



Coalition for Integrity and Accountability – AMAN

Report about

**National Anti-Corruption Plan in Palestine: Concepts, Requirements,
Regional and International Models**

2018



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Introduction:

The Palestinian National Authority (PNA) achieved significant progress in fighting corruption. The efforts included promulgation of the Anti-Corruption Law for the Year 2005, as amended, establishment of the Anti-Corruption Commission and creation of Anti-Corruption Special Courts in addition to the signature of United Nations Convention on Anti-Corruption (UNCAC).

The government further adopted integrity promotion and transparency directions showing greater openness to and involvement of the local community in the preparation of sectoral plans. It also raised the slogan of accountability and citizens' rights to submit complaints. The National Policy Agenda was themed "Citizen First: 2017-2022). The Fifth Priority in the Agenda covered reform directions related to combatting corruption and preserving public funds under the title of "effective government". In turn, policies 9 and 10 on "Promoting Accountability and Transparency" and effective management of public funds. Additionally, the Anti-Corruption Commission (ACC) exerted efforts to combat corruption in application of the law, which prescribed for its role in this regard. It also adopted the National Anti-Corruption Strategy (2015-2018), which succeeded its previous Strategy for (2013-2015). Moreover, ACC signed MoUs with several agencies with the objective of raising awareness of the Strategy and the law and introducing the concept of reporting on cases of corruption. Civil society organizations joined efforts to combat corruption and establish the national integrity system, mainly through the Coalition for Integrity and Accountability (AMAN), which has been promoting integrity, transparency and community oversight and accountability since 2000. As a result, AMAN has become expert in the production of knowledge on fighting corruption and consolidating a national integrity system. On another note, the

Palestinian Capital Market Authority (PCMA) adopted the principles of governance with standards and a code of ethics to regulate the activities of the private sector.

Notwithstanding these non-negligible governmental and nongovernmental efforts, fighting corruption and establishing a national integrity system still require a global, participatory and cross-sectoral national strategy duly promulgated similar to other cross-sectoral national plans and with allocation of necessary funds. Such strategy also requires action plans with specific time-frame, and evaluation process against clear quantitative and qualitative indicators to measure progress, milestones and assess gaps while allocating roles to different stakeholders. Production of such a national plan or strategy is a major breakthrough toward the achievement of the agreed-upon national goals since it is the most important tool for collective action against corruption.

Some claim that the ACC's Anti-Corruption Strategy is one and parcel as the National Anti-Corruption Plan; but objective analysis shows that the ACC's strategy is not comparable to the national strategy for: ACC's Strategy 2015-2018 is exclusive to the Commission and its efforts. With this Anti-Corruption Strategy coming to its term in 2018, it is opportune to conceptualize and adopt a comprehensive national plan to combat corruption and duly approve it as per applicable governmental procedures for the adoption of such cross-sectoral plans. As such, ACC shall assure the leading and guiding role for the implementation of the Plan.

The report is prepared in the absence of a comprehensive national anti-corruption plan, which is a key challenge to the Palestinian National Integrity system. In the absence of such a plan, all anti-corruption efforts shall remain fragmented relying on incomplete individual initiatives. Most existing anti-corruption plans, and

programs focus on dispersed activities that respond to ad-hoc needs in a particular area. Such efforts or programs fade out with the drying out of funds or elapse of their duration.

The current situation is thus an absence of a comprehensive national plan led by the government and involving different sectors and areas covering various tracks including the application of laws. Such a plan would be redrafted and amended to fit the anti-corruption efforts and include awareness campaigns through the media with focus on corruption cases. It would entail a redefinition of concepts to fit anti-corruption efforts and would allocate the necessary financial and moral support to encourage citizens to report on cases of corruption under a full protection system, prescribed in a Law on the Protection of Corruption Whistleblowers. The strategy would also include motivations for expedite justice and pronouncement of judgments in the cases of corruption. It would give priority to a culture of ongoing monitoring and evaluation in public, civil and private institutions.

The present report aims to crystalize and identify a national cross-sectoral anti-corruption plan while highlighting its vital role and preparation requirements as well as partners. It focuses on the necessity to approve and finance such a plan and discusses its correlation to other national strategies, mainly to the National Anti-Corruption Strategy. The report further displays regional and international models of such cross-sectoral anti-corruption plans. It adopted a descriptive, analytical and comparative methodology in gathering related data from first-hand sources like ACC, AMAN Coalition and interviews with stakeholders.¹

What is a National Anti-Corruption Plan?

¹ The researcher interviewed stakeholders but – albeit many and rigorous attempts – did not succeed in interviewing the Presidency Office and the Ministerial Council. No convincing reasons were given for such refusal to cooperate with the researcher.

The National Plan is the reference document of all public activities and policies adopted to achieve goals of promoting integrity and combatting corruption within a specific time frame, using available resources including: legislation, budgets and human resources. It is usually prepared through a consensual participatory approach involving governmental organizations, civil society organizations and the private sector. It identifies partners and their roles in the implementation of the strategy and prescribes monitoring and evaluation tools and mechanisms. It must be consistent with the Palestinian National Policy Agenda, which focuses on building state institutions and promoting their capacity in performing their roles in full partnership and collective efforts of governmental institutions, local government units, civil society organizations, private sector and academic establishments. It must be based on genuine partnership and engage all components of the society, to ensure the opinion of different groups is reflected in the final plan following intensive consultations. The plans in the National Policy Agenda focuses on reform, future building and promotion of transparency and accountability². Thus, preparation and leadership of the plan must be the responsibility of the government as part of its role in preparing and monitoring the enforcement of public cross–sectoral policies and plans, as per Article 69 of the Basic Law.

The National Anti–Corruption Plan must cover several parameters that will be discussed later since their implementation will ensure a solid national integrity system that immunizes all parties against corruption in application (preventive axe). It should also prosecute and indict the corrupts and prevent that they enjoy impunity or benefit from their corrupted acts. The plan must also provide for regional and international cooperation to prosecute fugitives and perpetrators of corruption acts

² Palestinian National Policies Agenda 2017-2022, pp. 8-30

and embezzlement of public funds with acts to reconstitute such illicitly gained assets and funds (therapeutic axe).

As such, the National Plan becomes a global and comprehensive framework, which needs a consistent action (implementation) plan to achieve its objectives using different programs involving all anti-corruption stakeholders. The action plan requires periodic monitoring and evaluation by all partners to monitor progress against smart quantitative and qualitative indicators. It then requires prescription of necessary interventions – when needed – to redress or reconsider any aspects of the plan in order to ensure achievement of strategic goals.

ACC prepared its second anti-corruption strategy 2015–2018, which is a remarkable progress. Still, this strategy does not represent a “national strategy” for combatting corruption because it does not fulfill the criteria of a national plan including participatory preparation engaging all governmental, nongovernmental and private sectors together with local authorities and the academia. Consultations with representatives of all these sectors is a prerequisite of a national plan so that roles and responsibilities of each party can be defined. ACC’s plan also lacks monitoring and evaluation mechanisms to measure the level of commitment to implementation and does not provide for an action plan with specific time frame. In a national plan, ACC would act as a secretariat general or an executive office to promote integrity and accountability and ensure involvement of all stakeholders since it is a key implementing agency of the plan³.

The National Strategic Plan prepared by ACC resulted from efforts of ACC and a number of civil society organizations, without any real community participation. It

³ AMAN Eighth Annual Report 2015, Situation of Integrity and Anti-Corruption efforts, p. 18.

only defines ACC's role in fighting corruption as it relates to other parties without specifying any role distribution across (official) governmental, civil or private institutions or local government units or academic establishments, as would be specified in national plans. For comparison purposes, over 240 consultation sessions were held with the parties contributing to the preparation of a national strategic plan.

Dr. Hamdi Al-Khawaja, Director General of Planning at ACC explained that the Anti-Corruption Strategic Plan is a roadmap, but not comprehensive. He asserted it suffered several gaps since it addresses Palestinian needs for the development of the bases of transparency and integrity and the creation of a corruption-repulsive environment but lacks binding mechanisms for its enforcement and for mitigation of the spread of corruption. It also encounters several implementation obstacles including lack of commitment of several parties to the strategy and its action plan⁴.

General Framework for a National Anti-Corruption Plan

The scope of the national plan must include all of the Palestinian society where every agency would play the role relevant to its competences, complementing other agencies' efforts in fighting corruption and promoting the national integrity system. This requires a fully operational legislative power exercising its legislative and oversight role and an independent judiciary that plays a role in combatting corruption and consolidating the rule of law. The executive power (the government) will be in charge of enhancing such practices in the Palestinian public sector including ministerial and non-ministerial institutions and other internal and internal agencies and control mechanisms. It also extends to the role played by civil society organizations and the private sector.

⁴ Interview with Hamdi Al-Khawaj, Director General of Planning at ACC, on 10 May 2018

Preparing a national anti-corruption plan requires, *inter alia*:

- 1- **Inclusion of all partners:** This means all governmental, civil society, private sector, local government units and academic sectors to achieve a vision and implement the mission of corruption-free society. The plan must be implemented by all components of the society regardless of any person's/institution's status or influence.
- 2- **Inclusive scope of action:** to include promotion of the values of integrity and application of transparency with active accountability systems and preventive and punitive measures applicable [equitably] to all. This further requires consolidation of judicial and administrative procedures and measures to prosecute perpetrators of corruption acts and foster cooperation with international organizations and foreign states for organized anti-corruption efforts so that all countries cooperate to prevent impunity of perpetrators.
- 3- **Distribution of roles and responsibilities to partners with accountability system:** partners participate first in the drafting and preparation of the national strategy/plan and then monitor its implementation by all parties.
- 4- **Allocation of necessary funding for implementation:** budgets and allocations approved to serve the implementation of the plan together with qualified human resources who receive adequate training to ensure effective and active enforcement.
- 5- **Time schedule:** which specifies the duration of every activity with time frame and deadlines and ongoing monitoring and evaluation to prepare the necessary interventions in case of deviation, lacuna or obstacles. The national plan is bound to a time ceiling to regulate monitoring and follow up and assess progress in terms of fighting corruption and ongoing monitoring of potential areas of corruption.

6– Action/ Implementation plan: prepared by partners and adopted as a reference document, provided it is bound with a specific time schedule and periodically applied smart performance measurement indicators. The necessary trained human resources and financial resources must be provided together with a capacity building plan and sufficient financing to cover it. Awareness campaigns to upgrade the capacities of implementing parties. It is important to designate a coordinating agency and prescribe its relevant responsibilities with clear coordination mechanisms among all parties to combat corruption. This may include periodic meeting, production of reports and follow-up, monitoring and evaluation exercise so that the action plan can become credible and viable consistent with the progress achieved and new corruption issues and risks.

7– Definition of Monitoring and Evaluation and Performance Assessment

Criteria: a key document to be agreed upon and ratified by all parties is the evaluation criteria, at both administrative and institutional levels to ensure:

- Existence of an actionable, written, and complementary plan that is understood by all parties, and which includes:
 1. Clear distribution of roles among all parties;
 2. Written and verifiably clear instructions on the sequence of operations;
 3. Public policies and directions to be implemented are clear;
 4. Efficient, effective and adequate forms;
 5. Evaluation of expenditure to assess whether government funding is sufficient and if expenditure is rational;
 6. The plan reflects the internal organizational infrastructure and distribution of departments to assess the adequacy of organizational structures and employment policies.

- Progress assessment and evaluation of compliance with activity implementation and laws and regulation;
- Internal control system (internal control unit) and its monitoring and development;
- Periodic assessment of employees every end of year;
- Use of feedback.

Key Parameters of National Anti-Corruption Plan:

Similar to other national plans and strategies, a national anti-corruption plan must diagnose the situation on the ground and assess the strengths, weaknesses, threats and opportunities in general and in specific to identify the causes of corruption and its presentation and outcomes.

A national anti-corruption plan must adopt a participatory approach in its preparation, engaging all stakeholders. The discussions and deliberations involving different components of the Palestinian society ensure reflection of community opinions, which then qualifies the plan as “national” rather than “governmental”. Community discussions must display genuine participatory approach throughout the preparation, implementation and assessment of the plan. The following shall be adhered to in preparing the plan⁵:

- 1. At legislative level: finalize anti-corruption laws:** to provide for a comprehensive legislative system with laws and regulations that promote transparency, integrity and accountability. The review at hand aims to amend some laws and enact new ones to foster integrity and prevent corruption. This includes amendment of the Jordanian Penal Code No 16 for the Year 1960, still in effect in Palestine to make it consistent with the United Nations

⁵ الجبوري، نصير ، صبار ، لفته ، نحو خطة وطنية شاملة لمكافحة الفساد ما بين حق المواطن وواجب الدولة ، مقالة منشورة على الانترنت ، تم الدخول في 15/5/2018 الساعة 12 ليلاً. الرابط <https://scholar.google.com/citations?user=wfXPpEcAAAAJ&hl=ar>

Convention Against Corruption (UNCAC) and toughen penalties on corruption offenses.

2. **Adoption of public policies to foster transparency and integrity:** This will reduce the chances of corruption, especially as regards services provided to citizens and will enable the media to take part in the accountability process and disseminate information with focus on highlighting the value of integrity in school and university curricula. Such values must be reinforced in management of public funds, recruitment, procurement and internal control. At the international level, agreements to consolidate anti-corruption efforts are needed as well as continuing training of public servants on the public service code of ethics.
3. **Activate Public Oversight and Monitoring Agency:** This includes developing public oversight agencies including ACC, State Audit and Administrative Control Bureau (SAACB), the Ombudsman and internal control units in public institutions together with monitoring and inspection in all sectors; the executive power shoulders the largest responsibility in this regard.
4. **Rely on the community and promote its role by raising public awareness of corruption, its phenomena, causes, forms and effects on the society as a whole:** through activities, symposia to disseminate anti-corruption concepts. This role can be shouldered by civil society organizations, universities, research centers, private sector, and the media to raise awareness and incite whistleblowers to report on cases of corruption; this also includes immunizing the society against committing corruption. Every part of the community has a role to play. Periodic bulletins on cases of corruption, accountability, transparency and integrity of all community organizations with comparison between the levels of corruption in the public

and private sectors. It is also necessary to ratify a law or a regulation to protect reporters of corruption and encourage citizens to report on cases of corruption. The purpose is to immunize the society against corruption.

Step by Step Preparation of National Cross–Sectoral Anti–Corruption Plan

I. Review existing legislations:

Legislations play a key role in establishing a national integrity system to counter corruption, especially with community awareness and an independent, neutral and integrate judiciary system

Full harmony across legislations and between them and the Palestinian Basic Law as well as international conventions and agreements to which the Palestinian National Authority has adhered, mainly UNCAC, is paramount to ensure comprehensive legislations capable of establishing a national integrity system. This requires revision of a number of corruption related laws and prevention of corruption in public and other institutions to foster the values of integrity and accountability either by enacting or amending laws to harmonize them with the Basic Law and international conventions ratified by PNA. This can be achieved through two things;

- Harmonization of existing legislations to foster the values of integrity, transparency and accountability systems;
- Promulgation or amendment of necessary decrees, resolutions, implementation regulations and instructions.

Harmonization of legislations involves promulgation or amendment of implantation regulations with detailed activities to ensure participation of all stakeholders in any legislation. This needs research and assessment of all aspects prior to proposing any law or amendment.

II. Establishment of a national team to monitor the drafting, implementation and assessment of the national anti-corruption plan

The best practices would be a presidential decree or ministerial council resolution establishing a national taskforce to prepare and implement a comprehensive Palestinian anti-corruption plan. Members will be nominated by ACC provided they are experts in anti-corruption, reform or good governance. Members shall include key partners in anti-corruption efforts including ministries, public administrations and other institutions that shall delegate representatives to the team among their staff in charge of planning and decision-making. The team shall also comprise representatives of the civil society, nongovernmental organizations, the media and other human rights institutions in addition to representatives of relevant private sector and organizations working in enhancing integrity, good governance and anti-corruption like AMAN coalition and Governance Institute among others. The team shall prepare the national anti-corruption plan and its performance indicators and shall distribute roles to all parties with specific tasks consistent with each partner's experience and competences. To add more value to the national team's efforts, the national plan it proposes shall be ratified similar to other national strategic plans ratified by the government through a due process.

Presidency of the National Team:

- ACC shall preside over the national team or act as its secretariat; it shall supervise and coordinate efforts, prepare meetings and joint workshops and send invitations to members in addition to writing minutes of meetings. It will add amendments to the national plan drafts until nationally duly ratified. It shall follow up on the implementation of the plan upon its release in a public national conference. It shall send invitations to the conference and request

official presence of the President and government. It shall prepare periodic progress reports and assess progress toward achievement of goals to submit to the national team for discussion and lessons learned. It shall submit recommendations to relevant parties and publish public reports to citizens after submission of copies thereof to the President and Head of the Ministerial Council and Speaker of the Legislative Council.

- Because integrity and anti-corruption efforts are complicated and complex, it is preferred to establish task forces to expand and deepen the circle of consultations among all parties including a public awareness task force, public funds and affairs official oversight promotion task force, think tank on methods to limit favoritism (WASTA), task force to combat corruption in the private sector, task force to follow up on trials in the corruption court and publish its news, etc. every task force shall elect a president and rapporteur and adopt a simplified internal bylaw to govern its work and explicate quorum and decision-making mechanism. It shall convene upon invitation from its president to address issues of diagnosis and analysis of the Palestinian situation in this sector or area relevant to the system of anti-corruption and shall specify challenges and recommendations to submit to the national team.
- The national team shall review progress and evaluation reports submitted by all implementing parties including reports on sectoral threats and recommendations to ensure full coordination and coverage of all issues related to integrity and anti-corruption and to ensure lack of any interventions that may halt the implementation of the plan.
- The national plan shall be announced in a national conference under the auspices of the President of the State of Palestine with participation of all stakeholders from the government and other Palestinian official, popular and

civil organizations as well as international organizations operating in PNA areas and donor agencies.

- The government shall take all necessary procedures and issue instructions to ensure implementation of the Palestinian national anti-corruption plan by all community representatives since it is part of its general plan. The government shall allocate sufficient and adequate budget to implement the plan and activities in the action plan.
- ACC shall take all necessary measures to provide for financial allocations to implement the plan in cooperation with the government. It shall publish the plan on all available media and shall launch a global national awareness campaign in addition to preparing a capacity building plan as needed.
- The national team shall convene periodic meetings upon the invitation and under the presidency of ACC to follow up on plan implementation and formulate recommendations. It shall discuss the period reports prepared by ACC on the progress of the national plan.
- ACC, acting as national team president (or secretariat) shall publish progress reports on all available media.
- The national team shall hold an annual national conference to present its annual report on the progress of the national plan and the impact it achieved. It shall identify the threats and opportunities. The conference will be a means to hold the national team and other partners accountable for the implementation of the plan and shall ensure increased transparency and assessment on continual basis to devise opportune solutions. It shall also address the financial situation and submit next year's budget explicating the items of expenditure.

III. Background and context Analysis

Conduct specialized research and study on the current status of anti-corruption efforts and the national integrity system with analysis of both internal and external environments to consolidate the national integrity system, rule of law and anti-corruption. It is important to diagnose the general political and socioeconomic environment and assess its adequacy to fighting corruption and to identify the threats and obstacles caused by the current political and economic situation. This leads to proposing specific interventions and actionable recommendations, which may lead to amending plans and activities previously agreed upon the action plan must be reasonably flexible.

Building on the importance of an institutional culture to prevent corruption of all forms in all institutions, especially considering different systems and procedures applicable in each institution, any capacity-building program must cover comprehensive and complementary mechanisms to enable an immunized environment in public institutions through:

- Supply of technically qualified human resources with optimal ethics as stated in the public service code of ethics; motivate servants to provide services in an appropriate and ethical manner.
- Prescribe clear and circulated regulations to all staff on financial and administrative issues and on programs and policies applicable to task performance in public institutions.
- Devise monitoring and evaluation mechanisms with clear quality criteria and performance assessment indicators.

IV. Capacity Building

Building on the importance of an institutional culture to prevent corruption of all forms in all institutions, especially considering different systems and procedures applicable in each institution, any capacity-building program must cover

comprehensive and complementary mechanisms to enable an immunized environment in public institutions.

V. Community Awareness

Community awareness is a key pillar in any integrity system since it identifies the extent of spread of corruption in a given community. Most public institutions officers are part of the community and their awareness and culture is the extension of a culture acquired in the household, school, street and sociopolitical frames. Interventions must focus on raising awareness of all the pillars of the integrity system as is the case in legislation, monitoring and institutional capacity building. Mechanisms should focus in soliciting citizens' interest in immunizing themselves first and then preventing any form of corruption in the society through:

- Raising citizens' awareness of all forms, causes and combatting mechanisms of corruption.
- Reiterate social values and preservation of public funds, as property of citizens while disgracing *wasta* and favoritism and bribes of all forms with focus on the right of tax payers to hold public servants accountable and to access information.

VI. Monitoring

.An ongoing monitoring and evaluation of the national plan by an independent commission to ensure participation of all stakeholders in M&E on short intervals to fill in any existing gaps in a timely manner⁶.

⁶ Interview with Mr. Hindam Rjoub, Human Rights Officer, OHCHR, on 22/May/2018

Methodology for Preparing National Anti-Corruption Plan

Steps to prepare the national plan:

- Analyze internal and external environment of promotion of the national integrity system and consolidation of the rule of law and fighting corruption; data must be collected, processed and analyzed prior to organizing specialized workshops by the national team to prepare a SWOT analysis and assess the threats hindering the National Integrity System and anti-corruption effort. A summary of the findings must be prepared and shared with stakeholders.
- Organize a workshop with all stakeholders to review the findings and prepare a comprehensive national plan focusing on:
 - 1- Review and development of vision.
 - 2- Review and development of mission.
 - 3- Review and development of strategic goals.
 - 4- identify programs and needed interventions as an outline of the action plans.
 - 5- Identify performance measurement indicators for activities and strategic projects.
- Hold consultation meetings with all parties at the national level (public, private and civil sectors).
- Develop detailed action plans and identify the necessary resources for their implementation after adoption of the comprehensive national anti-corruption plan.
- Develop a monitoring and evaluation system (outputs, targets, performance indicators after adoption of the comprehensive national anti-corruption plan).
- Form a steering committee to lead the implementation of the national anti-corruption plan.

International Experiences

Comparative review of preparation of national and sectoral anti-corruption plans

To benefit from experiences in other countries:

1– Bulgaria:

Bulgaria launched its anti-corruption efforts in 1997 following widespread corruption at all political, social and economic levels. Governmental and civil organizations encountered corruption via a comprehensive integrity, transparency and accountability-based legal system. A national plan “National Anti-Corruption Action Plan” was adopted together with a political and economic reform program. Furthermore, civil society organizations, nongovernmental organizations, economic establishments and other agencies organized under non-governmental corruption monitoring and follow-up agencies nationwide⁷.

Information available on the Bulgarian plan showed that it targeted:

- declaring Bulgaria as a corruption-free state;
- activate popular participation;
- create an effective public sector;
- realize integrity and transparency;
- Identify problems and threats accurately and transparently to devise and propose solutions.

● Foundations of the Bulgarian Anti-Corruption Plan⁸:

⁷ An opinion poll showed that 75.6% of Bulgarians believed that corruption affected them and their families directly, while three out of four believed that corruption had direct effect on economic life.

⁸ Report on Kuwaiti Transparency International under the title (States Anti-Corruption experiences) on link: <http://www.transparency.org.kw.au-ti.org/ar/index.php/books/administrative-corruption/554/تم>, logged in on Monday 14/5/2018 at 3.00 am, p. 3

– A strong government fully aware of the serious effect of corruption on socioeconomic development; it undertook anti-corruption efforts while the main success factor was the strong political and popular will to abolish corruption.

– salient role by the government in fighting corruption, concentrating efforts in the Ministry of Interior and moving to other ministries and state sectors. In other words, the Ministry of Interior was entrusted with fighting corruption.

– **Amendment of laws and regulations:**

Following Bulgaria's accession to the European Union, it introduced a package of reforms in the judicial and legal systems with support from other member states to eliminate corruption. New anti-corruption laws were drafted with deterring punishments against corrupted people to reduce corruption. In the beginning, implementation of the new laws was difficult and hindered because of insufficient coordination among judicial agencies. But, when the legal situation settled, application became easier and more effective.

– **Active involvement of the civil society in anti-corruption efforts:**

Bulgaria is among the most successful states in fighting corruption following effective community participation and alliances between the private and public sectors; this led to the formulation of a national anti-corruption strategy for the period 2001–2004, placing Bulgaria in an advanced rank on the list of states that combat corruption.

– **International Assistance**

Bulgaria's accession to NATO and the EU boosted success of its national anti-corruption plan as it benefited from the aid in received to eradicate all forms of corruption, mainly economic. Efforts were made to place Bulgaria on the same rank as other EU countries to create a corruption-free society, similar to other EU states.

– **Outcomes of Bulgaria's National Plan**

- Transparency International statistics for the years 1997–2004 showed that Bulgaria shifted from a heavily corrupted state to a country with limited corruption⁹.
- implementation of the national anti–corruption plan also led to noticeable drop in the cases of corruption from 180,200,00 in 1998 to 90,90,000 in 2004.

– **Ensure Plan’s Sustainability**

Following ratification of the National Plan, corruption dropped till 2004, until it showed another increase unveiling weaker anti–corruption mechanisms after the elapse of a few years. Thus, the government reviewed its national plan focusing mainly on:

A– Abolishing corruption–inducing structures;

B– Ensuring an integrate and independent judicial system;

C– Upgrade performance of public service to be fully satisfied and prevent any thinking of committing corruption;

D– Applying deterrent punishments on perpetrators and preventing occurrence of corruption.

By reviewing the Bulgarian experience, we can conclude that its success stems from its nascent democracy and shift from authoritarian and chaotic regime into an institutional state.

2– The Indian Experience

India has made great progress in the reform and anti–corruption efforts after years of political and political corruption although 25% of the population live below poverty line.

Corruption in India was visible and public as citizens were obliged to pay bribes to receive government services and the services were very primitive. The solution

⁹ Indicators of several international organizations ranked Bulgaria among best scores in states of middle and east Europe in fighting corruption; it ranked 54 among 133 states in 2005

was to introduce modern tech to ensure transparent and honest access to services of the government.

India, sensing the high penetration of corruption across all state institutions, initiated a reform process for internal and external reasons:

1. People's will to eradicate corruption and government shared the same will;
2. Demands submitted to the government to proceed with a comprehensive reform process;
3. Political will to eradicate bureaucracy and its resulting corruption;

Civil society organizations collaborated with the government and consolidated efforts were key to success. Transparency became a principle applied in all arena and democracy grew stronger together with national security.

Furthermore, India signed UNCAC and prepared an action plan to fight corruption with:

- Mechanisms to combat corruption
- Reform of civil society to alleviate bribes;
- Activation of civil society's role in fighting corruption.

India further collaborated with the EU to fight corruption and this contributed to:

- Participation of the civil society and private sector in anti-corruption efforts;
- Political reform nationwide with the creation of anti-corruption commission.

Findings:

Although there is a National Policies Agenda (2017–2022) and ACC Strategy (2015–2018), up till now, no national cross–sectoral, comprehensive, objective participatory anti–corruption plan has been prepared with involvement of all governmental, civil and private sector representatives. To date, there is no plan with annual action plan with clear activities and interventions and distribution of roles and time frame and reporting mechanism for monitoring and evaluation. The

plan was not prepared and adopted duly by the Ministerial Council similar to other national plans.

Lack of a comprehensive plan disperses anti-corruption efforts, rendering them mere individual initiatives. This situation limits anti-corruption efforts to prosecution and indictment of corrupts without sufficient attention to immunity and preventive efforts to limit occurrence of corruption in governmental, nongovernmental and private institutions and to address its causes and build a public opinion that combats its phenomena.

It is paramount that all stakeholders contribute to the preparation of a national cross-sectoral anti-corruption plan to embody the national anti-corruption efforts, as consistent with the objectives of the National Policies Agenda on promotion of integrity and transparency and in harmony with the UNCAC.

Recommendations:

Urge the government to adopt and ratify the “National Cross-Sectoral Integrity and Anti-Corruption Plan” as duly ratified other cross-sectoral national plans. Different governmental, nongovernmental and private sectors must participate in the definition of priorities and implementation steps as well as responsibilities of every party or institution in the implementation of the national plan according to a specific and clear time schedule. As such, ACC will coordinate efforts, being the secretariat for anti-corruption. An objective budget must be provided to implement the plan, as an evidence of serious will to combat corruption and establish an integrate public administration.

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1. Interview with Dr. Hamdi Al-Khawaja, Director General of Planning, ACC on 20.5.2018
2. Interview with Dr. Ahmad Abu Dayyah, Director General of Parliamentary Committees, PLC, 20/5/2018
3. Interview with Mr. Ayman Shahin, Director of Studies and Legal Counselling, SAACB, 23/4/2018
4. Interview with MR. Hindam Rjoub, Human Rights Officer, OHCHR, 22/5/2018



The Coalition for Integrity and Accountability (AMAN) which was accredited by Transparency International (TI) as a national chapter in Palestine since 2006 – established in 2000 by an initiative of number of CSOs working in the field of democracy, human rights and good governance towards reaching its vision of *Palestine free of Corruption*.

The Coalition is keen to create and lead a social movement against corruption and to contribute in the production, transferring and localization of the necessary knowledge in anti-corruption at the local, regional and international level.

The Coalition is also keen to play its monitoring/watchdog role on the National Integrity System through focusing on community participation, activating the role of civil society institutions and media in monitoring management of public money and affairs, and creating a work environment that contributes to unclose corruption crimes and restrict its spread.

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