected in the security sector's plan of action. Implementation makes progress in line with the set timeframe.
- Needed financial and human resources are made available at compliance departments and units.
- Compliance departments and units are independent.
- Compliance units within the security sector are effective.
- Challenges that furnish an opportunity for corruption in the security sector are reviewed.
- Assessments of risks of corruption are provided on a regular basis.
- New policies and plans are informed by findings of the integrity assessment.

On the other hand, the score of two indicators increased in the fourth reading compared to the third reading: (1) There is serious oversight of the performance of the security services in the West Bank from the official oversight institutions in Palestine (2) Civil society organizations and research centers discuss issues of integrity, transparency, and corruption in the security sector. (2) Civil society organizations and research centers discuss issues of integrity, transparency, and corruption in the security sector. Two indicators scored lower: (1) access to documents and up-to-date information about security sector policy or strategy is guaranteed; (2) there is evidence that security sector institutions practice openness towards civil society organizations.

Security sector budget rating

Five indicators preserved their score in the four readings. These are:

- A clearly defined process of the budget planning cycle is in place. Budget planning departments are established and independent.
- The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs.
- The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures.
- An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions.
- Findings of the SAACB audit reports on security agencies are published.

Four indicators maintained their scores in the third and fourth readings: 1) Information requested by citizens, media outlets, and civil society on the security sector budget is provided in a timely fashion. 2) The SAACB regularly audits the security sector spending and evaluates the security sector performance. 3) The SAACB regularly audits the security sector spending and evaluates the security sector performance. 4) SAACB recommendations are capitalized on.

In contrast, two indicators in the fourth reading of the Security Sector Budget sub-scale out of eleven decreased in score compared to the third reading, namely: 1) The security sector budget includes comprehensive and detailed information on expenditures according to respective functions. 2) The security sector budget is publicly available, disaggregated and clearly defined before it is enacted.

Recruitment and employee behavior rating

The results of the fourth reading of the domains showed that nine out of nineteen indicators of the Recruitment and employee behavior subscale maintained their score as in the first reading, namely:

- Allowances paid to civil servants and security personnel are published and accessed by the public.
- Staff receive their salaries on time.
- The payment system is well-prepared, regular and public.
- Salaries and increments are publicly accessible.
- The law prescribes specific penalties for corruption offences.
- A code of professional conduct is applicable.
- The code of professional conduct is disseminated to security personnel and is publicly available.
- A policy is in place to announce results of the trials of security personnel.
- Results of trials are made publicly available

Three indicators maintained the same score as in the previous reading: 1) The security sector has faced the problem of ghost employees over the past five years. 2) The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria. 3) There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals.

On the other hand, six indices rose: 1) Promotions and privileges in security agencies are subject to laws and regulations. 2) The security sector allows public access to information on the number of civil servants and security personnel. 3) The size of the wage bill of civil servants and security personnel is made publicly available. 4) In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures. 5) Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers. 6) Security personnel and civil servants receive anti-corruption training. As for the 19th indicator, it was suspended due to unavailability of survey-based data.

Procurement and bidding rating

Eighteen of the twenty-one indicators of the Recruitment and employee behavior subscale maintained the same score across the four readings:

- Legislation is in place, covering all procurements of the security sector without exception.
- Regulations on procurement bodies stipulate a full understanding of the cases of corruption.
- Regulations on security sector procurements are enforced effectively.
- The oversight body for security sector procurements is independent.
- Oversight of security sector procurements is efficient.

- Details of all procurements are available.
- Data on procurements are published, usually in an accessible format.
- Data on procurements are published, usually in an accessible format.
- The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases.
- Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits.
- Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest.
- A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications.
- Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported.
- All contracts, including modifications after tenders are awarded, are publicly accessible.
- Officials regularly produce audit compliance reports on contracts and achievements.
- Adequate actions are taken against all contract violations.
- Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process.
- Mechanisms for filing challenges and complaints by companies are effective and systematically used.
- Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption.

Two indicators maintained the mark they received in the previous reading: 1) A procedure manual on public procurements and tenders is in place. 2) Cases of corruption in procurements are investigated and offenders are put on trial without any undue political influence. An indicator in the Procurement and bidding domain was suspended in this reading.

● Results for the Regulations and Practices indicators in the four readings:

The results of the fourth reading according to the Regulations and Practices indicators show that the Regulations sector received a “Very Advanced” rating, which is the same rating as the first three readings, while the Practices sector received a “Medium” rating after being rated “Low” in the first two readings. Table 13 shows the number of indicators in each sector, their numbers, and their average score.

Table (13): Comparing average index score for Regulations and Practices sectors

#	Sectors	Number of Indicators	Indicators' Number	Sector's relative weight	Average score per sector after weighing in the first reading	Average score per sector after weighing in the second reading	Average score per sector after weighing in the third reading	Average score per sector after weighing in the fourth reading
1	Regulations Indicators	17	.34 .23 .14 .13 .4 .1 .53 .50 .46 .44 .38 .35 80 .72 .66 .65 .63	21%	82	84	84	87
2	Practices Indicators	63	-24 .22-15 .12-5 .3 -2 .45 .43-39 .37-36 .33 .62-54 .52-51 .49-47 .75 -73 .71-67 .64 .79-76	79%	49	48	54	55

Thirteen indicators maintained the same rating as in the four readings, and the indicators that maintained their score are:

- Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment.
- A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders.
- A clearly defined process of the budget planning cycle is in place. Budget planning departments are established and independent.
- Legislation is in place, covering all procurements of the security sector without exception.
- Regulations on procurement bodies stipulate a full understanding of the cases of corruption.
- The oversight body for security sector procurements is independent.
- Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest.
- Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported.
- Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process.
- Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption.
- The law prescribes specific penalties for corruption offences.
- There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals.
- A policy is in place to announce results of the trials of security personnel.

One indicator has maintained the same rating in the last three readings: There is a system for classifying information in line with the law to ensure the protection of information. Two indicators maintained the same rating in the last two readings: 1) The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria. 2) The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector. In contrast, the index's rating for civil society organizations and think tanks discussing Integrity, Transparency and Corruption in the security sector rose from "Medium" to "Very Advanced." The index's rating for civil society organizations and think tanks discussing Integrity, Transparency and Corruption in the security sector rose from "Medium" to "Advanced."

The Practices sector score in the fourth reading increased from the third reading by one point (54 vs. 55) and remained at an "Intermediate rating". The Practices sector includes sixty-three indicators, thirty-three of which maintained the same rating in the four readings, while nine indicators maintained a "Very Advanced" rating:

- Regulations on security sector procurements are enforced effectively.
- Oversight of security sector procurements is efficient.
- A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications.
- Adequate actions are taken against all contract violations.
- Staff receive their salaries on time.
- The payment system is well-prepared, regular and public.
- Salaries and increments are publicly accessible.
- A code of professional conduct is applicable
- The code of professional conduct is disseminated to security personnel and is publicly available

Four indicators maintained an “Advanced” rating:

- Compliance units within the security sector are effective.
- An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions.
- The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases.
- Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits.

The fourth reading of the thematic area shows that nine indicators remain in the “Low category,” as in the first three readings:

- Needed financial and human resources are made available at compliance departments and units.
- Compliance departments and units are independent.
- Findings of the SAACB audit reports on security agencies are published.
- Details of all procurements are available.
- Data on procurements are published, usually in an accessible format.
- All contracts, including modifications after tenders are awarded, are publicly accessible.
- Allowances paid to civil servants and security personnel are published and accessed by the public.
- Results of trials are made publicly available.
- Recruitment in senior positions at the Intelligence service is affected by favoritism.

The fourth reading shows that eleven indicators from the Practices sector remain in the Critical category, namely:

- Effective PLC oversight of security agencies.
- The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector.
- Annual audit reports on security agencies are submitted to the PLC.
- The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB.
- The security policy or security strategy is deliberated by the PLC.
- PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector.
- The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs.
- The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures.
- Officials regularly produce audit compliance reports on contracts and achievements.
- A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies.
- An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates.

Two indicators maintained the same rating in the last three readings: Indicator 28 on the disclosure of the vast majority of the security sector budget to the media and civil society actors was rated Critical, and Indicator 37 on the existence of a manual of procedures for public procurement and tenders was rated Advanced.

Ten indicators maintained the same rating in the last two readings, with two indicators maintaining a Very Advanced rating: Indicator (22): Integrity assessment results are utilized in new policies and planning, and Indicator #33: Recommendations issued by the Financial and Administrative Control Bureau are utilized. Two other indicators maintained the "Advanced" rating: Indicator (57): The security sector has been facing the issue of ghost employees for the past five years, and Indicator (75): Effectiveness of oversight of intelligence services activities, management, and budgets. Six indicators maintained a Low rating:

- Anti-corruption policy is reflected in the Security Sector Action Plan, and implementation is progressing according to schedule.
- The challenging environment that enables corruption in the security sector is reviewed.
- Corruption risk assessments are conducted periodically.
- Information requested by citizens, media, and civil society on the security sector budget is available in a timely manner.
- The Financial and Administrative Control Bureau regularly audits security sector spending and assesses security sector performance.
- Cases of procurement corruption are investigated or prosecuted without undue political influence.

According to the fourth reading, five indicators had a higher rating compared to the previous reading:

- The security sector makes information on the number of civilian and security personnel available to the public.
- The size of the salaries of civilian and security personnel are made public.
- Security sector organizations publicly commit through speeches or media interviews to anti-corruption and integrity measures.
- Whistleblowing is encouraged through training, information and guidance regarding whistleblowing processes and whistleblower protection procedures.
- Anti-corruption training is conducted for security and civilian personnel.

On the other hand, the ratings of five indicators from the Practices sector declined compared to the third reading:

- Right of access to updated documents and information on the security sector policy or security strategy is safeguarded.
- There are indications that security institutions are open to civil society organizations.
- The security sector budget includes comprehensive and detailed information on expenditures according to respective functions.
- The security sector budget is publicly available, disaggregated and clearly defined before it is enacted.
- The proportion of discreet expenditures earmarked to Intelligence agencies (General Intelligence and Preventive Security services).

● Sub-indicator scores by pillars in the four readings

Table 14 below indicates that the ratings of the Integrity sub-indicator scores in the four readings remained the same with limited changes in the scores of all the pillars.

Table (14): Comparison of Average Index Score for the Integrity Pillar in the Four Readings

Integrity Pillar	No. of Indicators	Reading I		Reading II		Reading III		Reading IV	
		Average score per pillar	Rating	Average score per Pillar	Rating	Average Score per Pillar	Rating	Average Score per Pillar	Rating
Transparency	24	49	Low	38	Low	49	Low	46	Low
Accountability	36	56	Average	60	Average	63	Average	65	Average
Integrity	20	66	Ad-vanced	69	Ad-vanced	70	Ad-vanced	76	Ad-vanced
Total	80	56		55		61		62	

Transparency Pillar:

The Transparency Pillar remained in “low” rating. Although the score dropped by the points, fifteen out of twenty-four indicators preserved the same rating in the fourth reading, compared to the third one. They are:

- PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector.
- A clearly defined process of the budget planning cycle is in place. Budget planning departments are established and independent.
- The greatest portion of the enacted security sector budget is fully disclosed to the media and civil society actors.
- Information requested by citizens, media outlets, and civil society on the security sector budget is provided in a timely fashion.
- Findings of the SAACB audit reports on security agencies are published.
- Legislation is in place, covering all procurements of the security sector without exception.
- Details of all procurements are available.
- Data on procurements are published, usually in an accessible format.
- All contracts, including modifications after tenders are awarded, are publicly accessible.
- Officials regularly produce audit compliance reports on contracts and achievements.
- Allowances paid to civil servants and security personnel are published and accessed by the public.
- A policy is in place to announce results of the trials of security personnel.
- An information classification system is established in consistence with the law with a view to ensuring protection of information.

Two indices rose: 1) The security sector allows public access to information on the number of civil servants and security personnel. 2) The size of the wage bill of civil servants and security personnel is made publicly available. On the other hand, five indices were downgraded: 1) Right of access to updated documents and information on the security sector policy or security strategy is safeguarded.

2) There are indications that security institutions are open to civil society organizations. 3) The security sector budget includes comprehensive and detailed information on expenditures according to respective functions. 4) The security sector budget is publicly available, disaggregated and clearly defined before it is enacted. 5) The proportion of discreet expenditures earmarked to Intelligence agencies (General Intelligence and Preventive Security services).

Accountability Pillar

The fourth reading shows that thirty-one of the thirty-six indicators remain in the same classification as in the previous reading, and the scores remain the same. The rating of two indicators increased: 1) Official oversight agencies in Palestine diligently monitor the performance of security agencies in the West Bank. 2) Civil society organizations and research centers discuss the issues of integrity, transparency and corruption within the security sector.

Integrity Pillar

The fourth reading shows that sixteen indicators from the Integrity pillar remained in the same classification out of twenty indicators, the scores remained the same, and the indicators that maintained the same classification were:

1. The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector.
2. The anti-corruption policy is reflected in the security sector's plan of action. Implementation makes progress in line with the set timeframe.
3. Needed financial and human resources are made available at compliance departments and units.
4. Compliance departments and units are independent.
5. Regulations on procurement bodies stipulate a full understanding of the cases of corruption.
6. The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases.
7. Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits.
8. The security sector has faced the problem of ghost employees over the past five years.
9. Staff receive their salaries on time.
10. The payment system is well-prepared, regular and public.
11. The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria.
12. There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals.
13. A code of professional conduct is applicable.
14. The code of professional conduct is disseminated to security personnel and is publicly available.
15. Recruitment in senior positions at the Intelligence service is affected by favoritism.
16. An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates.

Three indicators in the Integrity pillar rose in the fourth reading: 1) In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures. 2) Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers. 3) Security personnel and civil servants receive anti-corruption training.

Findings and Recommendations

Findings:

The periodic Integrity Index of the Palestinian security sector monitors (the changes in the immunity system of the security sector and its effectiveness in preventing the risks of corruption. It applies to (80) indicators that govern the sector's work, areas, pillars, legislation and current practices. These include the level of compliance with a set of values that govern the work of the officials responsible for combatting corruption and safeguarding public funds. The Index also assesses the level of observance of the bases and principles of transparency in their work and evaluates the effectiveness of the systems that hold them to accounts.

I. General Findings:

1. The Integrity Index in the Palestinian Security Sector scored average, indicating that corruption risks or “opportunities” are still possible. The integrity system in the Palestinian security sector is at the inception phase, requiring further steps to fulfill conditions for building an effective integrity system in this sector.
2. The index results showed that the major challenge to the integrity system in the Palestinian security sector lies in practices, which scored lower than regulations. Characterized as either short or ineffective, the latter were still rated as advanced.
3. It was clearly shown that the most significant challenge was posed by two aspects: (1) inadequate tools of oversight of Intelligence agencies, and (2) weak political will. Crucially, an inactive PLC has greatly impacted scores of the Integrity Index in the Palestinian Security Sector. By contrast, procurements and tenders, and recruitment and personnel conduct, were rated as advanced. Specialized and internal government units provide oversight mechanisms and techniques. The security establishment also demonstrates a will to improve security personnel's performance.
4. The index showed that regulations were generally available. However, there is a distinct lack in regulations on oversight of Intelligence agencies, resulting in unclear mechanisms that help to consider how appropriate candidates are to command these agencies. Also lacking are regulations on the promotion of transparency given that a law on the right of access to information and a regulation on document classification have not so far been enacted. These legislative acts should outline mechanisms for accessing information and documents kept by security agencies and government bodies. They also set the prescribed duration for public disclosure of information.
5. Ratings showed that the indicators of transparency were the weakest in all three pillars of the integrity system in the security sector. While accountability and integrity were rated as “average”, transparency scored low.

II. Detailed Findings

1. Some Palestinian regulations inadequately provide for immunizing the integrity system with- in the Palestinian security sector, e.g. the right of access to information.
2. According to the index results, oversight bodies' role is undermined by inactive PLC due to the internal Palestinian political divide. As a result, parliamentary oversight of the security sector has

been debilitated, clearly impacting political will, practices, and accountability. Of the 11 indicators of the PLC powers of control over the security sector, nine were rated as critical because of a dysfunctional parliamentary process. These nine indicators account for some 11 percent of the total index weight.

3. Indicators of transparency continue to be weak. For example, regular public consultations on the security sector policy and security strategy do not take place. Lack of dissemination of detailed information about the security sector budget before its enactment. The right to access updated information and documents about the security sector policy and security strategy is weak. The share of undisclosed items of the budget of intelligence services (General Intelligence Service and Preventive Security Forces).

4. Due to the government's non-disclosure of the budget, several indicators score dropped to "critical rating". These include the indicators related to public disclosure of detailed and clear budget before its enactment. The majority of the approved security sector budget is shared fully with the media and civil society actors.

5. An information classification system is not established in consistence with the law to ensure protection of information and allow the publication of documents. A few details are provided about the security sector budget before it is enacted.

6. Candidates' fitness for the job is not assessed by an external committee like the governance integrity committee.

7. A specialized, independent governmental committee (e.g. National Security Council) is in place to control policies, management and budget allocations to Intelligence agencies.

8. Compliance departments and their units "Internal Control Services" need more attention and be provided with the necessary financial and human resources and autonomy to achieve the purpose of their establishment.

9. Despite the improvement in the last two readings, managing corruption risks in the security sector still requires further review of the challenging environment that enables corruption in the security sector, and conducting such assessments periodically, to utilize the results of the integrity assessment in new policies and planning, especially when preparing the national security sector strategy.

10. There has been a noticeable improvement in the current reading on the evidence of security sector institutions practicing openness towards civil society organizations in the area of policy discussion. It is necessary to open up to civil society organizations, especially in the absence of the Legislative Council, as the legislation issued and published in the Official Gazette still does not cover all procurement related to the security sector. It also needs to develop a manual of procedures for public procurement and tenders in the security sector.

11. Procurement in the security sector should disclose more details on purchases and publish procurement data in an accessible form, including the changes made after the award of a bid.

12. The security sector budget provides limited information on the expenditure. The majority of the approved public sector budget is not shared with the media or civil society actors.

13. The SAACB continues to restrain publication of results of security sector audits. The Bureau only releases a summary of its operations within security sector institutions in the SAACB annual report.

14. The size of the allowances, travel missions, and financial allocations to certain civil and military staff is minimally publicized or publicly accessible.

15. Despite administrative development (approving structures and developing job descriptions for each position), the criteria for appointing security personnel to supervisory and senior positions, such as heads of military agencies and bodies, are still limited, especially since they are conducted without any evaluation processes based on objective criteria from an external committee, or publicizing the criteria by which people are selected for these positions. Partisan favoritism remains influential despite attempts to separate the security services from political organizations.

Recommendations

To enhance the immunity of the Palestinian Political System, including the security sector's integrity system and effectiveness, joint efforts and strong pressure are necessary for board mobilization to end the political split and organize general elections with the participation of all political parties. The intuitions of the Palestinian Political System should unite to address the gaps highlighted in this index.

• Political level

1. Although it's difficult to hold general elections due to the ongoing war in Gaza, and the need to prioritize ceasefire and addressing the devastating impacts on the Palestinian citizens in Gaza, political reform remains essential to reform the security sector and promote integrity. Such reform requires setting a date for general elections to enable citizens to elect their representatives in political institutions and re-activate parliamentary oversight of the executive power, including the security sector.

2. The National Security Council should be re-established as a government "body" vested with overseeing and supervising security and intelligence agencies and their administrations, budgets and hold them to account.

To the Government:

1. Promulgate the Right to Access to Information Law and the Government Document Classification System, which define the mechanisms for dealing with security and government information and documents, and the authorized time period for their release to enhance transparency in the security sector.

2. Establish a "Public Sector Governance Quality Committee" composed of experienced and impartial figures to review the appointments of candidates for senior positions (both civilian and security, including heads of security agencies and military institutions) in the public sector, according to objective criteria, and to examine the suitability of candidates for these positions.

3. Appoint an Inspector General of the Palestinian Security Forces, who reports directly to the political level, to turn the security establishment into a professional organization that is subject to oversight and inspection in the performance of its duties.

4. Publish the detailed budget, as in previous years, so that civil society watchdogs can monitor expenditures on the security sector, and their size, within the general budget.
5. Issue a special financial regulation for the security establishment and publish it in the Official Gazette instead of maintaining the unpublished exceptional financial regulation, which is renewed annually by the Minister of Finance.
6. Issuing the special regulation for procurement of a security nature stipulated in the Public Procurement Law, which covers all procurement related to the security sector, and preparing a procedures manual for public procurement and tenders in the security sector.

To the Ministry of Interior

1. Establish a risk management and compliance unit in the security sector, review the challenging environment that enables corruption in the security sector, examine the management of corruption risks in the security sector, and conduct periodic assessments to utilize the results of the assessment in the planning and policies of Palestinian security sector agencies and institutions.
2. Expand regular consultations with the public on security policy and strategy.

To the Security Agencies and Supporting Military Bodies

1. Issuing annual reports that include achievements, challenges, and the extent to which members of the security services comply with the law and the code of ethical behavior.
2. Strengthen the capacities of compliance departments and its units “internal control and inspection departments in security sector organizations” by providing qualified human resources, the necessary financial resources, and enhancing their independence, by subordinating them to the Minister of Interior/Inspector General in the Ministry of Interior to achieve the purpose of their establishment.
3. Enhance the transparency of procurement processes in the security sector by publishing procurement data in an accessible format and making all contracts available to the public, including amendments after the awarding of tenders.
4. Provide details of the security sector budget before it is approved. Provide information on the approved security sector budget to the media and civil society actors, as well as clearly publicize the size of special allowances for civilian and security personnel.
5. Openness of the centralized financial administration (the military and the Ministry of Finance) to provide information requested by citizens, the media, and civil society on the security sector’s budget in a timely manner.

Appendix (1): List of indicators of the Security Sector Integrity Barometer and their calculation methods

No.	Indicator	Score calculation mechanism
Political Will		
1	Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment	4-The PLC enjoys broad mandate under the law to approve, reject, or amend laws related to security. It also approves the security sector's policy and amends it. It also has the right to review the security sector's budgets and decisions. 2- The PLC has the right to use official mechanisms to oversee the security sector's policies. It however lacks some powers detailed in Finding 4. 0- The PLC does not have any official mandate on the security sector's policies or laws.
2	Effective PLC oversight of security agencies	4- The Legislative Council regularly approves or rejects security-related laws and exercises and approves budgetary authority. It can also reject or amend security sector policy. 3- The Legislative Council performs all the functions listed in Finding 4, but not consistently. There are clear instances where the Legislative Council has failed to effectively monitor security sector policy, but these are occasional lapses. 2- The Legislative Council discusses or reviews security sector policy and attempts to influence policy through formal mechanisms, but these attempts are limited. 1- The Legislative Council discusses or reviews security sector policy, but does not utilize its formal oversight powers. It may exert informal influence on policy in the absence of formal powers. 0 - The legislature does not discuss or review security sector policy.
3	The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector	4- Neither the executive nor the security authorities have the right to force or unduly influence the Legislative Council to vote in their favor. 2- The executive branch does not force or unduly influence the Legislative Council to vote in its favor, but the presence of security officials within the Legislative Council undermines parliamentary oversight of defense. 0-Both the security services and the executive regularly undermine the PLC's oversight of security sector policy.
4	A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders	4-There is a parliamentary committee (the Internal Affairs and Security Committee) with extensive rights. The Committee has the power to scrutinize any aspect of the functioning of the Ministry or security sector agencies, such as budgets, personnel management, policy planning and demand information relating to these areas. The committee is in a position to require expert witnesses to appear before it. 2- There is a parliamentary committee (the Interior and Security Committee) that has some formal mechanisms for conducting oversight of security sector policy, but it lacks some of the powers mentioned in Outcome 4. 0-There is no parliamentary committee tasked with overseeing and monitoring the security sector, or the committee may exist, but it has no formal powers.
5	Official oversight agencies in Palestine diligently monitor the performance of security agencies in the West Bank.	This indicator is calculated according to the following formula: (Percentage who say there is serious oversight x 100) + (Percentage who say no opinion/don't know x 50) + (Percentage who say there is no serious oversight of the security services x 0).
6	Annual audit reports on security agencies are submitted to the PLC	4-Legislators are provided with detailed audit reports related to the security sector and other classified programs. Audit reports address all major and minor expenditures, compare expected and actual impact, and include strategic recommendations associated with weaknesses or challenges. 3-Legislators are provided with audit reports for classified items that address most expenditures, but provide only general recommendations. They may not comparatively address the expected and actual impact. 2- Legislators are provided with audit reports for confidential items that exclude some details. There may be an absence of impact assessment and/or recommendations. 1- Legislators are provided with audit reports for confidential items that provide basic or very brief information, and there is a large number of omissions. Both impact assessments and recommendations may not exist. 0 - Legislators are not provided with audit reports for classified items, or classified programs are not audited at all.

7	The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB	4- The Legislative Council interrogates the security agencies regarding the findings and requires them to provide documents or evidence regarding the inclusion of the audit recommendations. It also highlights any deficiencies in the audit process. 3- The Legislative Council questions the security services regarding the findings, but may not require them to follow up on the recommendations. However, it does not comment on the quality of the audit process. 2- The Legislative Council questions the security agencies regarding the findings, but does not obligate them to follow up on the recommendations, nor does it comment on the quality of the audit process. 1- The legislature discusses the audit findings, but does not press the security services for responses, nor does it comment on the quality of the audit. 0- Legislative discussion regarding the contents of audit reports may be limited or non-existent.
8	The security policy or security strategy is deliberated by the PLC	4- The executive, legislature, civil society organizations, and the public debate security sector policy or security strategy (public debate includes the media, interviews, op-eds, and articles). 3- The executive and legislative branches, civil society organizations, and the public discuss security sector policy or security strategy. The discussion includes public debate, media, interviews, op-eds, and articles. However, the debate is inconsistent and unsustainable over time. 2- The executive and legislative branches, civil society organizations, and the public discuss security sector policy or security strategy, but not on an ongoing basis. There is no in-depth dialog with the media or civil society actors. 1- Individuals in executive positions talk about security sector policy or security strategy, but there is little effective discussion or debate. 0- Security sector policy or strategy has not been discussed in the past year at all.
9	PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector	4. The discussion is in-depth and addresses all of the following issues: (1) Clear disclosure of the security threats facing the country. (2) Procurement decisions (five-year plan) and the level of spending on the security sector. (3) Correlation between threats, personnel and budget. (4) Operational capacity utilization of the security sector. 2- The discussion of security sector policy or security strategy focuses primarily on potential and existing major threats and the level of security sector spending. 0-The discussion of security sector policy or strategy is superficial and does not address key issues.
10	Regular consultations on the security sector action plan and security strategy take place with the public	This indicator is calculated according to the following formula: (Percentage who say they are familiar with the agency's strategy and action plan x 100) + (Percentage who say no opinion/don't know x 50) + (Percentage who say they are not familiar with the agency's strategy and action plan x 0)
11	Right of access to updated documents and information on the security sector policy or security strategy is safeguarded	4. The public has easy access to documents and regularly updated information on all aspects of security sector policy or security strategy. Documents are released at least four weeks before decisions are made to allow for public scrutiny. 3- The public has easy access to documents and regularly updated information on all aspects of the security sector policy or security strategy. However, documents are not released with sufficient notice before decisions are made. 2- Although information and documents are generally complete, they are not available on all aspects of security sector policy or strategy, and their release may be significantly delayed. 1- Information and documents related to the security sector policy or strategy are only partially or briefly available to the public. 0. Security Sector Policy or Security Strategy documents are not released to the public at all.

12	There are indications that security institutions are open to civil society organizations	4-Security sector institutions specifically engaged with civil society organizations on corruption issues on a regular and/or in-depth basis. This includes not only the government's civilian representative, but also security representatives. 3-Security sector institutions are open to CSOs, but work infrequently or superficially on corruption issues. Security agencies do not involve civil society organizations in corruption cases. 2-Security sector institutions seek (or are beginning to seek) the involvement of CSOs, but not in corruption cases. There has been some consideration of engaging CSOs, and there may have been meetings with the security sector, but these appear to be with CSOs that support the government or are explicitly funded by the government. Or CSOs have very little activity in this area, and security sector organizations are rarely involved for this reason. 0-Requests from CSOs to work with the security sector have been denied.
13	Civil society organizations and research centers discuss the issues of integrity, transparency and corruption within the security sector	4- Outside the government, there is a regular public debate among academics, journalists, thought leaders, and civil society organizations on security sector issues. The debate on high-priority issues is sustained over a period of time, rather than being addressed superficially. 3- Outside the government, there is an occasional public debate among academics, journalists, thought leaders, and civil society organizations on security sector issues. However, when a debate does take place, it addresses high-priority issues in an intensive and in-depth manner. 2- Outside the government, there is regular public debate among academics, journalists, thought leaders, and civil society organizations on security sector issues. However, the debate often addresses issues superficially rather than following up with regular in-depth discussion. 1- Outside the government, there is a seasonal public debate among academics, journalists, thought leaders, and civil society organizations on security sector issues. The debate addresses the issues superficially rather than following up with an in-depth and systematic discussion. 0- Outside of government, there is no or very limited public debate among academics, thought leaders, and civil society organizations on security sector issues.
14	The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector	4. There is an explicit and effective anti-corruption policy for the security sector. 2- There is an explicit anti-corruption policy, but it is unclear whether it applies to the security sector or whether the government is in the process of developing a policy that explicitly applies to the security sector. 0- There is no anti-corruption policy, or there is one, but it does not explicitly apply to the security sector.
15	The anti-corruption policy is reflected in the security sector's plan of action. Implementation makes progress in line with the set timeframe	4- The action plan at the ministry level reflects the system's institutional weaknesses, and implementation has progressed according to the estimated timeline. 3- There is a ministry-level action plan that reflects the system's institutional weaknesses. While steps have been taken to implement the plan, they are behind schedule, or implementation does not address the prioritized items in the action plan. 2- There is a ministry-level action plan that reflects institutional weaknesses in the system, but no actions have been taken to implement it. 1- There is an action plan at the ministry level, but it is superficial and does not address the institutional weaknesses in the system. 0- There is no action plan to implement the policy, and no actions have been taken.
16	Needed financial and human resources are made available at compliance departments and units	4. There are specific security sector compliance and ethics units tasked with addressing security sector integrity and corruption, and they are staffed and funded. 3- There are specific compliance and ethics units in the security sector tasked with addressing integrity and corruption in the security sector, but there are some weaknesses in terms of staffing, funding or expertise. 2- The security sector has compliance and ethics units, but there are significant weaknesses in staffing, funding, and expertise, or their mission is unclear. 1- There is no evidence that such units exist, but there is evidence that the country is making proactive efforts to establish them. 0- There are no compliance or ethics units, and no efforts are being made to establish them. Indicator Notes: Where institutions exist, they should have a mandate to engage with security sector institutions and actually use that mandate. So, if there is a unit in another department, we will look for evidence that it has a mandate to engage security sector organizations, and that it has exercised that mandate.

17	Compliance departments and units are independent	4. Departments and units are not within the chain of command of the security sector organizations they oversee. They report directly to a senior member of the security sector (e.g. the Commander-in-Chief/Minister of Interior). 2- Departments and units may be within the chain of command of the security sector organizations they oversee. However, these organizations cannot shut them down. 0-Departments and units are subject to political control or misuse. Security sector organizations can terminate the work of the organizations .
18	Compliance units within the security sector are effective	4. Employees within units are aware of corruption risks to their organizations, are able to deal with risks independently, and ensure that other departments or units deal with risks appropriately. Actions to deal with the risks may include training, supervision, or policy recommendations. 3) Staff within units are aware of corruption risks to their organizations and are able to deal with some risks independently. However, they cannot ensure that other departments or units are able to adequately address the risks. 2- Employees within units are aware of corruption risks to their organizations, but cannot adequately or appropriately address the risks, either through their own work or by persuading others. 1- Employees within the units are aware of corruption risks to their organizations, but are unable to prepare an effective action plan that includes appropriate mitigation measures to address the risks. 0 - These organizations or units are not aware of the corruption risks within them.
19	The public are confident that security officials are seriously willing to combat corruption	This indicator is calculated according to the following formula: (Percentage of those who are confident that security sector officials want to fight corruption x 100) + (Percentage of those who say no opinion/don't know x 50) + (Percentage of those who are not confident that security sector officials want to fight corruption x 0).
20	Challenges that furnish an opportunity for corruption in the security sector are reviewed	Corruption risks are clearly identified, and individual departments conduct their own risk assessments in a process that reflects a culture of assessing corruption risks. 3- Corruption risks are clearly identified, but are conducted in relation to the ministry or armed forces as a whole, rather than focusing on individual agencies. 2- A partial corruption risk assessment has been conducted, but does not clearly articulate the risks related to the Ministry or the Armed Forces. There is some awareness of areas of risk, but no formal risk assessment has been carried out for the ministry or the armed forces as a whole, or within individual services. The government may have commissioned or participated in ad hoc assessments conducted by external parties or agencies. 0. No specific corruption risk defense assessment has been conducted or participated in during the previous two years.
21	Assessments of risks of corruption are provided on a regular basis	4- Risk assessments are conducted on an annual basis, or more frequently. 2- There is a schedule for conducting risk assessments, but they are conducted on a less than annual basis. 0 - There is no regular schedule for conducting risk assessments.
22	New policies and plans are informed by findings of the integrity assessment	4-Risk assessment results are used to develop and regularly update anti-corruption policy and organizational action plans. 2- Risk assessment results may be used to develop an anti-corruption policy or action plan, but are not used to regularly update the policy or practice. 0-Risk assessment results are not used to inform anti-corruption policy or practice.

Security sector budget		
23	A clearly defined process of the budget planning cycle is in place. Budget planning departments are established and independent	4-There is a clear process for the entire budget planning cycle, with formally independent internal budget planning functions, such as budget and finance. Linkages between private procurement and security sector strategy requirements are authorized. 3- There is a clear process for the entire budget planning cycle, but internal budget planning functions are not independent, such as budget and finance. Linkages between private procurement and SSR requirements are authorized. 2- There is a process for the entire budget planning cycle, and internal budget functions are independent, such as budget and finance. There are few, if any, explicit linkages between private procurement and SSR requirements. There is a budget planning process, but it is not clear, and internal functions are not segregated. There are few, if any, explicit linkages between private procurement and SSR requirements. 0 - There is no defined budget planning process.
24	The security sector budget includes comprehensive and detailed information on expenditures according to respective functions	4. The security sector budget includes comprehensive and detailed information on expenditures by function. The information includes personnel (salaries, allowances and incidentals), security research and development, training, construction, procurement and acquisitions, equipment maintenance, asset disposal, and administrative expenditures (security sector or other services). 3) The security sector budget includes comprehensive information on expenditures across functions, but information on some of the functions listed in Outcome 4 may not be available in detail. 2- The security sector budget may not fully cover some of the areas listed in Outcome 4, or the information provided may be overly aggregated or ambiguous for some functions. 1 - The total expenditure figure for the security sector budget is published, but not broken down into functions or areas. 0 - No budget information is available.
25	The PLC receives an accurate security sector budget proposal in accordance with the 1997 Law on the Regulation of the Public Budget and Financial Affairs	4. The Legislature shall receive an accurate security sector budget proposal two to four months before the start of the budget year. 2- The Legislature shall receive an accurate security sector budget proposal less than two months before the start of the budget year. 0- The legislature does not receive any information or receive misleading or inaccurate information about the proposed security sector expenditures.
26	The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures	4. The Committee has made some adjustments to the budget, and there is evidence that in some cases it has led to changes in the budget. The committee is involved in reviewing semi-annual expenditures, and can delete expenditures before they are incurred. 3- The Security Sector Committee performs all the functions listed in Finding 4, but it may not be timely, or there may be some clear cases where the committee fails to effectively monitor aspects of the budget before the start of the fiscal year. 2- The SSC reviews the security sector budget and attempts to influence budgetary decisions through formal mechanisms, but these attempts are limited. 1- The SSC reviews the security sector budget, but fails to utilize its formal oversight powers. It may exert informal influence on the budget in the absence of formal powers. 0- The Security Sector Committee has no influence on the decision-making process for the security sector budget.
27	The security sector budget is publicly available, disaggregated and clearly defined before it is enacted	4. The approved security sector budget is published in detail. It is accompanied by an explanation of the budget for experts, as well as a short summary in plain language for non-experts. 2- The approved security sector budget is made public in a detailed manner and provides some budgetary clarification, but it is superficial. 0. The approved security sector budget is not publicly available at all.

28	The greatest portion of the enacted security sector budget is fully disclosed to the media and civil society actors	4- The vast majority of the approved security sector budget is fully disclosed to the media and civil society actors. There may be some exceptions made for legitimately sensitive areas, but there is clear and strong oversight of the entire budget by other appropriate authorities. 2- Most areas of the approved security sector budget are not published in detail, but there is still evidence of oversight by other appropriate authorities. Some areas of the budget are not disclosed, but this is not explained or justified to the public. 0 - Most areas of the approved security sector budget are not available to the public.
29	Information requested by citizens, media outlets, and civil society on the security sector budget is provided in a timely fashion	4- Information requested by citizens, media, and civil society on the security sector budget is provided in a timely manner, without systematic or unjustified delays. There are a few instances where information is denied or inappropriately redacted for national security reasons. 3- Information requested by citizens, media, and civil society on the security sector budget is available, but there may be unjustified delays. There are a few instances where information is denied or inappropriately redacted for national security reasons. 2- Information requested by citizens, media, and civil society on the security sector budget is available, but there may be occasional delays for no apparent reason. There may also be a pattern of information being denied or inappropriately redacted for national security reasons. 1- There are serious and systematic deficiencies in the release of information. This may be in specific areas, or access to requested information may vary according to the identity of the individual or organization requesting the information. 0- It is extremely difficult or impossible to obtain any of the budget details.
30	An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions	4- The Internal Audit Unit is involved in ongoing reviews of security sector organizations' expenditures and has the flexibility to prepare its work program for the year. The experience of its staff is appropriate (e.g., low staff turnover). Its results are evaluated by the security sector organizations. 3- The Internal Audit Unit is involved in ongoing reviews of Ministry of Security Sector expenditures, but does not have the flexibility to prepare its work program for the year. Staff expertise is generally adequate, and results are assessed by security sector officials. 2- The Internal Audit Unit engages in ongoing reviews of security sector organizations' expenditures, but there are questions about their effectiveness. Staff expertise may not be adequate, or the results may not be assessed by the Minister of Interior and National Security. 0- The Internal Audit Unit engages in irregular and superficial reviews of the security sector supervisor's expenditures. 0 - There is little or no internal audit of the security sector ministry's expenditures.
31	The SAACB regularly audits the security sector spending and evaluates the security sector performance	4- The Financial and Administrative Control Bureau is in charge of auditing the security sector, and regularly audits security sector spending in an in-depth formalized process. Both financial audits and performance audits (best value for money) are conducted for security sector spending. 3- The Financial and Administrative Control Bureau (FAB) is in charge of auditing the security sector, and regularly audits security sector spending in a formal and in-depth process. The audit consists primarily of financial audits, not performance audits. 2- The Financial and Administrative Control Bureau has a security sector audit function and audits security sector spending on a semi-regular, formalized basis. Only audits related to financial and compliance aspects are conducted. 1- The Financial and Administrative Control Bureau has a mandate to audit security sector organizations, but it does not do so regularly or in depth. There may be regular deviations from formalized processes. 0 - There is little or no external auditing of security sector organizations' expenditures.

32	Findings of the SAACB audit reports on security agencies are published	4- External audit information is published online (in compliance with current FOIA regulations within a reasonable period of time and in detail, including, for example, analysis of audited accounts, oral statements, expert advice, and investigative work). 2- External audit reports are published online (e.g., reports on audited accounts, oral statements, expert advice, investigative work), but with some redactions or in a summarized form or with only a superficial treatment of the issue, and may not be available within a reasonable period of time. 0- External audit reports are rarely published online, but are available upon request.
33	SAACB recommendations are capitalized on	4- The Ministry (security organizations) regularly address the results of audits of their practices. 2- The ministry (security organizations) sometimes addresses the results of the audit of their practices, but not regularly. 0- The ministry (security organizations) does not address the results of the audit of their practices, or only make minor changes.
Procurement and bidding		
34	Legislation is in place, covering all procurements of the security sector without exception	4- The country adopts clear and comprehensive legislation covering all security sector procurement without exception. 2 - The country has legislation that covers security sector procurement, but it may be vague, so there are exceptions, such as special/classified matters. 0- The country adopts defense legislation that addresses security sector procurement.
35	Regulations on procurement bodies stipulate a full understanding of the cases of corruption	4- The Regulations direct procurement authorities to familiarize themselves with corruption-related issues. The Regulations recognize corruption risks and make clear and comprehensive provisions to mitigate these risks. 2- The country has legislation that addresses procurement in the security sector, but rarely addresses corruption risks. Regulations superficially recognize corruption risks, or make vague provisions on how to mitigate these risks. 0- The country adopts legislation that addresses procurement in the security sector and refers to corruption risks. Regulations addressing procurement in the security sector do not refer to corruption risks.
36	Regulations on security sector procurements are enforced effectively	4- The Regulations relating to procurement in the security sector shall be strictly applied and shall be followed by everyone for all procurement in the security sector without exception. 2- Procurement in the security sector complies with the Regulations. There are some exceptions, but they are minor. 0- There are statutory exceptions to the procurement requirements set out in the Regulations, which are significant in number or scale.
37	A procedure manual on public procurements and tenders is in place	4- The procurement cycle process for security sector organizations is formalized; from needs assessment, through contract execution and finalization, to disposal of assets. It also details policies and procedures for each stage of the procurement cycle process, and there is evidence that these policies and procedures are followed in practice. 3- The security sector procurement cycle process is formalized from needs assessment, through contract execution and finalization, to asset disposal. It also details policies and procedures for each stage of the procurement cycle process, but there are some shortcomings in terms of implementation. 2- The security sector procurement cycle is partially formalized; from needs assessment, through contract execution and finalization to asset disposal, and/or lacks detailed policies and procedures for each stage of the procurement cycle. 1- Some elements of the security sector procurement cycle are formalized, but there is no evidence that they are being used in practice. 0 - The security sector procurement cycle has not been formalized at all, and there are no policies or procedures for the procurement cycle implementation process.

38	The oversight body for security sector procurements is independent	4- Procurement oversight mechanisms are independent, formalized processes. They are apolitical and their activity is consistent across changes in government. The legislature, security personnel, businessmen, or politically well-connected individuals have no undue influence on their performance. 2- Procurement oversight mechanisms have been formalized, but their activity is inconsistent across changes in government, the legislature, security, businessmen, or politically well-connected individuals may exert undue influence on their performance. 0 - Procurement oversight mechanisms are not formalized, and their activity is inconsistent across changes in government. There may be ongoing undue influence exerted by, for example, the legislature or security personnel.
39	Oversight of security sector procurements is efficient	4- Procurement oversight mechanisms are very active in subpoenaing witnesses and documents, requesting explanations, issuing recommendations or conclusions that are followed or implemented, and their ability to cancel projects can be activated. 2 - Procurement oversight mechanisms are very active, but are not consistently engaged in the activities listed, all together, in Outcome 4. 0 - Procurement oversight mechanisms are highly inactive, or not active at all.
40	Details of procurements are all available	4- Government procurement is made available in detail with almost no exceptions. Very little data is redacted from the tender or contract for reasons of national security. For classified and unclassified procurement, the tender and contract award are disclosed. For a contract, there is a description of the item purchased, the winning bidder, the beneficial owners, the price paid, full life-cycle costs, cost of service, parts costs, and delivery/termination date. 3- Government procurement is made available with almost no exceptions. Most of the information listed in Outcome 4 has been published, but some information is incomplete or abbreviated. 2- Some security sector procurement is not made available. Security or confidentiality is often given as a reason for such secrecy, but this is partially but not fully justified. 1- Some security sector procurement has not been made available, but there is no security justification for withholding this information.
41	Data on procurements are published, usually in an accessible format	4- The data is usually released in an accessible format (e.g. Excel file) which allows for useful comparisons (e.g. how many tenders did the company win). 2- Data is sometimes released in an accessible format. 0 - Data is rarely released in an accessible format.
42	The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases	4- The vast majority (90%+) of procurement for the security sector is conducted under an open competition system, except for some clearly defined and restricted cases. A relatively small component (less than 10%) is done through individual procurement. 3- The majority (70%+) of procurement for the security sector is done through open competition, but a significant percentage of the contract value (10% to 30%) is done through single procurement. 2- Most (50%+) procurement for the security sector is done through open competition, but a significant proportion of the value of contracts (30% to 50%) is done through individual procurement. 1- There is restricted competition (e.g. inviting 2-3 suppliers) in procurement processes for the security sector. 0- The majority of procurement for the security sector is not conducted through open competition.

43	Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits	4- All contracts through sole sourcing and restricted competition should be justified and subject to external oversight (e.g. legislative council, Fiscal and Administrative Control Bureau), which has the authority to reject the competition procedure followed. 3- There are justifications for all contracts made through single/unilateral procurement and restricted competition, and these contracts are subject to external oversight with the authority to investigate the competition procedure followed. 2- Supervisory bodies have the power to investigate the competition procedure and do so in several cases. 1- Supervisory authorities have some authority to investigate the procedure followed; whether through individual/unilateral/restricted procurement competition, and sometimes do so. 0- Supervisory bodies do not have any authority to investigate individual/unilateral or restricted competition procedures.
44	Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest	4- Officials involved in the design of tender specifications, or involved in the decisions of tender boards, are subject to regulations or codes of conduct designed to avoid conflicts of interest. Procurement officials are subject to restrictions on professional activity (e.g: shareholders in contracting companies, board members, consultants, employees of a private company, post-employment work, etc.) and are required to file financial disclosure reports to demonstrate that they and their families do not have financial conflicts of interest in their business. Annual training is available for procurement officials to avoid conflicts of interest. 3- Officials involved in the design of tender specifications, or involved in decisions of tender boards, are subject to regulations or codes of conduct designed for the purpose of avoiding conflicts of interest. Procurement officials are subject to restrictions on professional activity (e.g: shareholders of contracting partners, board member, consultant, officer of a private company, post-employment, etc.) but are not required to file financial disclosure reports. Annual training is provided to procurement officials to avoid conflicts of interest. 0- Officials involved in the design of tender specifications, or involved in decisions of tender boards, are subject to regulations or codes of conduct designed for the purpose of avoiding conflicts of interest. Procurement officials may be subject to certain important restrictions on professional activity. Training for procurement officials to avoid conflicts of interest is available, but is not provided regularly. 1- Officials involved in the design of tender specifications, or involved in the decisions of tender boards, are subject to regulations or codes of conduct designed to avoid conflicts of interest. Procurement officials may be subject to some vague restrictions on professional activity. No training is available. 0- Officials involved in the design of tender specifications, or involved in tender board decisions, are not subject to any regulations or codes of conduct designed to avoid conflicts of interest.
45	A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications	4- There is a comprehensive vetting process that involves administrators in identifying suppliers and designing bid specifications. There is an external verification process to ensure that the built-in specifications identified are necessary. There is an audit process by which officials (including politicians) are involved in making award decisions. 3- There is a comprehensive vetting process in which officials are involved in identifying suppliers and designing the bid specifications. However, there is no external validation to ensure that the specific specifications included are necessary. There is a vetting process that involves officials (including politicians) in making award decisions. 2- There is some level of scrutiny by which officials are involved in identifying suppliers and designing tender specifications. However, there is no external validation to ensure that the specific specifications included are necessary. There may be a vetting process by which officials (including politicians) are involved in award decisions. 1 - A comprehensive audit process is extremely difficult for oversight bodies to access. 0 - Oversight mechanisms do not have access, or there is no detailed audit process for individuals involved in preparing tender specifications, identifying suppliers and awarding the tender.

46	Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported	4- There are formal policies and procedures that define how the supplier's service, and/or delivery obligations are monitored, evaluated, and reported. This includes resolution procedures or sanctions for incomplete or inadequate service delivery. 2- There are some formal policies and procedures, but they do not address all the activities listed in Outcome 4. 0. There are no formal policies or procedures that specify how to monitor, evaluate and report on the supplier's service, and/or delivery commitments
47	All contracts, including modifications after tenders are awarded, are publicly accessible	4. All contracts, including post-award modifications (e.g. change of subcontractor, change of beneficial owner, or additional costs such as hiring a consultant), as well as the monitoring process by which the original contract was awarded and changes are made publicly available. Supervisory bodies receive information and monitor the quality of the product and service delivery. 3) Post-award contract amendments (e.g. change of subcontractor, change of beneficial owner, or additional costs such as hiring a consultant) are not always publicly available, sometimes in a revised form, and the monitoring process by which the original contract was awarded and changes were overseen is not available. Supervisory bodies receive some information that may prevent them from monitoring product quality and service delivery. 2) Post-award contract amendments are often, but not always, publicly available in a revised form. Supervisory bodies receive limited information that may enable them to monitor product quality and service delivery. Information on defaults and contract amendments is rarely released after award. Supervisory bodies receive limited information. 0. There is no transparency in contractors' reporting and delivery obligations.
48	Officials regularly produce audit compliance reports on contracts and achievements	4. Officials regularly produce contract compliance and completion monitoring reports. This includes performance evaluations of suppliers and subcontractors, which are verified separately. If a contract is not adequately fulfilled, action is taken as a result of a breach of contract. 2 - Officials conduct some of the activities listed in Outcome 4, but not on a regular basis. 0. Procurement offices do not implement reporting and delivery obligations at all.
49	Adequate actions are taken against all contract violations	4) All contract violations are adequately acted upon. Issues are either dealt with internally, or raised to senior management in the ministry. If not resolved, cases are referred for further external oversight, for example to the Financial and Administrative Control Bureau and the Legislative Council's Interior and Security Committee. 3) Most contract violations are adequately addressed. Matters are either dealt with internally, or raised to senior management in the ministry. If not resolved, cases are referred for further external oversight, for example to the Financial and Administrative Control Bureau and the Legislative Council's Interior and Security Committee. 2) Most contract violations are adequately addressed. Issues are either dealt with internally, or raised to senior management in the ministry. However, when issues are not resolved, they are generally not referred for further external oversight, e.g. to the Financial and Administrative Control Bureau and the Legislative Council's Interior and Security Committee. 1 - Action is adequately taken on a small number of contract violations. 0 - It is unclear whether action is taken against contract violations.
50	Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process	4) There are formal mechanisms that allow companies to complain about poor procurement practices. This may include both a litigation process and an internal complaint mechanism. 2- In the absence of formal mechanisms, companies use informal communication channels to complain about procurement malpractice. 0 - Firms have no opportunity to complain about procurement malpractice.
51	Mechanisms for filing challenges and complaints by companies are effective and systematically used	4. Complaint mechanisms are available to businesses that are effective, affordable and regularly used. 2 - Complaint mechanisms available to businesses may be ineffective or expensive, but are sometimes used nonetheless. 0 - Complaint mechanisms available to businesses are expensive and ineffective, and therefore rarely used.

52	Companies believe they will not face discrimination in future procurement operations if they file complaints	This indicator is calculated according to the following formula: (Percentage who agree that filing a complaint with the security services without fear x 100) + (Percentage who say no opinion/don't know x 50) + (Percentage who disagree that filing a complaint with the security services without fear x 0).
53	Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption	4. There is clear legislation and operational guidelines from procurement officials to exclude companies and senior company officials when there is a conviction or credible evidence of bribery and corruption-related offenses. 2- Procurement officials have limited authority to exclude companies and senior company officials when there is a conviction or credible evidence of bribery and corruption-related offenses. 0. Procurement officials have no authority to exclude companies or individuals involved in bribery or corruption-related offenses.
54	Cases of corruption in procurements are investigated and offenders are put on trial without any undue political influence	4. Cases are investigated or prosecuted without undue political influence. 3- Cases are investigated or prosecuted, but there is an attempt at undue and sometimes effective political influence in obstructing the prosecution of perpetrators. 2- Cases are investigated, but often not prosecuted. There is clear undue influence in the decision-making process. 1- The perpetrators of the cases are prosecuted ostensibly, or "sham" hearings are held in which the accused are not punished. 0- There is a complete failure to investigate or prosecute, even when there is clear evidence.
Recruitment and employee behavior		
55	Promotions and privileges in security agencies are subject to laws and regulations	This indicator is calculated according to the following formula: (Percentage who say promotions and perks are subject to laws and regulations x 100) + (Percentage who say no opinion/don't know x 50) + (Percentage who say promotions and perks are not subject to laws and regulations x 0).
56	The security sector allows public access to information on the number of civil servants and security personnel	4. The security sector shall make information on the number of civilian and security personnel available to the public on an annual basis, broken down by grade levels. 2- The security sector makes available to the public detailed or summarized information on the number of civilian and security personnel. 0. No information on the number of civilian and security personnel is available to the public.
57	The security sector has faced the problem of ghost employees over the past five years	4. The issue of ghost soldiers has not been an issue for the security authorities over the past five years. 0- The issue of ghost soldiers has been an issue for the security authority over the past five years.
58	The size of the wage bill of civil servants and security personnel is made publicly available	4- Salary rates for civilian and security personnel are published in service publications, broken down by grade levels. Summary information is available to the public, for example on the Ministry's website. 3- Salary rates for civilian and security personnel are published in service publications, broken down by grade levels, but no information is available to the public. 2- Salary rates are only published for a specific category of civilian and security employees. 1- Salary rates for civilian and security personnel are only available in a non-detailed, summarized, or unreliable manner. 0- No information about salary rates is available.
59	Allowances paid to civil servants and security personnel are published and accessed by the public	4- Allowances for all civilian and security personnel are made public, including the eligibility criterion and calculation methodologies. 2- Allowances for all civilian and security personnel are publicized, but this does not include the eligibility criterion and calculation methodologies. 0. No information about the allowances is available to the public.
60	Staff receive their salaries on time	4- Employees receive salaries on time. 3- Salary payments are sometimes delayed, but the situation is rectified within a few days. 2- Salaries are sometimes delayed for 1-3 months. 1- Salaries are always late for up to 3 months. 0- Salary payments are always delayed for up to 3 months

61	The payment system is well-prepared, regular and public	4- Employees receive the correct salaries. 3- There are occasional cases of incorrect salaries, but the situation is corrected within a few days or weeks. 2- Base salaries are sometimes subject to discretionary adjustments. 1- Employees are not guaranteed to receive the correct salaries due to some systemic issues in the payment system. 0- Base salaries are periodically subject to discretionary adjustments.
62	Salaries and increments are publicly accessible	4- The system of salaries and allowances shall be made public. This includes, at a minimum, all of the following: Salary brackets for all positions, broken down by seniority; details on how individual salaries are calculated, including the beginning time of assuming/leaving the position; a list of all allowable allowances and expenses, accrual criteria and limitations; separate managerial, unit and audit responsibilities. 2- There are some shortcomings in Transparency on the payroll system. Two or more of the following are undisclosed: Salary brackets for all positions, broken down by seniority; details on how individual salaries are calculated, including the beginning of the time of assuming/leaving the position; a list of all allowable allowances and expenses, accrual criteria and limitations; separate responsibilities for the management team, the individual's chain of command and internal audit. 0- Payroll system is not published.
63	The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria	4. The recruitment system for security staff, at middle and senior management levels, includes objective criteria for the position, as well as standardized evaluation processes. Promotion boards are clear, are represented by representatives from other branches of the security services, and are regularly attended. The civil service is included for senior ranks. 3) The recruitment system for security staff at middle and senior management levels has objective job descriptions and standardized assessment processes, but there is little independent scrutiny for the promotion of senior staff; for example, promotion boards may not have independent observers. Appointments do not always involve objective job criteria and standardized evaluation processes, for example: Decisions may not be justified by objective criteria, or promotion boards may include members from the chain of command, but this is not widespread or common practice. Formal processes are in place, but they are undermined by the use of undue influence or inappropriate behavior in the promotion process. The civil service is not included in the appointment process at all. 0. There is no established system for recruiting security personnel.
64	In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures	4. There is a clear commitment to anti-corruption and Integrity procedures by the security sector as stated by security sector officials. They demonstrate internal commitment through proactive anti-corruption actions, and regular reporting on Integrity by senior staff in service publications. There is consistency in messaging addressing current violations, and evidence of Integrity implementation. 3) There is a clear commitment to anti-corruption and Integrity procedures by declared security sector officials. Internal commitment is demonstrated through proactive anti-corruption actions, and occasional reporting on Integrity by senior staff in service publications. There may be some inconsistency in messaging between senior officials. 2) There is commitment to anti-corruption and integrity measures by security sector organizations, and prominent members of the security services, but may not be directly reported by staff. There is an internal willingness to implement processes, as evidenced by internal strategic reporting processes. 1- There is very weak commitment on the part of the Minister of Interior and heads of security services, but the Ministry may publish internal communications of an apparent nature to support anti-corruption and integrity measures. 0. There is no internal reporting on commitment to integrity and anti-corruption by security sector organizations, the Chief of Staff, the Chiefs of Staff of the Armed Forces, or the Ministry as an institution.

65	The law prescribes specific penalties for corruption offences	4. There is a set of clearly defined offenses in the law that are fully applicable to the security sector. These include (at a minimum) offering, giving, giving, obtaining or soliciting any item of value to influence the actions of any official or other person responsible for any public or statutory duty. Potential penalties include criminal prosecution/imprisonment, dismissal, as well as significant financial penalties. 3. Bribery and/or corruption are defined by law as forms of crime that clearly apply to the security sector, but two or more of the following mechanisms do not exist in relation to Offering, giving, receiving or soliciting a bribe. Potential penalties include criminal prosecution/imprisonment, dismissal, as well as significant financial penalties. 2. Bribery and/or corruption are defined by law as forms of crime that clearly apply to the security sector, but two or more of the following mechanisms are not available for: Offering, giving, receiving or soliciting a bribe. The law stipulates these penalties, but the maximum penalty is less than a year in prison or small fines that do not serve as a deterrent. 1- Bribery and corruption are not defined by law as crimes that apply to the security sector, but there are broader legal mechanisms in place to address these matters (e.g., local laws supported by policies, regulations, or other laws). 0 - There is no definition of crimes; there is no evidence that other formal mechanisms exist, or that the law is not applied to the security sector.
66	There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals	4. There is legislation on whistleblowing and corruption policy that applies to security and government employees. There is a clear reference to whistleblower protection, including: Protection against disclosure of identity, protection against retaliation, elimination of the burden of proof in relation to retaliation, waiver of liability for the whistleblower, and the right of the whistleblower to refuse to participate in any wrongdoing. 3- There is legislation on whistleblowing and corruption policy that applies to security and government employees. There is a clear reference to whistleblower protection, but only some of the protections listed in Outcome 4 are in the law. 2) There is legislation on whistleblowing and corruption policy, but it may not be strictly applied to security and government officials. There is a clear reference to whistleblower protection, but only some of the protections listed in Outcome 4 are in the law. There is legislation on whistleblowing and corruption policy, but it is weak on whistleblower protections. There may be no clear reference to whistleblower protection, or the law provides few of the protections listed in Outcome 4. 0. There is no legislation to facilitate whistleblowing or whistleblower protection that applies to security or public officials.
67	Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers	4. Whistleblowing is actively encouraged through training, information and guidance on corruption reporting processes and whistleblower protection procedures. An independent unit is adequately resourced to deal with these allegations, and whistleblowing policy campaigns involving employees at all levels are spread throughout the organization. Whistleblowing is encouraged through training, information and guidance on whistleblowing processes and whistleblower protection procedures. However, internal campaigns supporting the whistleblowing policy are haphazard and superficial. Even so, an independent unit is adequately resourced to deal with allegations. Whistleblowing is encouraged through training, information and guidance on corruption reporting processes and whistleblower protection procedures. However, internal campaigns supporting the whistleblowing policy are random and superficial, and the unit dealing with allegations is under-resourced or not independent. 1) Whistleblowing is poorly promoted. Although guidance materials are available, training and internal campaigns supporting the whistleblowing policy are haphazard and superficial. The unit dealing with allegations is either poorly resourced or not independent, for example, attached to another department that reports to security sector organizations. 0. The government does not encourage a whistleblowing policy. There are few (if any) guidance or information materials and no training or information campaigns. A unit may have been set up to deal with allegations, but it is not yet operational.

68	A code of professional conduct is applicable	4. A code of conduct exists as a simple, easy and understandable guide for all security personnel, comprehensively clarifying bribery, gifts, hospitality, conflict of interest and post-service activities. It also provides specific guidance on how to initiate a response to these incidents. 3) A code of conduct exists for all security personnel, covering the aspects listed in Outcome 4, although it may not be comprehensive, but provides specific guidance on how to proceed with these events. 2- A code of conduct exists, but the guidance included is inadequate or lacks clarity and precision. 1- A code of conduct exists, but its content is largely unknown. 0. There is no code of conduct for all security personnel.
69	The code of professional conduct is disseminated to security personnel and is publicly available	4. The code of conduct is publicly available and effectively distributed to all security personnel, and guidance on the code of conduct is included in induction training. 3- The code of conduct is effectively distributed to all security personnel, but is not readily available to the public. Guidance on the code of conduct is included in induction training. 2- The code of conduct may not be readily available to all security personnel, but guidance is provided through training. 1- The code of conduct may not be readily available to all security personnel, and guidance is not provided through training. 0 - The code of conduct is not available to the public or security personnel.
70	Security personnel and civil servants receive anti-corruption training	4. Anti-corruption training addresses the relationship between corruption and the following topics: Organizational values and standards, organizational impact, security effectiveness, identifying and reporting corruption, and risk management. 3- Anti-corruption training addresses the relationship between corruption and some but not all of the following topics Organizational Values and Standards, Organizational Influence, Security Effectiveness, Corruption Identification and Reporting, and Risk Management. 2- Anti-corruption training only addresses organizational values and standards, identification and reporting of corruption. 1- Anti-corruption training is superficial in nature and does not address more than values or standards. 0- There is no anti-corruption training.
71	Security personnel refrain from practices of nepotism and favoritism	This indicator is calculated according to the following formula: (Percentage who say that security personnel refrain from practicing <i>wasta</i> x 100) + (Percentage who say no opinion/don't know x 50) + (Percentage who say that security personnel do not refrain from practicing <i>wasta</i> x 0).
72	A policy is in place to announce results of the trials of security personnel	4- There is a formal policy by the security sector to make trial results available to the public. 2- There is an informal policy by the security sector to make trial results available to the public. 0 - The security sector does not have a policy for making trial results available to the public.
73	Results of trials are made publicly available	4) Both the charges and the results of trials are made available to the public. For security trials above a certain rank, the information is of course made public. This information includes the date, location, and details of the charge, as well as information about the hearing 2- Trial results are made available to the public, but little or no information about the charges, hearing, or other key details are made available or access may be blocked. 0 - No trial information is available to the public.

Recruitment and employee behavior		
74	A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies	4) A parliamentary committee or an independent body (e.g. appointed by the president or prime minister) is appointed to monitor the intelligence service's policies, management, and budgets. It operates without undue influence from the executive branch or the security services. Its mandate corresponds to the powers and resources of the agency. 2) A parliamentary committee or independent body (e.g. appointed by the president or prime minister) is appointed to monitor the intelligence service's policies, management, and budgets. It may, at times, be subject to undue influence from the executive branch or security services, or its mandate does not always match the powers and resources of the agency. 0. There is significant, systematic, and unwarranted influence on the oversight of the intelligence service's policies, management, and budgets. Its mission is likely to result in limited powers and resources to carry out oversight.
75	The oversight of Intelligence agencies' activities, management and budget allocations is effective	4. The oversight officers have access to classified information and meet at least once every two months to review budget and expenditures, personnel, and Intelligence Services policies. Although the meetings are held behind closed doors, a summary of the results is published. 3) Oversight function holders have access to classified information and meet at least once every 6 months to review budget and expenditures, personnel, and Intelligence services policies. Although the meetings are held behind closed doors, a summary of the results is published. 2- The oversight function has access to classified information and meets at least once every 6 months to review budget and expenditures, personnel, and Intelligence services policies, and results are rarely published. The oversight function does not have regular access to classified information. The oversight function may meet at most once every 6 months. 0. The oversight function has little impact on intelligence services.
76	Security agencies explain their decisions and the results of their actions to the public	This indicator is calculated according to the following formula: (Percentage who believe that the head of the security apparatus is responsible for any failure in the work of the apparatus he/she heads x 100) + (Percentage who say no opinion/don't know x 50) + (Percentage who don't believe that the head of the security apparatus is responsible for any failure in the work of the apparatus he/she heads x 0).
77	Recruitment in senior positions at the Intelligence service is affected by favoritism	This indicator is calculated according to the following formula: (Percentage of those who believe that the head of the security apparatus should be held responsible for any failure in the work of the apparatus he heads if it occurs x 100) + (Percentage of those who say no opinion/don't know x 50) + (Percentage of those who do not believe that the head of the security apparatus should be held responsible for any failure in the work of the apparatus he heads if it occurs x 0). 4- There is no chance of interference from external parties that may lead to selection bias or undue influence in the selection of candidates. 2- For example, Integrity may cause an issue due to ties to the ruling party. 0. Senior positions in the intelligence services are primarily a gift from the executive branch.
78	An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates	4) A full investigation into the suitability of candidates is carried out through an external party vetting procedure. This includes a security-cleared recruitment committee, which has the right to call witnesses and request information. 2- Investigating the suitability of candidates is speculative, because elements of the vetting process have been compromised or are of low quality. 0- Few or no investigations are conducted into the suitability of individuals or their past behavior.

79	The proportion of discreet expenditures earmarked to Intelligence agencies (General Intelligence and Preventive Security services)	4- One percent or less of expenditures is allocated to non-disclosed items. 3- Allocate three percent or less, but not more than one percent of expenditures, to undisclosed items. 2- Allocate eight percent or less, but not more than three percent of expenditures, to the suppressed items. 1- Allocate a percentage greater than eight percent of expenditures for discreet items. 0- This percentage is not made public, or the published information is not considered reliable.
80	An information classification system is established in consistence with the law with a view to ensuring protection of information	4- The government uses an information classification system under a clear legal framework to ensure that information is adequately protected. 2- The government is currently developing a system for classifying information under a legal framework to ensure that information is adequately protected. 0. There is no legal framework for classifying information to ensure adequate data protection.

Annex (2): Results of Integrity Scale indicators in the security sector in Palestine for the year 2024

No.	Indicator	Source of information	Required information	Score
Political Will				
1	Legislation is enacted, enabling the PLC to exercise oversight of operations of the security establishment	Basic Law of the Palestinian National Authority: Articles 47, 56, 57 and 58. The Rules of Procedure of the Palestinian Legislative Council: Articles (57, 75-80) Palestinian Security Forces Service Law No. (8) of 2005, see Articles (7, 10)	The Amended Basic Law and the Palestinian Internal Regulations give the Palestinian military and security apparatus multiple oversight tools over the Palestinian military and security apparatus, with clear stipulations on the ability of the organization to conduct oversight of the Palestinian military and security apparatus. where there are clear provisions on the ability of the legislative institution to hold the government accountable for its various activities, such as "service in the security services", "service in the security services", and "service in the military". and the subordination of the security forces to the internal security forces, and the two ministers are subject to the confidence and control of the Council. They are subject to oversight by the legislative level, and the agencies are subject to the responsibility of the Council of Ministers, and they are subject to oversight by the political level.	100
2	Effective PLC oversight of security agencies	The Supreme Constitutional Court issued Interpretative Decision No. (10/2018) on December 12, 2018 to dissolve the Palestinian Legislative Council as of today. See: Coalition for Integrity and Accountability (AMAN), Effectiveness of Oversight of Security Services Performance in the West Bank and Gaza Strip, 2018, p. 10.	The Legislative Council was dissolved by a decision of the Supreme Constitutional Court on December 12, 2018, and has been suspended since mid-2007 following the Palestinian division. After the dissolution of the Legislative Council and its various committees, a number of parliamentary groups were formed, including the Parliamentary Group on Security and Local Governance. Its most recent work was the formation of a fact-finding committee on the security incidents in Nablus, especially the killing of the citizen, Mr. Halawa, in August 2016.	0
3	The Legislative Authority is independent and is not prone to interference by any centers of influence in the Executive or security sector	The Supreme Constitutional Court issued Interpretative Decision No. (10/2018) on December 12, 2018 to dissolve the Palestinian Legislative Council (PLC) as of today.	The Legislative Council and its various committees were suspended in 2007 following the Palestinian split, and the council remained hostage to the disputes between Fatah (which controls power in the West Bank) and Hamas (which dominates power in the Gaza Strip). The Legislative Council was dissolved by a decision of the Supreme Constitutional Court on December 12, 2018.	0
4	A parliamentary committee with a special focus on oversight of security agencies is established in accordance with the PLC Standing Orders	PLC Standing Orders (Articles 48 and 57)	Clause (h) of the first paragraph of Article 48 of the Standing Orders provides for the formation of the Interior Committee (Interior and Security), which enjoys broad powers. According to Article 57 of the Rules of Procedure, "Committees may, through their chairmen, request information or clarifications from any minister or official in the institutions of the National Authority regarding the topics before them or those that fall within their competence."	100

5	Official oversight bodies diligently monitor the performance of security agencies in the West Bank.	According to SAACB Law, the Bureau oversees all state institutions. The Anti-Corruption Commission also oversees security agencies and other public institutions.	SAACB issues annual reports that include oversight reports on the security services, but the reports of the Bureau do not include oversight reports on the intelligence services.	50
6	Annual audit reports on security agencies are submitted to the PLC	The Supreme Constitutional Court issued Interpretative Decision No. (10/2018) on December 12, 2018 to dissolve the Palestinian Legislative Council (PLC) as of today.	The Legislative Council was dissolved by a decision of the Supreme Constitutional Court on December 12, 2018, and has been suspended since mid-2007 following the Palestinian division.	0
7	The PLC holds the Ministry of Interior and National Security to account for findings of the reports produced by the SAACB	The Supreme Constitutional Court issued Interpretative Decision No. (10/2018) on December 12, 2018 to dissolve the Palestinian Legislative Council (PLC) as of today.	The Legislative Council was dissolved by a decision of the Supreme Constitutional Court on December 12, 2018, and has been suspended since mid-2007 following the Palestinian division.	0
8	The security policy or security strategy is deliberated by the PLC	The Supreme Constitutional Court issued Interpretative Decision No. (10/2018) on December 12, 2018 to dissolve the Palestinian Legislative Council (PLC) as of today.	The Legislative Council was dissolved by a decision of the Supreme Constitutional Court on December 12, 2018, and has been suspended since mid-2007 following the Palestinian division.	0
9	PLC deliberations address security threats to the country, procurement decisions, level of spending on the security sector, number of security personnel, size of the security budget, and use of operational capacities of the security sector	The Supreme Constitutional Court issued Interpretative Decision No. (10/2018) on December 12, 2018 to dissolve the Palestinian Legislative Council (PLC) as of today.	The Legislative Council was dissolved by a decision of the Supreme Constitutional Court on December 12, 2018, and has been suspended since mid-2007 following the Palestinian division.	0
10	Regular consultations on the security sector policy and security strategy take place with the public		The public opinion poll could not be conducted due to the occupation's genocidal war in the Gaza Strip, so the indicator was suspended.	suspended
11	Right of access to updated documents and information on the security sector policy or security strategy is safeguarded	1) See Council of Ministers website - Sectoral Strategy for Security: https://t.ly/3w8m 2) See the Ministry of Interior's Strategic Plan for the Security Force (2017-2022): https://www.moi.pna.ps/home/	The plans published on the websites of the Council of Ministers and the Ministry of Interior are old plans. The Security Sector Plan 2021-2023 was published on the website of the Council of Ministers, and the Strategic Plan for the Security Forces (2017-2022) was published on the website of the Ministry of Interior, but it was not presented for discussion before it was approved by the government to allow for public discussion and scrutiny.	0

12	There are indications that security institutions are open to civil society organizations	1. The Coalition for Integrity and Accountability (AMAN), Fourteenth Annual Report "The Reality of Integrity and Anti-Corruption 2022", p. 16, 2023.	The annual report indicates that the Executive Branch continues to make decisions and plans for reform in a wide range of areas, without a comprehensive review of the organization's priorities or a comprehensive analysis of its performance. Without a discussion that helps prioritize the reform process, or contributes to the formulation of policy, there is no will to commit to the reform process, and there is no will to commit to it.	50
13	Civil society organizations and research centers discuss the issues of integrity, transparency and corruption within the security sector	Integrity, transparency and corruption in the security sector have been widely discussed by civil society organizations.	During the study period, civil society organizations issued dozens of reports and research papers on the issues of integrity, transparency and corruption in the security sector, and the security establishment participated in most of the meetings held at the invitation of civil society organizations.	100
14	The State implements an explicit anti-corruption policy, which is effectively applicable to the security sector	1. National Cross-Sectoral Strategy to Promote Integrity and Combat Corruption 2025-2030: https://www.pacc.ps/library/viewbook/40436 2. National Cross-Sectoral Strategy to Promote Integrity and Combat Corruption 2020-2022: https://www.pacc.ps/library/viewbook/10347	The strategic plan covers all sectors, including the security sector, and work is done through awareness and training programs, courses, measures, and risk assessments (risk assessments have been completed for the Supply and Equipment Authority, in addition to two security institutions). However, according to the strategic plan, there are still some obstacles, most notably the incompleteness of the Palestinian legislative system.	50
15	The anti-corruption policy is reflected in the security sector's plan of action. Implementation makes progress in line with the set timeframe	See Council of Ministers website - Sectoral Strategy for Security: https://t.ly/3w8m	The Security Sector Plan mentions the governance of the security establishment as one of the required interventions to combat corruption, with the aim of enhancing accountability and transparency. However, this is not linked to a specific timeline.	50
16	Needed financial and human resources are made available at compliance departments and units	1. Interview with Brigadier General Ahmed Nazzal, Director of the Training and Planning Department at the General Intelligence on 11/9/2024. 2. Interview with Dr. Mahmoud Sanallah, Director of the Complaints Unit, on 9/19/2024. 3. Interview with Colonel Mamoun Ziada, Director of the Security Strategic Planning Unit at the Ministry of Interior, on 9/9/2024.	In each of the Palestinian security agencies, there is a compliance department. The name varies from one agency to another. In the police, it is called the Inspector General of Police, in the intelligence agency the General Superintendent, in the Preventive Security Agency the General Directorate of Control, in the National Security Agency the Control and Inspection Department, in addition to the agency's security departments, which also perform oversight functions. These departments are responsible for examining the performance of employees and their compliance with the law. However, these departments suffer from a lack of staff, a lack of expertise in the field of oversight work, and a lack of resources in some of them.	50

17	C o m p l i a n c e departments and units are independent	1. Interview with Colonel Mamoun Ziada, Director of the Security Strategic Planning Unit at the Ministry of Interior, 9/9/2024.	Compliance-related departments and units are within the chain of command of the security sector organizations they oversee, are within the established administrative structure of these agencies, and are difficult to disband. However, they do not report directly to a senior member of the security sector (e.g. the Commander-in-Chief/Minister of Interior). In the new amendment to the Security Forces Service Law, the position of Inspector General was abolished.	50
18	Compliance units within the security sector are effective	1. Interview with Colonel Mamoun Ziada, Director of the Security Strategic Planning Unit at the Ministry of Interior, 9/9/2024.	Employees within units are aware of the risks of corruption to their organizations and are able to deal with some risks independently. But they cannot ensure that other departments or units are able to adequately address the risks. Agency leadership is highly responsive to the recommendations of oversight units in accordance with the law.	75
19	The public are confident that security officials are seriously willing to combat corruption		The public opinion poll could not be conducted due to the occupation's genocidal war in the Gaza Strip, so the indicator was suspended.	suspended
20	Challenges that furnish an opportunity for corruption in the security sector are reviewed	See Council of Ministers website - Sectoral Strategy for Security: https://t.ly/3w8m	The published plan for the security sector does not cover the year 2024.	50
21	Assessments of risks of corruption are provided on a regular basis	1. National Cross-Sectoral Strategy to Promote Integrity and Combat Corruption 2020-2022: https://www.pacc.ps/library/viewbook/10347 2. National Cross-Sectoral Strategy to Promote Integrity and Combat Corruption 2025-2030: https://www.pacc.ps/library/viewbook/40436	The Anti-Corruption Commission has a guideline for assessing corruption risks and conducts exercises covering all sectors, including the security sector.	50
22	New policies and plans are informed by findings of the integrity assessment	1. Interview with Colonel Mamoun Ziada, Director of the Security Strategic Planning Unit at the Ministry of Interior, 9/9/2024.	A set of studies and training programs are being prepared with the Anti-Corruption Commission and civil society on assessing corruption risks in a number of security agencies.	100

Security Sector Budget				
23	A clearly defined process of the budget planning cycle is in place. Budget planning departments are established and independent	Law No. 7 of 1998 on the organization of the public budget and financial affairs	The budget of the security services is subject to the same procedures in terms of budget preparation in the Palestinian Authority's institutions, and the Financial Department of the Palestinian Authority centralizes the budget. The financial department is responsible for the annual budget of the security establishment, where the financial department addresses the various security agencies and departments to provide them with various data, projects, and needs. After compiling data from the agencies, the general budget is prepared and submitted to the Ministry of Finance. The Ministry of Finance discusses and sometimes revises them with the Finance Department.	100
24	The security sector budget includes comprehensive and detailed information on expenditures according to respective functions	The budget was published by end of September 2024.	Although the budget has been published, it does not include all the information about expenditures.	50
25	The PLC receives an accurate security sector budget proposal in accordance with the 199V Law on the Regulation of the Public Budget and Financial Affairs	The Supreme Constitutional Court issued Interpretative Decision No. (10/2018) on December 12, 2018 to dissolve the Palestinian Legislative Council (PLC) as of today.	The Legislative Council was dissolved by a decision of the Supreme Constitutional Court on December 12, 2018, and has been suspended since mid-2007 following the Palestinian division.	0
26	The PLC Interior and Security Committee is vested with the powers to intervene in budget allocations and review expenditures	The Supreme Constitutional Court issued Interpretative Decision No. (10/2018) on December 12, 2018 to dissolve the Palestinian Legislative Council (PLC) as of today.	The Legislative Council was dissolved by a decision of the Supreme Constitutional Court on December 12, 2018, and has been suspended since mid-2007 following the Palestinian division.	0
27	The security sector budget is publicly available, disaggregated and clearly defined before it is enacted	The detailed budget law was not published until mid-September 2024.		0
28	The greatest portion of the enacted security sector budget is fully disclosed to the media and civil society actors	The detailed budget law was not published until mid-September 2024.		0
29	Information requested by citizens, media outlets, and civil society on the security sector budget is provided in a timely fashion	Expert opinion	Civil society organizations and media outlets face difficulty in obtaining information related to the security sector budget and the media in the absence of a right to information law, in addition to the Ministry of Finance's lack of commitment to publish the detailed budget law.	50

30	An internal audit (financial) unit is established, effective, experienced and independent in the performance of its functions	Interview with Colonel Mamoun Ziada, Director of the Security Strategic Planning Unit at the Ministry of Interior, 9/9/2024. Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024.	Financial control over the security establishment is carried out through a set of procedures to audit the various expenditure items and ensure the proper and safe use of public funds for the purposes for which they are intended. In recent years, the Financial Procedures and Audit Manual for the Security Sector has been developed by the Palestinian Ministry of Interior. The audit is carried out in three stages: the first within the security institution, the second by the military financial department, and the third by the Ministry of Finance.	75
31	The SAACB regularly audits the security sector spending and evaluates the security sector performance	Financial and Administrative Control Bureau, Annual Report 2023 : www.saacb.ps/BruRpts/SAACB2024RPT.pdf	The Financial and Administrative Control Bureau periodically audits the state's final account. It also audits a number of security agencies and bodies every year, but not on a regular basis. In 2023, it published oversight reports on the General Directorate of Police, the Military Training Authority, and the Central Financial Administration (Military).	50
32	Findings of the SAACB audit reports on security agencies are published	Interview with Mr. Omar Yassin, Director General of the General Directorate for Governance Control and Security, 5/10/2024. Financial and Administrative Control Bureau, Annual Report 2023 : www.saacb.ps/BruRpts/SAACB2024RPT.pdf	An annual plan is drawn up for oversight, and it is approved, and the oversight and audit process is conducted on the entities that were approved in the plan, and then notes are sent to these entities, all or most of these entities respond within the specified date, and after receiving the response, the Bureau studies the responses, documents and reinforcements related to the report, and the report is amended based on what was submitted, and the report is submitted to the competent authorities, and the oversight report on any security organization is published as part of the annual report. The Audit Bureau follows the policy of publishing summaries of oversight reports on institutions, whether civil or security.	50
33	S A A C B recommendations are capitalized on	Interview with Mr. Omar Yassin, Director General of the General Directorate for Governance Control and Security, 5/10/2024.	The CAA reports on the extent to which the various entities are committed to implementing the recommendations, and the CAA follows up on the reasons that prevent the implementation of some recommendations. Returning to the reports on the implementation of oversight recommendations issued by the Financial and Administrative Control Bureau during the last two years, there is a significant increase in the implementation of recommendations, reaching more than 90% in some organizations. This is confirmed by Mr. Omar Yassin that some recommendations are not implemented or partially implemented, due to reasons that are beyond the capabilities of the institution.	100

Procurement and bidding				
34	Legislation is in place, covering all procurements of the security sector without exception	1. See: Public Procurement Law No. 8 of 2014: http://muqtafi.birzeit.edu/pg/getleg.asp?id=16583 2. See: Coalition for Integrity and Accountability (AMAN), Environment of Integrity, Transparency and Accountability in the work of the Central Military Financial Management Organization, 2017, p. 6.	Decree Law on Public Procurement No. 8 of 2014 defined the legal framework for all public procurement operations and established a set of controls that ensure the achievement of the law's objectives in procuring supplies, works and services at the best prices, which contributes to rationalizing expenditures while maintaining quality assurance and promoting the principle of fair competition. However, according to Article 3, the law excluded supplies, services and works of a high security nature, provided that these purchases are determined by a decision of the Council of Ministers. The security establishment and the financial administration operate under the Exceptional Financial Regulation, an unpublished regulation that constitutes an essential building block in the legal system under which the military financial administration and institutions related to the security establishment operate, even though it was not duly approved and was issued by the central financial administration by a decision of former Prime Minister Dr. Salam Fayyad in 2010, and renewed annually by a decision of the Minister of Finance.	50
35	Regulations on procurement bodies stipulate a full understanding of the cases of corruption	1. See: Public Procurement Law No. 8 of 2014: http://muqtafi.birzeit.edu/pg/getleg.asp?id=16583	Article 63 of the Public Procurement Law stipulates that "The competent official and other employees of the Public Supplies Department, the Central Tenders Department and public sector employees who are involved in the preparation, planning and implementation of public procurement procedures, and in the administration of procurement contracts, shall comply with the following: A. Perform their duties with complete impartiality to ensure fair competitive participation of all bidders in public procurement processes. b. Work in accordance with the public interest and in accordance with the objectives and procedures specified in the law and the regulations issued thereunder. c. Avoid conflicts of interest in the performance of his duties and in his private conduct. 2. The competent official and all other employees of the Public Supplies Department, the Central Tenders Department and all public sector employees, who are involved in the preparation, planning and implementation of public procurement procedures, and in the administration of procurement contracts, are prohibited from a. Exploit any information obtained by virtue of their position, or exploit it to achieve material or moral gains for his own benefit or for the benefit of others, directly or indirectly. B. Disclosing any information or data obtained as a result of their work may affect the integrity of the procurement process. c. Engage in auditing, legal or administrative consultancy for any person bidding for the tender.	100

36	Regulations on security sector procurements are enforced effectively	Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024.	Regulations related to procurement in the security sector are strictly enforced and must be followed for all procurement in the security sector without exception.	100
37	A procedure manual on public procurements and tenders is in place	Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024. Interview with Brigadier General Suleiman Saadeh and Brigadier General Aref Abu Atwan, 3/9/2024. See also: General Supplies Directorate Procedures Manual issued in 2012.	The Supply Directorate's Business Procedures Manual formalizes the process of the security sector procurement cycle from needs assessment, through contract execution and finalization, to asset disposal. It also details policies and procedures for each stage of the procurement cycle process, but there are some shortcomings in terms of implementation. A written procedures manual has been adopted and approved for the procurement of purchases and services for the security organization, but it is not published.	75
38	The oversight body for security sector procurements is independent	Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024.	Procurement oversight is carried out by the Military Financial Administration, in addition to the Military Financial Control in the Ministry of Finance, which are technical, non-political organizations whose activities are consistent regardless of changes in government, and are not subject to undue influence on their performance.	100
39	Oversight of security sector procurements is efficient	Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024.	The law is adhered to in terms of forming the various committees, and then developing the tender booklet and discussing it with the general supplies, and everything that is purchased is done through committees, and the procurement processes are subject to internal and external control. There are also receiving committees in which specifications and metrology are involved to match the specifications of the purchases.	100
40	Details of all procurements are available	See: Supreme Council for Public Procurement/ Unified Portal: Mai page (shiraa.gov.ps) See: Tenders and bids archive on the General Supplies Department website https://gs.pmof.ps/index.php	Tenders and solicitations for security equipment are announced on the Supreme Council for Public Procurement/Unified Portal under the procuring entity (Supply and Equipment Authority). The Public Supplies Directorate at the Ministry of Finance also announces tenders for the security sector, and the tender is disclosed and the contract is awarded. For the contract, there is a description of the item purchased, the winning bidder, the beneficial owners, the price paid, full life-cycle costs, service cost, parts costs, and delivery/termination date. Not all details of procurements made by agencies and organizations operating in the security sector are available.	50

41	Data on procurements are published, usually in an accessible format	See: Public Procurement Council / Unified Portal: List of procurement processes (shiraa.gov.ps) Archive of tenders and bids on the website of the Department of Public Supplies: https://gs.pmf.gov.ps/index.php	The Public Procurement Council's website/unified portal, as well as the Public Supplies Directorate, provides data on tenders and tenders conducted, but this data is not readily available for comparison purposes.	50
42	The vast majority (90+ percent) of security sector procurements are carried out through a system of open competition, with the exception of some clearly specified and restricted cases	1. Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024. 2. Interview with Brigadier General Suleiman Saadeh and Brigadier General Aref Abu Atwan, 3/9/2024. 3. See/me: General Supplies Directorate page https://gs.pmf.gov.ps/index.php?p=apply	The security agencies and central departments and bodies determine their needs for various services and procurement, and are supplied either by direct procurement, or by soliciting quotations or tenders, in accordance with the Procurement Law, the Financial Regulations, and the Extraordinary Financial Regulations for Security Agencies. Procurement and services are advertised in newspapers through the Supply and Equipment Authority, or through the Supplies Department or centralized tenders at the Ministry of Finance (MoF). The vast majority of procurement is done through open competition via centralized tenders. However, it is not known exactly how much is spent between solicitation and direct procurement compared to competitive procurement.	75
43	Justifications are provided for all contracts awarded through individual procurement and restricted competition (invitation to bids). These are also subject to external audits	1. See: Public Procurement Law No. 8 of 2014: http://muqtafi.birzeit.edu/pg/getleg.asp?id=16583 2. See: Coalition for Integrity and Accountability (AMAN), Security Sector Budget the Palestinian Security Sector Budget for 2019 and the Basis for Petty Cash Items in Operating Expenses, 2020, p.6	In addition to the conditions stipulated in the Public Procurement Law of 2014, the exceptional financial regulation defined the authority for direct procurement for the security establishment by allowing the purchase of operational goods included in centralized tenders, and capital purchases by direct procurement, by soliciting bids for an amount not exceeding \$5,000, and launching a formal tender if it exceeds that amount, and the regulation granted the head of the administration or commander of the agency the authority to directly purchase operational expenses for an amount not exceeding NIS 4,000. However, external oversight is limited.	75
44	Officials in charge of designing tender specifications or those involved in the decision-making process of tender boards are subject to bylaws or codes of professional conduct, which are specifically prepared to avoid conflicts of interest	1. See: Public Procurement Law No. 8 of 2014 http://muqtafi.birzeit.edu/pg/getleg.asp?id=16583 2. Public Procurement Law No. (5) of 2014: http://www.shiraa.gov.ps/Portals/0/Images/system.pdf?ver=2019-07-12-194841-057	Article 63 of the Public Procurement Law stipulates that "The competent official and other employees of the Public Supplies Department, the Central Tenders Department and public sector employees who participate in the preparation, planning and implementation of public procurement procedures and in the administration of procurement contracts shall comply with the following: A. Perform their duties with complete impartiality to ensure fair competitive participation of all bidders in public procurement processes.	100

			b. Work in accordance with the public interest and in accordance with the objectives and procedures specified in the law and the regulations issued thereunder. c. Avoid conflicts of interest in the performance of his duties and in his private conduct. 2. The competent official and all other employees of the Public Supplies Department, the Central Tenders Department and all public sector employees, who are involved in the preparation, planning and implementation of public procurement procedures, and in the administration of procurement contracts, are prohibited from a. Exploit any information obtained by virtue of their position, or exploit it to achieve material or moral gains for his own benefit or for the benefit of others, directly or indirectly. B. Disclosing any information or data obtained as a result of carrying out their work, which may affect the integrity of the procurement process. c. Work in auditing, legal or administrative consultancy for any person applying for the tender." According to the provisions of Article 196 of the Public Procurement Law No. (5) of 2014, the activities of employees related to the procurement process that they carry out in the interest of the procuring entity, which are subject to the restrictions on conflict of interest, include 1. procurement planning including the preparation, review and approval of specifications and statement of work for a particular procurement. 2. Assessing the needs to be met by the procurement. 3. Preparation of procurement documents including solicitation of participation in the procurement process. 4. Evaluate the qualifications of bidders, evaluate and compare bids, proposals and sealed quotations, including membership in bid committees and evaluation committees. 5. Conducting technical discussions or negotiations. 6. Selecting or approving the successful tenderer. 7. Administering the procurement contract, including approving amendments to the procurement contract, cash payments, and settling claims and disputes.	
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45	A comprehensive audit process allows officials to take part in scrutinizing suppliers and designing tender specifications	1. Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024. 2. Interview with Brigadier General Suleiman Saadeh and Brigadier General Aref Abu Atwan, 3/9/2024.	An administrative, financial and technical evaluation committee determines the specifications of the tender and suppliers. The Department of Follow-up of Committees and Technical Support in the General Supplies Directorate, a technical body in the Ministry of Finance, also performs this task. There is also a committee in the Supply and Equipment Authority, and a member of the Standards and Metrology Organization participates in this committee to receive and inspect the tender, and prepare a report on the tender, and if there are any irregularities, the report is sent to the Public Tenders Committee.	100
46	Official policies and procedures are in place, identifying how supplier service and/or delivery obligations are controlled, assessed and reported	1. Public Procurement Law No. (5) of 2014: http://www.shiraa.gov.ps/Portals/0/Images/system.pdf?ver=2019-07-12-194841-057	Article 165 of the Public Procurement Law states: "1. The procuring entity shall inspect and receive supplies, works, consultancy services or other services to ensure that they conform to the technical conditions and specifications contained in the contract documents, through an initial and final inspection and receiving committee, whose members shall not be less than three in number, whose composition shall be issued by a decision of the competent official, provided that they are specialists from the procuring entity itself or from any other entity in accordance with the nature of the contract. 2. Anyone who participated in the preparation of specifications and tender documents, analysis and evaluation procedures, or supervision may not be a member of the Inspection and Receiving Committee, although they may be used with the approval of the competent official of the procuring entity. 3. The inspection and receipt of supplies, works, consultancy services or other services may be entrusted to a specialized person or team, subject to the approval of the competent official and following the procedures specified in the Law and the Regulations when contracting with them. 4. The inspection and receipt processes shall be carried out in accordance with the stages and conditions stipulated in the contract. 5. The contract shall specify the party that bears the costs of conducting the examinations mentioned in paragraph (4) above. 6. Notwithstanding the above, and if so stated in the terms of the contract, the procuring entity shall have the right, during specific time periods and stages of production or execution, to carry out the necessary examinations by itself, or whoever it assigns to perform this task, to ensure that the stages of execution, products or works conform to the quality standards and specifications contained in the terms of the contract. This does not in any way relieve the Contractor of its contractual obligations or limit the powers and responsibilities of the inspection and receiving committees referred to in paragraph (1) or paragraph (3) above when the procuring entity carries out such examinations.	100

47	All contracts, including modifications after tenders are awarded, are publicly accessible	See: General Supplies Directorate website: http://www.gs.pmf.ps	The Public Supplies Directorate publishes all public contracts, including post-award amendments. However, contract solicitations and direct procurements are not made public.	50
48	Officials regularly produce audit compliance reports on contracts and achievements	Experts' opinion	No reports are generated.	0
49	Adequate actions are taken against all contract violations	1. See: General Supplies Directorate website: http://gs.pmf.ps/index.php?p=annonc&ty=2 The website of the Supreme Council for Public Procurement Policies: https://www.shiraa.gov.ps/DisputeUnit/BlackList	The blacklist stipulated in the Public Procurement Law for violating companies is published on the Public Supplies Directorate's website. Eight companies were banned from participating in government tenders for between two and three years, and some were fined. It is also published on the website of the Supreme Council for Public Procurement Policies/Unified Portal.	100
50	Official mechanisms allow companies to file challenges or complaints against anomalous practices in the procurement process	See: Chapter 6 of the Public Procurement Law No. 8 of 2014: http://muqtafi.birzeit.edu/pg/getleg.asp?id=16583	The Public Procurement Law allows supplier companies to submit complaints to procuring entities, the Public Supplies Directorate, and the Tender Committee (Article 56). The law also requires the Supreme Procurement Council to form a dispute review unit. The unit is made up of various review committees consisting of experts specialized in the relevant fields and as specified by law (Article 57). The law also allows for court challenges to the decisions of administrative bodies involved in tenders: "All decisions issued by the Council, the procuring entity, the Public Supplies Department, the Central Tenders Department and the Dispute Review Unit shall be subject to judicial challenge in accordance with the provisions of the law" (Article 58).	100
51	Mechanisms for filing challenges and complaints by companies are effective and systematically used	1. Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024. 2. Interview with Brigadier General Suleiman Saadeh and Brigadier General Aref Abu Atwan, 3/9/2024. There is a special section in the Public Procurement Manual issued by the Supreme Council for Public Procurement Policies that addresses complaints of all types and stages, which was released in February 2022. https://www.shiraa.gov.ps/Portals/0/Manuals/%D8%AF%D9%84%D9%8A%D9%84%20%D8%A7%D9%84%D8%A7%D8%AC%D8%B1%D8%A7%D8%A1%D8%A7%D8%A1.pdf?ver=tef11BB72ZLFuyYVJSFtUQ%3d%3d	In case of complaints, companies submit complaints to the Ministry of Interior and the competent authorities who investigate the complaints.	100

52	Companies believe they will not face discrimination in future procurement operations if they file complaints		The public opinion poll could not be conducted due to the occupation's genocidal war in the Gaza Strip, so the indicator was suspended.	suspended
53	Legally prescribed penalties are clear, providing for punishing any suppliers who commit acts of corruption	See: Public Procurement Law No. 8 of 2014 http://muqtafi.birzeit.edu/pg/getleg.asp?id=16583	Article 73 stipulates that whoever is involved in violating this law, including the forms of corruption contained therein, shall be punished as follows: "1. Without prejudice to any harsher penalty provided for in other applicable laws, anyone who violates the provisions of this Decree-Law shall be punished as follows A. Whoever is proven to have violated the provisions of Article (63) of this Decree-Law shall be immediately dismissed from his job and deprived of all his employment rights. b. Any tenderer to whom paragraph (5/a) of Article (32) applies or who is proven to violate the provisions of Article (64) of this Decree-Law shall be prohibited from participating in procurement operations, according to the procedures specified in the Law, for the period specified by the Council, provided that 1) Notify him in writing and explain the reasons for the decision. 2) Giving him a period of ten days to object to the notification. 2. If the bidder is a company, the provisions of the previous paragraph of this Article shall apply to all members of the company's board of directors. 3. The contract signed with the supplier, contractor or consultant shall be canceled by a decision of the procuring entity and the insurance value shall be confiscated, while preserving its right to claim compensation in any of the following cases a. If he uses fraud or manipulation in his dealings with the procuring entity. b. If it is proven that he himself or through others, directly or indirectly, attempted to bribe an employee of the authorities subject to the provisions of the law. C. If he becomes bankrupt or insolvent and is unable to execute the tender. D. If he fails to fulfill his obligations or violates the terms and conditions specified in the law or contract.	100
54	Cases of corruption in procurements are investigated and offenders are put on trial without any undue political influence	See: General Supplies Directorate website: http://www.gs.pmf.ps/index.php?p=annonc&ty=f See also the Public Procurement Policy Council page: https://www.shiraa.gov.ps/DisputeUnit/BlackList See also: http://gs.pmf.ps/Black_list.pdf	The Supreme Council for Public Procurement Policies (SCPP) and the Public Supplies Directorate (PSD) did not clarify the reason for the exclusion of some companies and placing them on the blacklist published on the directorate's website, whether for reasons related to corruption, technical violations of stipulated obligations, or failure to respect the deadlines for contract implementation, indicating that there is no political influence on the investigation of cases and punishment of perpetrators.	50

Recruitment and employee behavior				
55	Promotions and privileges in security agencies are subject to laws and regulations	According to the Law on Service in the Security Forces and the laws of the security services in the Financial Regulations for Ministries and Public Institutions of 2009 in Article (69) regarding other security-related expenses and the exceptional financial regulation.	The exceptional financial regulation has not been published.	50
56	The security sector allows public access to information on the number of civil servants and security personnel	Budget Law 2023	The Ministry of Finance provides summary information on the number of civilian and security personnel. The number of employees (all ranks, from soldier to general) in the central financial administration amounted to 66,179, of which 10,097 were on the PLO cadre.	100
57	The security sector has faced the problem of ghost employees over the past five years	1. Interview with Brigadier General Osama Abu Sultan, Director of the Control Department at the Military Financial Administration, on 2/9/2024.	The security sector has not faced the issue of ghost soldiers for the past five years. However, there are cases in the security establishment that are discharged outside the security establishment, i.e., not on duty	75
58	The size of the wage bill of civil servants and security personnel is made publicly available	The 2023 Budget has been reviewed.	The size of salaries for civilian and security state employees is set in the 2023 budget law.	100
59	Allowances paid to civil servants and security personnel are published and accessed by the public	The 2023 budget has been reviewed. The Coalition for Integrity and Accountability (AMAN), Palestinian Security Sector Budget for 2019 and the Basis for Petty Cash Items in Operating Expenses, 2020.	The amount of allowances such as supervision, management, risk-taking, etc. that civilian and security personnel receive under the civil and security service laws are published and included in salaries, but not the amount of petty cash and gasoline coupons distributed to security force officers. However, the amount of petty cash and gasoline coupons distributed to security force officers is not published.	50
60	Staff receive their salaries on time	Expert opinion.	Normally, employees receive their salaries on a regular basis. But for more than two years, the PA has been suffering from a financial crisis that makes it unable to commit to paying employees' salaries on time.	100
61	The payment system is well-prepared, regular and public	Expert opinion.	Employees used to receive their salaries correctly according to the laws in force in the country. However, for more than two years, the PA has been suffering from a financial crisis that makes it unable to pay all salaries; instead, employees receive 50-85% of their salaries.	100

62	Salaries and increments are publicly accessible	Security Forces Service Law No. 8 of 2005.	Annex One of the Security Forces Service Law refers to the salary scale for security officers and the length of time in rank, in addition to a number of regulations and decisions issued by the Council of Ministers, such as Cabinet Decision No. 17 of 2010 on the executive regulation on allowances and expenses for official work missions and external courses for the Palestinian Security Forces, Cabinet Decision No. (01/65/12/MW/SF) of 2008 on escort allowances, and Cabinet Decision No. (1) of 2017 on allowances for military attachés when going abroad on scholarships.	100
63	The system of recruiting security personnel at mid- and upper-management levels includes objective standards of relevant positions as well as evaluations based on specific criteria	1. Interview with Brigadier General Ahmed Nazzal, Director of the Training and Planning Department at the General Intelligence on 11/9/2024. 2. Interview with Dr. Mahmoud Sanallah, Director of the Complaints Unit, on 9/19/2024. 3. Interview with Colonel Mamoun Ziada, Director of the Security Strategic Planning Unit at the Ministry of Interior, 9/9/2024. 4. Interview with Major Rakan Ayedi of the Military Training Authority on September 5, 2024.	Most officer appointments come from graduates of Istiqlal University and foreign missions to military and police colleges. There is also a program of leadership courses at three levels (foundation, intermediate and senior officers), and passing the senior officers' course is a basis for promotion and obtaining leadership positions within the security services. Each security agency has a committee that oversees promotions and transfers, headed by the commander of the agency, and is evaluated according to specific criteria such as courses, scientific qualifications and other requirements, and there are job description cards for most leadership positions in most security agencies and bodies.	75
64	In their statements or media interviews, security sector institutions are publicly committed to anti-corruption and integrity measures	Interview with Mr. Jihad Harb, Director of Thabat Center for Research and Opinion Polls, 5/10/2024.	Integrity, anti-corruption and the promotion of good governance are included in the documents of the security establishment, including the sectoral strategy for security, which is a clear development. The Ministry of Interior has formed an Integrity and Transparency Building Team in the Palestinian Security Establishment consisting of the Palestinian Security Services, the Anti-Corruption Commission, and the Administrative and Financial Control Bureau. The Palestinian Security Establishment is publicly committed to anti-corruption measures, and in the event of a specific case, appropriate measures are taken.	100
65	The law prescribes specific penalties for corruption offences	Anti-Corruption Commission Law No. (1) of 2005: http://www.pacc.pna.ps/ar/cp/print.php/2010/08/23/1-2005-2-2.phtml?p=main	Article 22 of the same law states: "Penalties, unless otherwise stipulated in the Penal Code or any other applicable law, whoever is convicted of one of the offenses specified in this law shall be punished with a penalty of three to fifteen years, a fine up to the value of the money involved in the crime, or one of these two penalties, and the restitution of the money obtained from the crime." The penalties in the anti-corruption law are deterrent.	100

66	There are regulations on whistle blowing and adequate protection is provided to whistleblowers from the security sector against any reprisals	See also Legislative Decree No. (37) of 2018 amending the Anti-Corruption Law No. (1) of 2005, as amended. See: Law on the Protection of Whistleblowers, Witnesses, Informants and Experts in Corruption Cases and their relatives and persons closely related to them: https://maqam.najah.edu/legislation/419/	The text of Article 18 of the original law is amended to read as follows: The text of Article 18 of the original law is amended to read as follows: 1. Anyone who possesses serious information or documents regarding a crime of corruption committed by one of those subject to the provisions of this Decree Law shall submit them to the Authority, or submit a written complaint against the perpetrator. 2. . The Authority shall provide the necessary legal, functional and personal protection for whistleblowers, witnesses, informants, experts, their relatives, and persons closely related to them, in corruption cases, from any potential aggression, retaliation or intimidation through the following A. Providing them with protection in their places of residence. b. Not disclosing information about their identity and whereabouts. c. Provide their statements and testimonies through the use of modern communication technologies, in a manner that ensures their safety. d. Protect them in their workplaces, and immunize them from any discrimination, mistreatment, or any arbitrary measure or administrative decision that changes their legal or administrative status, or diminishes their rights because of their testimonies, reporting, or the work they have done to uncover corruption crimes. e. Provide them with places to shelter them when necessary, and take any action or perform any necessary action to ensure their safety. 3. Requests for protection from the Authority shall be decided according to the circumstances surrounding the applicants for protection, provided that the protection shall be lifted as soon as the circumstances that led to its imposition no longer exist. 4. All matters related to providing the required protection to whistleblowers, witnesses, experts, their relatives, and persons closely related to them shall be regulated by a regulation issued for this purpose by the Council of Ministers, based on the recommendation of the Chairman of the Authority. 5. Notwithstanding the provisions of any other legislation, the Authority shall disburse financial assistance to whistleblowers and witnesses in accordance with a regulation issued by the Council of Ministers. 6. The protection granted by the Authority's decision shall be forfeited if the conditions for granting it are violated.	100
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67	Whistleblowing is encouraged through training, provision of information and guidance on whistleblowing, and procedures for the protection of whistleblowers	1. Interview with Colonel Mamoun Ziada, Director of the Security Strategic Planning Unit at the Ministry of Interior, 9/9/2024. 2. Interview with Major Rakan Ayedi of the Military Training Authority on September 5, 2024.	The issue of reporting and encouraging corruption is addressed during code of conduct trainings, but such training is still limited in the security establishment. The Palestinian Integrity and Transparency Training Curriculum for the Palestinian Security Establishment, which addresses this topic, has been approved. Cooperation with the Anti-Corruption Commission, especially since the security sector is a partner in the Anti-Corruption Strategic Plan, in conducting trainings and clarifying the provisions of the Anti-Corruption Law. Complaints are dealt with and studied if there is a suspicion of corruption in order to deal with it with the competent authorities. In 2019, a system to protect whistleblowers, witnesses, informants, and experts in corruption cases was approved.	75
68	A code of professional conduct is applicable	1. See the website of the Ministry of Interior: https://drive.google.com/file/d/1u2igS_XHcZZkisuFHSkJJe8VZb_b_b_t_W_v_Q_R/view?usp=sharing 2. Decision of the Head of Intelligence dated 1/4/2010. 3. Website of the National Security Forces: http://www.nsf.ps/pnf/ar/79/3	There is a Code of Ethics and General Code of Conduct for members of the Palestinian Security Forces issued on: 2/26/2018. Individual codes were also issued for different security services, such as: 1) The head of the General Intelligence Service issued a code of conduct for officers and members of the General Intelligence Service in 2010. 2) In 2013, the Preventive Security Agency, in cooperation with the Office of the High Commissioner for Human Rights, issued a code of conduct for Preventive Security personnel. 3) The Police Authority approved a code of conduct, but it was not published until the end of 2016. 4) The National Security issued a code of conduct in 2013 for officers and members of the National Security Forces. 5) The Civil Defense issued a code of conduct in early 2015. 6) The Military Intelligence Service adopted a code of conduct in early 2017.	100
69	The code of professional conduct is disseminated to security personnel and is publicly available	Interview with Major Rakan Ayedi of the Military Training Authority on September 5, 2024.	1. The Code of Conduct is distributed to all new recruits in the Military Training Corps, and they are required to read it. A lecture on the code is also conducted during training. 2. The Code of Ethics and General Code of Conduct for members of the Palestinian Security Forces is published on the website of the Ministry of Interior	100
70	Security personnel and civil servants receive anti-corruption training	Interview with Major Rakan Ayedi of the Military Training Authority on September 5, 2024.	The Palestinian curriculum for Integrity and Transparency training in the Palestinian security establishment has been approved and adopted by the Military Training Authority for different levels of courses. Anti-corruption is integrated into training programs, in cooperation with the Anti-Corruption Commission, in training courses and awareness seminars.	100

71	Security personnel refrain from practices of nepotism and favoritism			معلق
72	A policy is in place to announce results of the trials of security personnel	See/e: Legislative Decree No. (2) of 2018 on the Judicial Authority of the Security Forces: http://muqtafi.birzeit.edu/pg/getleg.asp?id=16993	Article 7 of the Military Judiciary Law stipulates that verdicts are public. However, there is no official security sector policy to make the results of trials available to the public.	50
73	Results of trials are made publicly available	Expert Opinion	The results of the trial are made available to the public, but little information about the charges, the hearing, or other basic details is made available. In many cases, the security establishment takes action against its own members without explanation, as there is insufficient information, due to the absence of the Freedom of Access to Information Act.	50
Special surveillance of intelligence services.				
74	A specialized, independent (parliamentary or governmental) committee is not in place to control policies, management and budget allocations to Intelligence agencies	See: Firas Melhem and Ma'in Barghouti. The Legal Framework Governing the Security Sector in Palestine: An Analytical Study of Legislation Issued after 1994, Birzeit University, Institute of Law, 2009, p. 52.	There is no independent, governmental or parliamentary committee to oversee the security policies of the security services. The National Security Council was dissolved in 2007, while the work of the Legislative Council and its various committees was disrupted following the Palestinian split in mid-2007.	0
75	The oversight of Intelligence agencies' activities, management and budget allocations is effective	Interview with Mr. Omar Yassin, Director General of the General Directorate for Governance Control and Security, 5/10/2024.	The Financial and Administrative Control Bureau (FACB) exercises its oversight activity over most security agencies through tours carried out by FACB employees to the agency's headquarters or directorates, where they audit financial activity. They also exercise oversight through the General Directorate for Military Financial Control by accessing the computerized financial system and reviewing the disbursement mechanisms, invoices, and others, and checking the integrity of procedures. However, a review of the FCA's reports for the past five years shows that the FCA has not published any oversight reports on intelligence agencies such as the General Intelligence Service and Preventive Security.	75
76	Security agencies explain their decisions and the results of their actions to the public			suspended

77	Recruitment in senior positions at the Intelligence service is affected by favoritism	1. Expert opinion. 2. Interview with Brigadier General Ahmed Nazzal, Director of the Training and Planning Department at the General Intelligence, on 11/9/2024. 3. Interview with Dr. Mahmoud Sanallah, Director of the Complaints Unit, on 9/19/2024.	Affiliation with the ruling party is an important criterion for appointments to senior positions such as heads of security agencies. Professionalism plays a role in appointments at lower ranks within the security agencies, especially after the agencies relied on developing the leadership skills of officers and relying on structures and job description cards. In the General Intelligence and Preventive Security Services, leadership positions are assumed according to the approved structure based on the job description card, which sets specialization and degree as a prerequisite for assuming these positions.	50
78	An external committee (e.g. the Governance Integrity Committee) assesses the suitability of nominated candidates	See: The Coalition for Integrity and Accountability (AMAN), The Reality of Integrity and Anti-Corruption 2021. pp. 32-33.	There is no Governance Integrity Commission or any commission that would do such a thing.	0
79	The proportion of discreet expenditures earmarked to Intelligence agencies (General Intelligence and Preventive Security services)	1. Interview with Brigadier General Ahmed Nazzal, Director of the Training and Planning Department at the General Intelligence, 11/9/2024. 2. Interview with Dr. Mahmoud Sanallah, Director of the Complaints Unit, on 9/19/2024.	We were unable to obtain information related to the index due to data confidentiality, as representatives of the security services declined to provide us with the information because they are prohibited by law from providing us with such data.	0
80	An information classification system is established in consistence with the law with a view to ensuring protection of information	1. Interview with Brigadier General Ahmed Nazzal, Director of the Training and Planning Department at the General Intelligence, 11/9/2024. 2. Interview with Dr. Mahmoud Sanallah, Director of the Complaints Unit, on 9/19/2024. 3. Opinion of a parliamentary expert.	The General Intelligence and Preventive Security Services have a special system for categorizing information, how officers and affiliates deal with it, and the limits of access to it. The government has not issued a system for categorizing information to ensure the protection of information, despite the existence of a draft right to information law and a draft national archive law many years ago.	50

Annex (3): Development of Methodology in the Second Report

The Civil Society Forum for the Promotion of Good Governance in the Security Sector introduced several changes to the Index methodology based on the the feedback from the Forum's annual conference that discussed the findings of the Index in 2019 and its meeting of 3/6/2020. The changes are as follows:

1. Three indicators have been deleted: Indicator 5 on "Members of the legislature's security committee have experience in the security sector"; Indicator 52 on "Surveying a sample of companies that supply the security sector"; and Indicator 76 on "Existence of objective selection criteria for senior positions in the intelligence service". The justifications for deleting these indicators were based on the general trend in the world towards the securitization of security sector oversight bodies, as in indicator 5, or the excessive cost of indicator 52, which relies on surveying a sample of companies that contract with the security services, which are scattered, difficult to count, and mostly small, or the importance of measuring practice, so indicator 76 was deleted.
2. Six indicators were merged due to their convergence: Indicators 8 and 10 were merged into one indicator, indicators 55 and 56 were merged, and indicators 70 and 71 were merged to avoid repetition and the high similarity between the content of these indicators with each other.
3. Six indicators based on security surveys were introduced, as they were considered to be similar or close to the indicator that was deleted, or to provide an addition to the field to which the indicator belongs. These additions also allow for the diversification of the sources of information on which the Integrity Barometer relies in the security sector, as about 9% of the total indicators rely on opinion polls, and the rest of the indicators rely on documents issued by security agencies or governmental and civil society organizations, and interviews with security agencies mainly.
4. A new chapter has been added to the quantitative analysis regarding the comparison of multiple readings in the future (the first and second readings in the next report).
5. A paragraph has also been added to the quantitative analysis related to the overall Integrity in the Security Sector scale related to identifying the results of the indicators related to the external environment, and identifying the results of the internal environment of the security sector, indicating the direction of the recommendations related to each of them separately.
6. Adding a qualitative analysis section to read the results of the report in specific angles, to shed analytical light on the topic to be highlighted, presenting challenges or providing good experiences as a model.

Annex (4): The Ministry of Interior and the Palestinian Security Sector's feedback on the results of the Palestinian Security Sector Integrity Index Report 2025

• Ministry of Interior notes.

1. **The methodology on which the Index is based.** It is a seemingly realistic in terms of mentioning its reliance on official sources, interviews, decisions and actions taken by the official authorities and the indicators that were selected for the index were answered through official sources, However, the impact of the answers through official sources on the result of the indicators was not clearly reflected for the better and reflected more positively on the result of the Index.

2. **Regarding the results of the Integrity Index in the Palestinian Security Sector 2022, we mention the following:**

1. The report comes within the program of the fourth phase of the Forum's action plan to promote good governance in the security sector in partnership with the Ministry of Interior within the project to strengthen the governance of the Palestinian security forces for the year 2024, approved by His Excellency the Minister of Interior on 22/05/2024.

2. Pursuant to the instructions and directives of His Excellency the Minister of Interior, the task of the Civil Forum researcher was followed up and facilitated in order to prepare the report of the Integrity Index in the Palestinian Security Sector for 2024 on time.

3. In cooperation with the Civil Forum for Promoting Good Governance in the Security Sector, a set of visits and meetings were organized for the researcher and carried out in the security agencies and relevant bodies according to the report's timeline.

4. On 13/01/2024, the first draft of the above-mentioned report was delivered to the Ministry of Interior, where the scale score for the year 2022 was (62) with an increase (one mark) from the 2022 report, in which the general score was (61).

5. The score of the Integrity Index in the Palestinian security sector in the previous three readings and the current reading: -

Reading	Report Period	Report Final Mark
The general index score in the first reading	2018	56
The general index score in the second reading	2020	55
The general index score in the third reading	2022	61
The general index score in the forth reading	2024	62

6. The Ministry of Interior presented the results of the Palestinian Security Sector Integrity Index 2024 to the relevant security agencies and bodies. The Ministry of Interior and the security sector's comments were prepared and formally delivered to the partners of the Civil Forum for Promoting Good Governance in the Security Sector, where they were included in the report.

3. **Regarding indicators related to legislative oversight.** Legislative oversight is referred to in the indicators while the legislature is not in session, so answers related to legislative oversight can only be accepted if there is a legislature whose oversight is realistically measured.

A. The absence of oversight by the Legislative Council due to its non-convening, yet there is an increase in the overall scale score, which means that it is necessary to analyze and study the real percentage increase that would have been obtained if there was oversight by the Council because

the oversight of the Legislative Council improves performance and contributes to a more accurate and objective oversight, and therefore the percentage increase must be calculated if the Legislative Council was convened and exercised oversight over the actions, practices, budgets, legislation, tenders and procurement of the security forces.

B. Therefore, we suggest deleting the indicators related to the oversight of the Legislative Council because it is unrealistic in light of the complete absence of the Council, noting that most of the indicators related to the Legislative Council had a score of “very low”, and deleting them means that the ratio will increase because the presence of the Council and oversight improves the ratio of the indicator, and in light of the increase in the ratio from last year in the absence of Legislative Council oversight, it necessarily means that the ratio will be better by at least 11 points of the total score of the scale if the Legislative Council is in session and exercising oversight.

4. Regarding indicators related to legislation. The indicators related to the relevant legislation received the highest scores on the scale (a very advanced rating), which means that the answers to those indicators answer that the relevant legislation is good and sufficient and fulfills the required goal in controlling and protecting society from corruption and promoting integrity through the provisions contained in its articles and the penalties contained therein in general.

A. On the other hand, the scale indicated in other indicators and in the results that integrity-related legislation is weak, and this is a clear contradiction that means that the indicators are in part directed and not neutral.

B. Therefore, we suggest reconsidering the indicators that resulted in the “conclusion of weak legislation” and analyzing the answers by looking at the results of the indicators related to legislation, which means an increase in the scale score.

5. The fact that Palestine obtained 62 marks out of 100 marks and its increase (one mark) from the previous scale is good and advanced and can be considered a continuation of continued progress and improvement and calls for reassurance about the desire and political and security will, and we cannot consider that the risks or opportunities for corruption are still possible as stated in the scale, as the scale progresses continuously and with a good mark compared to neighboring countries that have the capabilities, conditions and sovereign decision that we lack more or less due to the complex security environment in which the Palestinian security forces work, which do not spare any effort despite all circumstances and challenges and what the occupation does in terms of incursions and restricting the access of the security forces to all areas under the control of the Palestinian National Authority, and what its agents do internally in terms of strife and chaos. Despite all this, there is progress in the indicators of the scale and this progress reflects the serious desire to provide security service, social protection and the rule of law, which we can consider as progress and creativity and not worrying just because the score is average, noting that the scale scores need to be reviewed for several logical reasons and because there are indicators whose projection on the work of the security forces would reduce the overall index to evaluate the performance of the Palestinian security forces.

6. It is not possible to expand the relations of security sector institutions with civil society organizations in the field of discussing “security policies and strategic plans” due to the confidentiality and caution in most aspects of these matters in order to maintain good performance, and security work is characterized - as in all countries - by privacy and high secrecy in some aspects, and this is important for the success of security work in preventing crime, protecting society and enforcing the rule of law, as well as not sharing all sensitive political and security plans and issues due to their confidential nature and this secrecy required by the public interest and enabling security forces and their arms to perform their duties to the fullest, in addition to the course of events that are taking place.

7. As a result of the exceptional circumstances that the Palestinian security sector is going through due to the exceptional circumstances, the regional and international blockade, and the use of various means, most importantly internal strife and chaos, all of this puts the Palestinian security forces at stake and in suffocating conditions when their affiliation requires them to carry out security work in maintaining security, monitoring community stability, and diligently following up to stand in the face of any attempt of chaos or aggression against persons and property, maintaining a minimum level of security stability, as well as executing judgments and doing their work as administrative control first and judicial control second, all in a dangerous and complex community security environment, which prevents the Palestinian security forces from.

8. Four indicators received a “very low” rating: making security budgets available to the public before they are approved; publishing the results of audits of security agencies by the Financial and Administrative Control Bureau; providing timely information requested by citizens, the media, and civil society on security sector budgets; and regularly auditing security sector spending by the Financial and Administrative Control Bureau, while other indicators related to financial control and comprehensive information on security sector expenditures received an “advanced” rating while other indicators related to financial control and comprehensive information on security sector expenditures received an “advanced” rating. Four indicators received an “advanced” rating, and four indicators received a “very advanced” rating, which is related to the existence of a clear process for the budget planning cycle and the utilization of the recommendations issued by the Financial and Administrative Control Bureau, which means that the report of the Financial and Administrative Control Bureau is published and its recommendations are utilized, which means that the classification of indicators related to the Bureau should be reconsidered and information published as it spreads the truth and is discussed at the level of the public, civil society, and the media.

9. Regarding the indicators related to practices, they need to be answered by the relevant security agencies and bodies, studied and discussed with them to benefit from the nature of their experience and improve the performance of the security agencies and supporting bodies.

10. Conclusions and recommendations for the Ministry of Interior in Scale 2024, The Ministry of Interior and the Palestinian security sector agencies are keen to develop realistic plans to prevent corruption, invest all available resources effectively, improve and raise the level of performance of security institutions, identify risk and remedy factors, and govern security sector institutions. Therefore, based on the directives of His Excellency the Minister of Interior, maximum cooperation was exerted from all competent authorities in the Ministry of Interior and the Palestinian security sector with brothers and sisters working and researchers in the Civil Forum to Promote Good Governance in the Palestinian Security Sector in the preparation of a set of studies and training programs for the Ministry of Interior and the Palestinian security sector. During the past two years, the Ministry of Interior implemented a set of training programs, including workshops, training courses, meetings and conferences in partnership with relevant national institutions in order to serve the Ministry's directives in implementing realistic plans to prevent corruption by effectively investing all available resources to improve and raise the level of performance of security institutions. They are as follows:

A. The Forum's action plan program to promote good governance in the security sector in partnership with the Ministry of Interior within the Palestinian Security Forces Governance Enhancement Project.

1) The Training Center at the Ministry of Interior, in cooperation with the Civil Forum for Promoting Good Governance in the Palestinian Security Sector, has prepared an executive program for the above-mentioned action plan, which is implemented in several stages, and includes holding a set of activities that include workshops, meetings, training courses, research, studies, reports and conferences. It consists of four courses, namely:

- Developing Integrity Enhancement and Corruption Risk Management.
- Developing internal audit follow-up skills.
- Developing the capabilities of public relations and media units.
- Studies, research and reports in the governance of security sector organizations.

2) The total number of program activities reached (60) activities.

3) The total number of beneficiaries of the program activities implemented to date reached (863) officers and non-commissioned officers from the security sector.

4) (13) studies and reports were prepared to improve and raise the level of performance of security institutions, identify risk factors, remedies and governance of security sector institutions. They are: -

- (1) Preparing a report on "Information Management Policy in the Security Sector".
- (2) Preparation of the "Internal Audit and Control Manual in the Security Sector".
- (3) Preparing a report on assessing corruption risks in the Palestinian Police Service, including the risk of gender-based corruption.
- (4) Preparing a report "on assessing the risks of corruption in the customs police".
- (5) Preparing a report on analyzing the sectoral strategy for the security sector 2021-2023 from a general perspective and its role in strengthening governance.
- (6) Preparing the Security Sector Integrity Index 2022.
- (7) Participating in following up on the development of the communication and media outreach plan in the Palestinian security institution.
- (8) Preparing a study on corruption risk management in the Civil Defense Agency.
- (9) Preparing a study on corruption risk management in seizing and destroying illegal vehicles.
- (10) Preparing a study on corruption risk management in the role of the Judicial Police Department in implementing court rulings.
- (11) Preparing a study on corruption risk management in the management of study missions and external training for the security forces.
- (12) Preparing a study on integrity and intelligence services in Palestine. (General Intelligence, Preventive Security, Military Intelligence).
- (13) Preparing the Palestinian Security Sector Integrity Index Report for the year 2024.

5) Work is currently underway to complete the procedures for the following studies that fall within the fourth phase program approved by the Minister of Interior

- (1) Preparing a study on integrity and corruption risk management in (correction and rehabilitation centers and detention centers).
- (2) Preparing a study on integrity and corruption risk management in the Organization and Administration Authority.
- (3) Preparing a study on the AMAN Coalition's vision for reforming the Palestinian security sector.

6) Conferences of the Palestinian Security Forces Governance Program.

- (1) Integrity in the Palestinian Security Sector Conference 2018 (first).
- (2) Integrity in the Palestinian Security Sector Conference 2020 (second).
- (3) The Reality of Integrity in the Palestinian Security Sector Conference 2022 (third).
- (4) Youth Summit 2022.
- (5) Yearly Conference for "Safety" 2024 Political Integrity in Crisis and Disaster Management in Palestine

B. Integrity and Transparency Training Program in the Palestinian Security Establishment. Since mid-2017, the Ministry of Interior began implementing a project to enhance integrity and transparency in the Palestinian security sector institutions. The project is implemented in cooperation and partnership between the Ministry of Interior, the Anti-Corruption Commission, the Financial and Administrative Control Bureau and the British Royal Defense Academy through the British support team, where a Palestinian training team was formed, trained and qualified a Palestinian training team that prepared a national curriculum for integrity and transparency training in the Palestinian security institution according to international integrity standards, and a series of courses were implemented, from which (540) Palestinian officers from the rank of lieutenant to the rank of general from members of the security sector have benefited to date.

c. Code of Ethics and General Code of Conduct training program for Security Forces personnel.

1) The Training Center at the Ministry of Interior, in cooperation with the Center for the Defense of Civil Liberties and Rights, prepared the above-mentioned training program, which is implemented in several stages. The target group of the program is employees of the Ministry of Interior, security agencies, bodies and directorates, and aims to provide them with knowledge, skills and attitudes about what the code of ethics and general rules of conduct for members of the Palestinian security forces is. The total number of beneficiaries of the Code of Conduct training reached (1043) officers and non-commissioned officers from the Palestinian security sector.

2) The Ministry of Interior Training Center designed the training program for the training of the Code of Ethics and Code of Conduct for Palestinian Security Forces - Istiqlal University for the year 2025, in partnership between the Ministry of Interior, the Center for Defending Freedoms and Civil Rights (Hurriyat) and Istiqlal University, where the training program includes implementing (4) training sessions, targeting 240 trainees, and will be implemented during the period from 7 to 30/4/2025.

D. Introducing the Anti-Corruption Law and supporting regulations in the Palestinian Security Forces and the police.

(1) The Ministry of Interior team, in cooperation with the Anti-Corruption Commission, prepared and designed the above-mentioned training program, which was implemented during the year 2022-2023 at the Palestinian National School of Administration, and at the headquarters of the Palestinian Police Force in all governorates.

(2) (28) training courses were implemented, with a total of (524) officers and non-commissioned officers from the Palestinian security forces and the police, who benefited from the program of introducing the Anti-Corruption Law and supporting regulations.

(3) The target group of the program is employees in all Palestinian security agencies, bodies and directorates, with the aim of introducing them to the Anti-Corruption Law No. 1 of 2005 and its amendments, witness and whistleblower protection, the conflict-of-interest disclosure system, the gifts system, and financial disclosure statements.

(4) The program consisted of two sections and was implemented as follows:

- The first section: Training the security services, where (11 training courses) were implemented within the program, where the total number of officers and non-commissioned officers who benefited from the training reached (188) trainees. Of the above-mentioned target group.
- The second section: The program was implemented in the police directorates in the governorates and includes (17) training courses, from which a total of (336) officers will benefit.

- **Military Financial Management Notes.**

1. Procurement issue. Procurement is generally carried out in accordance with the rules and regulations.
2. Fictitious salaries. There are no ghost salaries in the Palestinian security sector, and salaries are paid through the banks to those who are entitled to them (actual employees) according to the rules.

