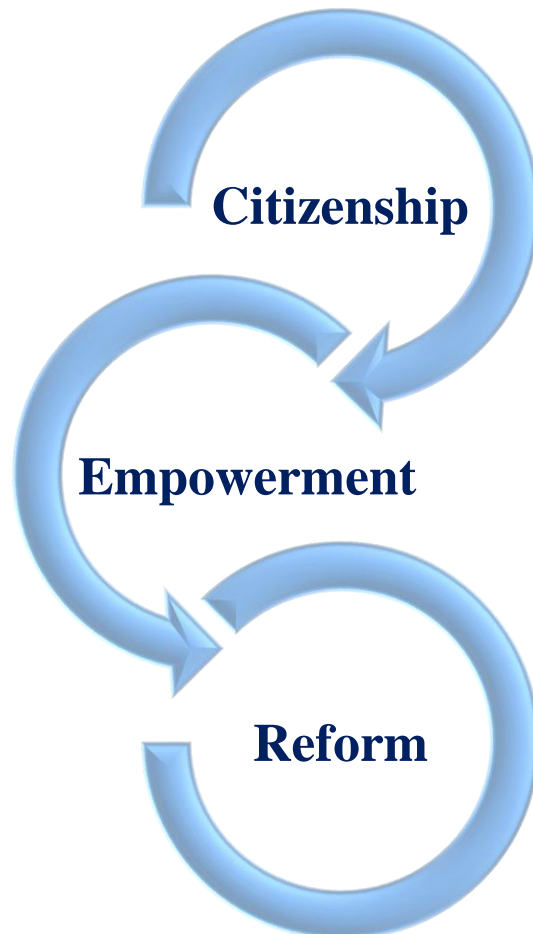




**The State of Palestine**

# **The National Cross-Sectoral Strategy for Integrity and Anti- Corruption**

**2020-2022**



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## **Section I, Methodology: A consensual work to set priorities and to frame efforts aimed to empower the system of integrity and anti-corruption**

### **Introduction**

Corruption harms states and societies, and its vicious crisis has damaged the communities' structure over the years. Unfortunately, countries around the world only became aware of corruption after it has aggravated, and they started to take collective efforts to find solutions for it. They have been aware since the beginning that there is no definitive solution for this crisis. In addition to the aforementioned the international community realized to be in the position of the observer will contribute strengthens it and shall eliminate the states capacities regardless of their level and classification, draining them from their capacities, corruption leaves countries with poverty and unemployment as an inescapable result.

Corruption is the main cause of failing the development efforts and is the cause of poverty entrenchment. Corruption, therefore, undermines the capacity of achieving development goals relevant to welfare of the State's citizens, guaranteeing equality and justice, building state of law. Corruption drains the vast portion of the allocated finance resources for development programs; it undermines the citizen's trust in government's efforts in improving the living standard and to drive development forward. Furthermore, it restrains the noble and equality-based competition.

Realizing the dimensions and impacts of corruption, through the United Nations countries called for tackling this issue. The answer for their call was represented through establishing The United Nations Convention against Corruption (UNCAC), which was endorsed by the UN General Assembly in 2003, and it entered into force in 2005 as one of the first instruments of the international community for combating corruption.

In the same vein, Palestine to keep up and to be in harmony with the international direction; established Palestinian Anti-Corruption Commission in 2010. Palestine acceded UNCAC in 2014 as a fully-fledged member, after it was approved as an observer member in the UN. In light of the new international context, it was a breakthrough for the Commission given to the new international position of Palestine.

Combating and controlling corruption, demonstrated the need to set and implement efficient policies and procedures. These policies and procedures shall include raising social awareness on its risks, prosecuting and holding its perpetrators accountable. In like manner, the parties of implementing Strategy, headed by the Commission, launched a national anti-corruption strategy for the upcoming three years. The aforesaid strategy is the first since the establishment of the Palestinian National Authority in 1994. A set of needs emerged and was addressed by the second strategy 2015-2018.

The evaluation report on the implementation of 2012-2014 strategy showed the big effort aimed to engage as much as possible of the concerned intuitions with combating and preventing corruption. Their efforts materialized through implementing interventions that elevated the Palestinian status on the international transparency index. Many efforts paid off and the achievement of the Palestinian vision towards a corruption-free Palestinian

community is still in process. Despite the ongoing Israeli occupation, and the resulting fragmentation of the West Bank and the Gaza Strip, and its unending Judaization of Jerusalem and tightening its grip on it.

Provided the Palestinian Anti-Corruption Law No. (1) of 2005 and its amendments, represented in **setting a general policy to combat corruption in cooperation with the stakeholders and setting the required plans and programs to execute it**, the Commission seeks as per its role to bear its duty efficiently and effectively to realize the national vision that's adopted by all official, private sector and the civil society institutions that participate in implementing it. **The Commission expects that the cross-sectoral strategic planning process to contribute to realizing a set of goals, including but not limited to:**

- Bolstering and spreading the principle: **“enhancing integrity shall be relevant to all, and it is the basis of eradicating corruption from the Palestinian society.”** This procedure is going to be materialized through relying on the National Cross-Sectoral Strategy to Bolster Integrity and Combat Corruption 2020-2022 as a **directive reference frame that encourages all** public institutions to recruit its resources to serve it, and direct them toward achieving the end state.
- **Contributing in fulfilling the commitments of the high political will** on not tolerating the corrupted, especially the directions of the President of the State of Palestine, National Policy Agenda “Putting Citizens First” and meeting the international conventions and the relevant SDGs.
- Adopting the strategy as an **accountability method to hold all concerning institutions accountable** in terms of enhancing integrity and combating corruption, including the Commission, the institutions of oversight, law enforcement, the civil society and the private sector. Moreover, accountability shall be based on the mutually-agreed-upon indicators and standards between the partners.
- Mobilizing and recruiting the **support of the neighboring Arab countries and the international community** and provide the TA and financial aid required to have the desired results materialized.
- **Framing and unifying the efforts set forth to combat corruption and to enhance integrity; in which it will result to concentrate these efforts, away from fragmentation or duplication** in terms of the relevant interventions through agreeing on a group of prioritized interventions, and through identifying the responsibilities.

## **1.2. Preparing the Strategy in an effective and interactive methodology**

The process of the cross-sectoral strategic planning relied on a series of activities. Those activities allowed all partners varied from public and private sectors, the civil society and the international institutions to participate in analyzing the situation and to set the priorities for different sectors through discussions, exchanging ideas and to find a common ground among them; benefiting their shared vision of “combating corruption”.

The strategic planning process supervision has been assigned to the GPC for planning and setting policies in the Commission. The GPC, in turn, recruited internal human resources from the Commission external to supervise the discussion activities on setting priorities and preparing the strategy draft. The oversight committee provided the Commission with the support in preparing the strategy, and it **implemented the following activities:**

1. The process of strategic planning started in a comprehensive review for a set of referential documents and reports. Some of the aforesaid documents and reports are the Anti-Corruption Law, the National Policy Agenda “Putting Citizens First”, the UNCAC and the available statistics in the Commission based upon the approved records, reports and studies conducted by official and specialized civil society institutions, especially the Palestinian Central Bureau of Statistics. Moreover, the documents, studies and reports were reviewed by international bodies. The committee that prepared National Cross-Sectoral Strategy to Bolster Integrity and Combat Corruption reviewed number of Arab and international anti-corruption strategies to utilize the best interactive methodologies during preparing the strategy.
2. Conducting in-depth meetings with women’s groups, youth, media professionals, official and civil institutions concerned with enhancing the accountability and anti-corruption system to identify the different sectors priorities and focus areas, whether on the national and the sectoral level, or the represented group.
3. Conducting a preliminary workshop to discuss the priorities, 210 participants represented 100 official and civil institutions in the workshop. It resulted in forming taskforces for the strategy four pillars, and in determining a list of the national priorities in enhancing integrity and combating corruption.
4. Following up with the meetings of the four taskforces, the approved focus areas are; prevention of corruption, community participation, law enforcement and prosecution and international cooperation. The taskforces also consisted of a group of Palestinian experts to support the taskforces in identifying the results and interventions in each focus area.
5. Preparing the first draft report of the National Cross-Sectoral Strategy to Bolster Integrity and Combat Corruption 2020-2022. It included an analysis of the situation, the goals, the cross-sectoral results and the required interventions in each focus area. It aimed to establish the framework of extensive consultations with all national and international partners.
6. Discussing all four pillars with the partners, among which **a regional workshop was held in Amman** during the period from 19- 21<sup>st</sup> of October 2019, in cooperation with the Commission and the UNDP. A group of national and international experts participated in the said workshop, in addition to representatives from the civil society

The periodical evaluation reports of the previous strategies, and the reports of the subjective assessment of the UNCAC and the report of the State of Palestine on its level of compliance with achieving Goal 16 of the SDGs 2030 are part of the referential documents that were relied on in analyzing the context.

sector in Palestine and Jordan. The workshop's recommendations and remarks are included in the strategy.

7. **A national closing workshop was held** on November 28. 2019 to adopt the Strategy, in the presence of all partners from different sectors that represent the Palestinian society; the Public, Private, and Civil Society Institutions. The Strategy was completely presented, and the attendees discussed all its parts.
8. Based upon the recommendations and remarks of the workshop that were a representation of all sectors participation, the final draft of the national cross-sectoral strategy for Integrity and Anti-Corruption (2020-2022).

### 1.3. Contents of the Strategy's Report.

The strategy's report consists of four sections. **The first section** is the methodology through which we presented the goals (objectives) of the cross-sectoral strategic planning process, and the activities of preparing the strategy. **The second section** presents "Background" on the Palestinian social, economic and political contexts. That tackles the demographic situation for the Palestinian society, the indicators of poverty, work, health and education, in addition to the components of governance and politics. It showcased combating corruption justifications and goals (objectives) from a developmental and economic perspective. Besides, it presented a description of the core references of the cross-sectoral planning process "the UNCAC, SDGs 2030, the National Policy Agenda 2022 and the Palestinian Anti-Corruption Law No. (1) of 2005 and its amendments."

**The third section** of the strategy presents an analysis of the special situation of the integrity and anti-corruption system. It rolls out the main push factors, and the pull factors for the national efforts that aimed at building the integrity and anti-corruption system. Additionally it shows the main reasons that contribute to weaken the integrity system, and contribute to the prevalence of corruption within the Palestinian society. At the end of this section the relevant parties in implementing the cross-sectoral strategy shall be identified with an explanation of their assigned roles in implementing it. In the same vein, it sheds the light on the main accomplishments of the governmental institution and the relevant civil society institutions.

**The fourth section** of the strategy presents our aspirations and the general directions on the longer term "the national vision" and a description of the desired change, and the intended workload from all relevant parties in implementing the strategy.

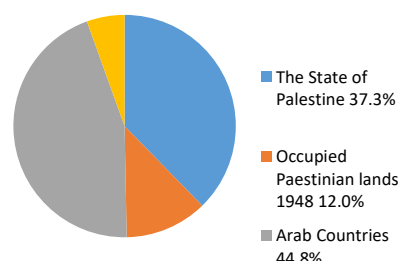
**The fifth section** presents the implementation measures and the follow-up policies, evaluation, and the performance indicators.



## Section II, Background: The limitations and concepts related to the system of integrity and anti-corruption

### 2.1. General Context of the Palestinian Society

Palestine is part of the Arab World; the Palestinian people are part of the Arab nation, and the Palestinian governance system is parliamentary democratic. This governance system enables the multiparty political pluralism, through which the President of the Palestinian Authority is directly elected by the people, and the government is held accountable before the President and the Judicial Council. The principle of the rule of law is the basis of the governance system in Palestine, which all authorities, bodies, commissions, institutions and persons are equally subject to, regardless of their ethnicity, gender, color, religion, political opinion or disability.<sup>1</sup>



Palestine has a population of 13,050,268, 4,915,349 of whom are residents of Palestine (2,953,943 in the northern governorates, and 1,961,406 in the southern ones). The Palestinian society is generally described as a youthful society. The percentage of the Palestinian citizens who are under 15 reached **38.5%**, according to the PCBS statistics at the end of 2018. The percentage of the young people (aging 18-29 year-old) in Palestine is around **23%**, **equal to 1.13 million young men and women. The percentage of the Palestinian families, that their breadwinners are among young people reached 15%.** The average family size is 5.1 (4.8 in the WB, and 5.6 in the GS). The average life expectancy is 72.7 years among men, and is 75 among women. The statistics shows a growing role of women in supporting their families, the percentage of families with female breadwinners in the Palestinian society reached 10.0% in 2017 (10.4% in the WB, and 9.4% in the GS).

The GDP of 2017 (at constant prices) reached USD 13,686.4 million, 10,715.9 million in the northern governorates, and 2,970.4 million in the southern ones. The average per capita of the GDP (in USD) in the same year (at constant prices) reached USD 3,072.4 (USD 4,154.2 in the northern governorates, and USD 1,582.2 in the southern ones)<sup>2</sup>. By the end of 2018, the total debt value on Palestine reached USD 2,370 million-around 16% of the GDP in 2018. The total value of the bank



<sup>1</sup> The Palestinian Basic Law

<sup>2</sup> PCBS, 2019. Palestine in numbers 2018. Ramallah-Palestine.

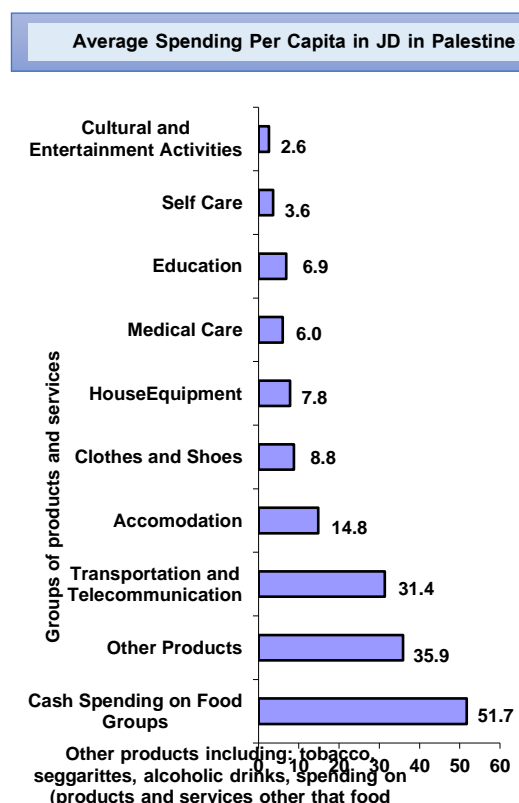
deposits in 2018 reached USD 12,227 million, 71% of the total deposits are the deposits of the residents in Palestine<sup>3</sup>.

The value of the running and capital expenditures of the government reached USD 4,643.5 million, including USD 4,370.1 million of the running expenses, and USD 273.4 million of the capital expenses. However, the total central government expenses reached USD 4,190.1 million – around 46.6% is for workers compensations, 25.7% is for social benefits while utilizing the services and products is 19.8%, and the rest was spent on other items. As for the local government, represented by the municipalities, village councils and project committees, their expenses reached USD 458.2 million during 2018. The government revenues reached USD 4,453.2 million in 2018 (90.8% revenues of the central government and 9.2% revenues of the local government). Moreover, the percentage of the foreign grants and aids reached 15% of the total government revenues<sup>4</sup>.

The average monthly cash expenditure per family reached JD 934.9 in 2017 (JD 1,143.6 in the WB, and JD 556 in the GS). The percentage of expenditure on food reached 30%, the cash expenditure on items excluding food reached 55%, the percentage of the cash expenditure on the paid cash transfers, taxes, and non-consumption expenses reached 15%. The poverty rate among people according to the monthly consumption patterns in Palestine for 2017 reached 29.2% (14.9 in the WB, and 53% in the GS). However, the extreme poverty rate reached 16.8% (5.8% in the WB, and 33.8% in the GS)<sup>5</sup>

31.1% of the Palestinian families or one of their members they received aid during 2018, i.e. 9.7% of the families in the WB, and 68.6% in the GS<sup>6</sup>. The families pointed out that 38.4% of the aids received by the families in Palestine in 2018 were food aids, followed by 26.2% as technical assistance. The families also noted that 35.0% of the aids received, were from the UNRWA. The Ministry of the Social Development is the second source of aids at 24.5%.

The literacy rates among men (15 year-old and above) in 2017 reached 98.3, and 95% among women. The percentage of Palestinians who graduated from the secondary school reached 23.4%, whereas those finishing their undergraduate studies or post-graduate studies reached 17.3%. The number of government teachers in schools year for 2017-2018 reached 39026, 58.1% of them were females. The number of



<sup>3</sup> PCBS, 2019. The Palestinian Economic Performance 2018. Ramallah-Palestine.

<sup>4</sup> PCBS and the Ministry of Finance and Planning, the Press release of the finance of the public government, 2018. Ramallah-Palestine.

<sup>5</sup> PCBS, 2019. Palestine in numbers 2018. Ramallah-Palestine.

<sup>6</sup> PCBS, 2019. Survey on monitoring the social and economic conditions, 2018 – the main results, Ramallah-Palestine.



students enrolled in universities, institutes and colleges of the same year was 211.3 thousand students.

The workforce survey results in 2018 showed that the percentage of the workforce participating in Palestine among persons who are above 15 year-old in 2018 reached 46.4%. The results also showed that the participation rate among males in the workforce among all males within the employment age is 71.5%, and 20.7%<sup>7</sup> among females. The results presented the percentages of the participating workforce on the regional level in 2018. The results showed that the percentage of the participating workforce in the WB reached 46.1% of the total population aging 15 years and above– 73.7% among males, and 17.6% among females. The percentage of the participating workforce in the GS reached 46.9% -67.8% among males, and 25.7% among females. The unemployment rate among people aging 15 years and above in Palestine reached 30.8% -25.0% among males, and 51.2% among females).

The percentage of people with health insurance in Palestine in 2017 reached 79%; the statistics showed also that 6% of the population faces at least one difficulty with the evidently increasing movement difficulties (3%). The number of Palestinian families with at least one mobile phone reached 96%, and the percentage of people aging 18 and above with a mobile phone or a Smartphone reached 89%. Moreover, 65% of the Palestinian households has internet subscriptions, while the percentage of the internet users aging 18 and above anywhere in Palestine reached 64% -59% in the WB, and 57% in the GS<sup>8</sup>.

There are 16 administrative units (governorates) in Palestine, 11 of which are in the WB (Jerusalem, Bethlehem, Hebron, Ramallah and al-Bireh, Nablus, Salfit, Qalqilya, Tulkarm, Jenin, Jericho and the valleys and Tubas) and 5 in the GS (North of Gaza, Gaza, Deir al-Balah, Khan Yunis, Rafah). The number of local bodies in 2015 reached 407.

Israel still occupies the WB and forces a siege on the GS; it keeps the segregation on Jerusalem from the WB. Along with its ongoing policies in confiscating the lands, it expands the settlements and controls the borders and the natural resources, especially water in what's so called Area C, Israel controls the customs and clearance revenues, water and energy of the population in the WB and the GS.

The unending Israeli occupation policies and its growing expansion had an impact on the institutions in the State of Palestine, causing its general performance to weaken and deteriorate. These policies were demonstrated when Israel hijacked and took over the Palestinian clearance revenues. This measure impacted directly and negatively the capacity of the institutions in the State of Palestine on all levels and fields. Particularly, the service providing institutions as they are unable to pay full salaries for their employees. The foremost of the aforementioned employees were among the health and the education sectors.

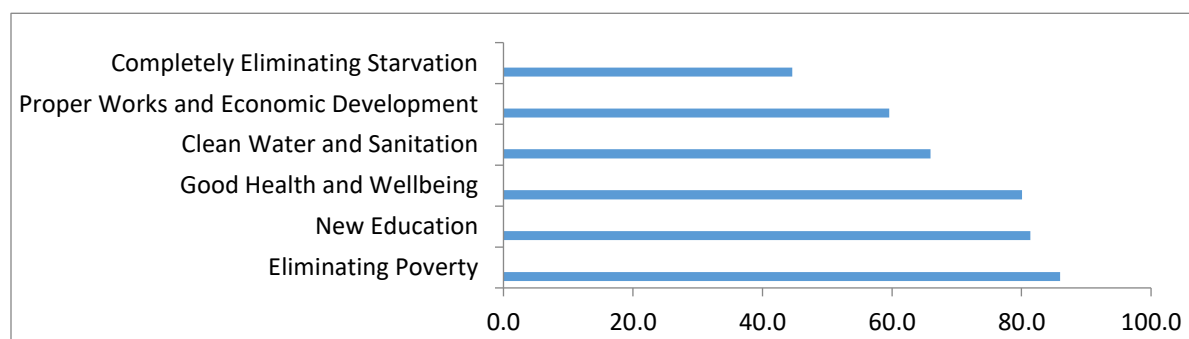
By the same token, the USA is absolutely biased to the Israeli amplified policies and greed through taking over the lands and building settlements. The American Administration's

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<sup>7</sup> PCBS, Workforce survey, 2018

<sup>8</sup> A report issued on 11/7/2019 by the PCBS that showcases the population conditions in Palestine on World Population Day.

announcement to move the American embassy to Jerusalem is a stark violation of all the international principles, resolutions and documents, including its decision to stop the aid to the Palestinians. All of these measures, including other biased attitudes and resolutions, formed such negative impacts on the institutions of the State, weakening them and fragmenting all efforts set forth for reform, and to achieve a national system that enables integrity and combats corruption.



The first SDG for 2030 is to eliminate poverty is considered the first one to be achieved among the Palestinians aging 18 and above of the first six SDGs for 2030 with percentage of 86% of people. Education also was second place with 81% of people. The third SDG relates to good health and the welfare of people; with 80% of people aging 18 and above in Palestine considered health as a priority<sup>9</sup>.

The tasks and responsibilities of oversight and organizing the Palestinian economic, social, political and civil issues and affairs are assigned to a set of ministries and official governmental institutions, and PLO institutions, cooperates, other non-governmental institutions, civil society institutions, UNRWA and syndicates. A group of the oversight institutions, headed by the Palestinian presidency, the Legislative Council, the Judiciary and the SAACB performing their tasks on the institutions that run the public affairs through a series of oversight and accountability instruments.

<sup>9</sup> PCBS, 2019, survey of the civilians tendencies about the national priorities in the frame of sustainable development agenda, 2019. Ramallah – Palestine.

## 2.2. Eradication of corruption is a necessity to achieve development and welfare

“Corruption is a plague that has wide-ranging and corrosive ramifications on societies. It undermines democracy and the rule of law and leads to violations of human rights, distorted markets, eroded the quality of life and allowed organized crime, terrorism and other threats to human security to flourish. The evil phenomenon is found in all countries — big and small, rich and poor — but it is in developing countries that its effects were most destructive. Corruption hurts the poor disproportionately, by diverting funds intended for development, undermining a government’s ability to provide basic services, feeding inequality and injustice, and discouraging foreign investment and aid<sup>10</sup>.”

**“... With the proliferation of corruption, you cannot build a factory, or a business, so you cannot perform your work. We decided, therefore, on the necessity of combating corruption” President of the State of Palestine, December 8<sup>th</sup>, 2018.**

Corruption is an international issue with complex causes and origins. It threatens all SDGs, especially poverty, starvation and developing service providing concerning health, education, energy, clean water, providing proper accommodations, environment protection, realizing gender equality and protecting all minorities. Therefore, the State was called for preparing and approving on the UNCAC, which is the only international instrument on this subject matter. The State realized the impacts of corruption including:

- Weakening the State’s resources; impacting the quality of services provided to citizens, and leading it to indebtedness and underperformance. Especially, this case could lead to undermine providing citizens with security, dignity and protection over their properties. This situation may decrease the contribution of the State to realizing all the SDGs.
- Spreading the negative values in the society that leads to weaken its cohesion, and threaten its moral values that was initially established to protect its humanity and statehood.
- Spreading crimes, especially the organized and the economic ones, i.e. money laundering, terrorism financing, monopoly and hegemony.
- Weakening the pillars of the democratic system in the State, especially those responsible for ensuring the rule of law like the Judiciary, the Parliament and the Public Prosecution.
- Undermining the state’s efforts aiming to encourage the investments in the national economy given that the local and international venture capitalist investors consistently seek a secure and safe environment to invest their capital.
- Weakening the economic institutions and eliminating the initiatives, innovativeness and competitiveness, particularly for the emerging economic enterprises led by young people, given they find it difficult to compete with the corrupted in the society.

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<sup>10</sup> From the Welcoming the adoption of the convention, Secretary-General Kofi Annan.

### 2.3. Main pillars for combating corruption

The focal point of the National Cross-Sectoral Strategy for Integrity and Anti-Corruption 2020-2022 (**Citizenship – Empowerment -Reform**) is a set of international and national pillars. The said pillars established a general framework for a national vision in combating corruption, and it defined the levers of the change and interventions required to achieve the desired results.

**The United Nations Convention against Corruption (UNCAC):** the UNCAC stresses combating and eliminating corruption as not only an individual responsibility but a collective one that is also the responsibility of the State. This pillar may not be achieved, unless all the state's parties' efforts collaborated including the public and private sectors, non-governmental organizations and civil and local society institutions. The UNCAC is an internationally binding instrument that all countries shall comply with its binding regulations, and they may comply with the voluntary or optional rules.

The UNCAC consists of eight chapters, four of which include the basic regulations in combating corruption, and the other four are related to the general regulations, the TA, the mechanisms of implementation and the final provisions. The core chapters also contain the relevant materials to the preventive measures, criminalization, international cooperation, and assets recovery.

As for **the preventive measures**, the regulations of the UNCAC consist of the policies and preventive measures that combat corruption in the society like the employment policies in the public sector, establishing preventive bodies to combat corruption, circulating the code of conduct in the public sector and enhancing transparency during elections campaigns and political parties. The UNCAC also requires the states to set preventive measures to enhance transparency and accountability within the general administration issues, determining the preventive requirements and conditions, especially within the crucially significant aspects of the public sector like the Judiciary, public procurements, managing the public finances. The preventive measures also include a series of the specialized measures that revolve around the independence of the judiciary and the Public Prosecution. Moreover, they include combating corruption in the private sector and ensuring the policies that guarantee the social participation in the efforts put forward to combat corruption.

**The chapter of criminalization and law enforcement** included a number of articles that cover a wide range of types of corruption, the different methods of trial and deterrence against it. Some types of corruption are the bribery of public officials, national and foreign ones, the officials of the international institutions, embezzlement, misappropriation and diversion of property, trading in influence, abusing positions, concealing and laundering the proceeds of corruption and the crimes of supporting corruption including money laundering, and the obstruction of justice. This chapter also addressed the significance of protecting the whistleblowers in exposing suspicions of corruption, witnesses, victims and experts.

The fourth chapter included a set of **provisions of the international cooperation** that aims at enhancing the cooperation between countries in criminal issues. The said countries are to ensure that their laws allow for this cooperation to take place. This chapter also includes

contents about extradition, and transfer of sentenced persons, mutual legal assistance, law enforcement cooperation, joint investigations and special investigative techniques. This chapter also addressed the required measures that support tracing, freezing, seizure and confiscation of the proceeds of corruption.

Given its significance, the fifth chapter focuses on **asset recovery**, especially the poor countries that are dependent on the international aids to achieve their development goals, and the countries plagued by corruption crimes. This chapter, therefore, includes the core regulations that determine the measures and mechanisms of cooperation to recover assets, while maintaining the flexibility of the recovery measure that may be justified provided specific conditions. These regulations may support the efforts of the countries set forth to handle the influence corruption through sending the officials a letter about committing corruption offenses, that there shall not be a hiding place for illegal assets with the international cooperation that is based on recovering assets of corruption.

On April 2<sup>nd</sup>, 2014, Palestine acceded the UNCAC, and it came into force the same year in May. Signing this UNCAC imposes many aspects that this strategy complied with, like making the legislations and measures related to enabling integrity and combating terrorism in conformity with the regulations and items of the UNCAC. Additionally, the strategy complied with the UNCAC in terms of taking the preventive measures to secure the environment of the public institutions from corruption, prevent impunity, enable the international cooperation, prosecution and criminalization and others.

**SDGs 2030:** SDGs 2030 are the main reference for National Cross-Sectoral Strategy for Integrity and Anti-Corruption 2020-2022. They are referential given the contribution of the act of combating corruption to their materialization. Especially, they are important because the strategy is based on the component **SDGs 2030 No. 16 that stipulates “Peace, Justice, and Strong Institutions.”** More specifically, the strategy depends on the recommendations of the national team for Goal 16 that the Palestinian Cabinet formed in 2018.

The strategy seeks to contribute to achieve the purposes of SDG 16 that are related to the integrity and anti-corruption system (16.4, 16.5, 16.6, 16.10) in terms of enhancing the oversight on the performance of the public institutions, managing the public finances, developing the accountability and oversight instruments, prosecuting corruption cases, contributing to preventing impunity, contributing to oversight on the performance, enhancing the independence, neutrality, efficiency and integrity of the cornerstones of justice including the Judiciary, security institutions and official oversight institutions.

The significance of this goal stems from the importance of combating corruption and enhancing integrity, given it intertwines with the rest of the goals. All developmental goals of the SDGs 2030 require the inclusion of combating corruption and enhancing integrity.

**The National Policy Agenda 2017-2022:** It is considered as Palestine’s high policy document, and the primary guide of the Palestinian development plan and its sectoral and cross-sectoral components. The Palestinian government approved in December, 2016 the National Policy Agenda 2017-2022: **Putting Citizens First**. This Agenda was prepared and

issued by the Prime Minister's office, then it was followed by approving the sectoral and cross-sectoral plans that stemmed from it; in cooperation with the governmental institutions, the local government agencies, the representation of some civil society organizations, private sector and the international partners within the field of development. This cooperation bore the fruit of setting 18 sectoral plans, and 3 cross-sectoral ones.

The strategy was based on the policies and priorities of the National Policy Agenda relevant to combating corruption and enhancing integrity and accountability. Especially, the fifth priority stipulates: Effective Government (National Policy 9: Strengthening Accountability and Transparency) and National Policy 10 (Effective, Efficient Public Financial Management). The strategy also relies on the second pillar within the Agenda (Reform and Improving the Public Service Quality), and the National Priority 4 (Citizen-Centered Government), National Policy 7: Responsive Local Government and Reform the Local Governance and Restructure Local Bodies) and National Policy 8 (Improving Services to Citizens).

**The Palestinian Anti-Corruption Law No. (1) of 2005 and its amendments:** The strategy relies mainly on defining corruption as stipulated in Article (1) of the Law which determines types of corruption, and Article (2) that determines those subjects to the provisions of the Law. The later included the Head of the State and his adviser, heads of the institutions subordinate to the Presidency, the Prime Minister, Cabinet members and the like, the Speaker and members of the Legislative Council (PLC), the members of the Judicial Authority and the Public Prosecution, Heads of institutions, entities, civilian and military agencies and members of their boards if existing. Governors, heads and members of local councils and their employees. Public employees appointed by a competent authority to occupy a position falling within the civil or military job formations list on the budget of a government department notwithstanding the nature of that job and members of the diplomatic corps and the alike. The heads and directors of companies and their employees in which the state or any of its institutions are shareholders. Shareholders in non-profit companies and their employees. Arbitrators, experts, receivers, attorneys of creditors and liquidators. Heads and directors of charitable and cooperative societies and national commissions that have independent legal personality and financial and administrative independence, unions, associations, clubs and the like and their employees even if they do not receive support from the general budget. Persons tasked with public service related to work they have to do. Any non-Palestinian person who occupies a position in any of the state's legislative, executive and legal institutions; and any person who occupies a public position for the benefit of any public institutions or national organization subordinate to a foreign country or an organization of international nature. Officers, members and employees of entities in which the government is shareholder or those that receive any support from the general state budget.



## **Section III, Situational Analysis, benefit from experiences and capacities of everyone to address to obstacles and issues**

### **3.1. National accomplishments and expertise in enhancing the integrity and anti-corruption system**

At the beginning of 2010s, the State of Palestine stepped up the efforts to enhance good governance in Palestine through approving a regulative system, building and developing the Palestinian institutions, spreading a social culture that rejects corruption, enhances rule of law and activating the role of the citizen in detecting and whistle-blowing corruption crimes. In the same vein, the Commission along with the institutions of the State of Palestine and the civil society institutions, supported by the President of Palestine and the Prime Ministers and the international community, contributed to achieve a set of accomplishments on the political, law-enforcement and societal participation levels. The most significant out of these were:

- 1. Enactment of the legislations that governed the oversight institutions and bodies and law,** the most significant legislations are the Anti-Corruption Law No. (1) of 2005 and its amendments ,SAACB law 15/2004 and its amendments and the Anti-Money Laundering Law-By-Decree No. (9) of 2007...
- 2. Issuing a set of regulations that includes a definite preventive measures that enhance the governance and combats corruption:** The most important out of these legislations are Law No. 7 of 1998 for Planning the Budget & Financial Affairs and its amendments, and the issued financial regulations under it, Public Procurement Law (Law No. 15 of 2011) which stipulated establishing the first independent body for public procurement, Law-By-Decree No. (9) Of 2010 pertaining Banking, the Amendment of the Anti-Corruption Law No. 1 of 2005 which took place in 2018, and Decree-Law No. (7) of 2013 On the Palestine Deposit Insurance Corporation and all regulations issued under it....
- 3. National Efforts for long and medium-term planning that target reform and development,** the successive governments approved a set of plans and strategies that contributed to the reform of institutions and enhancing the general administration and civil service. For example, the following are part of the said plans and strategies: the Cabinet Resolution no. 173 for 2004; approving on the new general framework of the reform plan in the general administration, civil service, and the reform and development plan (2008-2010) and the National Policy Agenda 2017-2022...
- 4. Following up the complaints and whistle-blowing on corruption suspicions:** The Commissions has received since 2011 until 2018 a total of 3210 complaint and reports, 1133 of which were not within the specialization of the Commission. 395 of which were referred to the Public Prosecution, 171 of which were referred to the Corruption Crimes Court, the later rendered the judgment of 112 of the said complaints and reports, and it issued a judgment of acquittal regarding 23 of them.
- 5. The criminal proceeds sentenced by the Palestinian judiciary until the end of the year that reached** JD 86 million, USD 52 million, ILS 22 million, Dh 9 million, E-GP

227000, in addition to the sentenced fines on those convicted with corruption offences that reached to USD 43 million, JD 431000 and ILS 600000.

6. **Financial disclosure statements**, the Commission received from the assigned parties more than 49000 statements between 2012 and 2018 from governmental institutions and ministries, military officials, members and officials of local bodies and associations...
7. **Social Awareness**, the number of participants in social awareness programs provided by the strategy implementation parties during 2012-2108 was about 145000 direct participants. Additionally, there are many indirect participants in the programs of awareness, media, training, meetings and competitions held by the Commission and the participating parties in implementing the National Strategy to Combat Corruption. Moreover, more than 40 releases were issued and they ranged among surveys, training materials, handouts, awareness bulletins and brochures.
8. **Encouraging the engagement of the civil society**, the last three years witnessed many social initiatives that evidently contributed to the national efforts set forth to combat corruption. The most significant out of these initiatives was forming a group of coalition and networks that constitute of tens of civil society institutions that launched initiatives related to anti-corruption issues on the national level. For example, the Civil Coalition for the Reforming the Judiciary, the Civil Society Team for Enhancing Public Budget Transparency, and the efforts of the civil society institutions set forth to enable the social accountability system in the southern governorates (the GS). Moreover, empowering the youth and the local groups to implement many social initiatives, with holding tens of hearing sessions on accountability that allowed for enhancing the transparency and integrity of some public service institutions like social development and health.
9. **Enhancing the role of media**: the recent years witnessed an evident growing role of the investigative journalism and the media accountability radio programs in stirring up the public opinion about certain topics. The said topics are basically linked to the waste of the public finances and influence peddling to achieve personal interests. In light of a number of these investigations; research, investigations and examinations started on a number of the said cases.
10. **Engaging schools and universities in raising the awareness**, by 2019, 10 Palestinian universities adopted two courses; anti-corruption and integrity course prepared by the Coalition for Accountability and Integrity (AMAN), and a governance course prepared by Palestine Capital Market Authority.

### **3.2. Factors that enabled the national efforts ability to enhance integrity and combat corruption**

Social, economic, political, legal, technological and environmental factors contribute to foster the national efforts set forth to have a safe society away from corruption, and an active society in eliminating it. The ultimate goal is to have a corruption-free Palestinian society. The main factors are the following:

1. **High Political Will**: the President of Palestine and the Prime Minister have the topic of combating corruption and creating an environment of integrity on their schedules

and the schedules of their subordinates. Whether it was through the enactment of legislations that enable integrity and combat corruption in the Palestinian society, or through allocating the human and financial resources and taking the required institutional measures to achieve the desired goals. The political will was also represented in inclusiveness of the National Agenda, which is a high political document, a set of policies and interventions related to enable the system of integrity and combating corruption. Additionally, it takes a set of decisions related to activating the code of conduct in the public service, security services, initiating discussions to enact laws, especially developing a ratifying legislation for the right to access to information and the protection of whistleblowers and witnesses. The political will was also reflected in the growing number of the public institutions that showed their readiness to commit to the pillars of transparency. The said institutions also showed improvement in the measures of post occupancy of public services.

2. **A set of Palestinian regulations that enable law enforcement:** ensuring that there is no impunity and guaranteeing the accountability of the corrupt officials, Palestine adopted a set of laws and regulations, the foremost out of these are the Anti-corruption Law and Anti-Money Laundering and Terrorism Financing Law-By-Decree.
3. **The Palestinian citizens are aware, well-informed, brave and united.** Women and girls, along with men and boys in all governorates are still writing the heroic stories of resilience against the Israeli occupation policies that aim at controlling the land and natural resources, especially in Jerusalem and what's so called Area C. The long Palestinian resilience enhanced the social values like courage, consolidation and political awareness. These values are the sine qua non for enabling integrity and combating corruption. Many such lofty values were materialized within the society during the crises, where citizens would with all their material and moral means volunteer and consolidate to support the seized and harmed areas, and to support the obstructed institutions. The political culture and education the Palestinian citizens have acquired, along with their engagement in the public life contribute to mobilizing the society to report on corruption suspicions, and to hold the local and central institutions accountable.
4. **Active oversight institutions in different sectors:** a group of oversight institutions is active in contributing to issuing the annual and semi-annual reports about the performance of the concerned institutions that fall under its framework. The primary of these institutions is the SAACB that has published three special reports in 2018, along with its annual report. The SAACB aims through the said reports to inform the general public about the information to ensure the social accountability through holding institutions accountable. Some institutions and commissions also published a set of reports, like the Water Sector Regulatory Council, the Palestinian Pension Commission, the Palestinian Anti-Corruption Commission, Palestine Investment Fund, the Central Elections Commission and the Supreme Judgment Department.
5. **The diversity and spread of the civil society institutions,** a number of the civil society institutions contribute to managing the public affairs. These institutions are

known with their outsized popular networks, and with their ability to influence their members and society on many fields. Some of these institutions are syndicates, hospitals, universities, civil society institutions, human rights institutions, agricultural institutions, chambers of commerce, representative institutions of the private sector, youth clubs, women institutions and charitable institutions. This variety and wide-spread of the civil society institutions contributed in raising the awareness, enabling the social engagement and mobilizing people especially young people and women. They also contributed to enable the social accountability instruments on the local and national levels, and to mobilize the required resources on the local and central levels.

6. **The media independence and freedom, the diversity of information tools.** The Palestinian society witnesses an active group of media; radio, televised or printed media. Some of which are part of the public sector, other are private one, and the rest are civil society institutions. The intellectual and administrative diversity among Palestinian media allows for presenting different issues to the general public. The aim is to enable social accountability, and to shed the light on any gap in the policies or procedures that might form a gateway for corruption. Series of investigative reports and radio and televised programs contributed in the recent years to highlight some of the public affairs issues. The said reports and programs were controversial and they stirred up the discussions among officials, citizens, and civil society institutions.
7. **The wide-spread of social media and the internet.** Most Palestinian families use the internet and the social media in most of the social, political and economic matters. This situation stemmed from the spread of technology and its reach to all residential areas. Additionally, it stemmed from people's literacy. The social media contributed to support many issues of the public affairs that support some groups or calls for their rights, or shed the light on some social issues linked to the public service. The wide-spread of social media contributed to activating the social participation, and in raising the awareness about the causes, risks and impacts of corruption. It also helps enable the initiatives about the social accountability, and about reporting on corruption suspicions.
8. **International orientations to protect the environment and human rights.** There is an evident growth in the international orientations and the international human rights institutions that ask for protecting the environment and the international resources. This call takes place through the international documents and conventions, and through the SDGs 2030. The international orientations help protect the environment and human rights by pressuring on Israel to stop stealing the natural resources, taking over them and preventing the Palestinians from utilizing them to achieve their development goals.
9. **Using information technology in different Sectors.** There is a growing orientation in the Palestinian institutions to automation, and to utilization of information technology and digitization. This matter in turn helps provide and exchange information, it improves the investigation and follow-up tools, and it enables transparency.

10. **International orientations to support, reform and capacity-building.** Many governments, international institutions and UN organizations contribute to provide the technical and financial support to reform and build the readiness of the institutions, and enable them to provide the services efficiently and effectively and in line with the best governance practices.

### **3.3. Obstacles facing the national efforts aiming at enhancing the anti-corruption and integrity system**

Some social, economic, political, legal, technological and environmental factors contribute to creating a proper environment for weak-minded individuals to practice corrupt acts, and to enjoy impunity. This situation in turn limits the ability to achieve the desired results on the level of enabling the anti-corruption and integrity system in the society. The most significant out of these factors are:

1. **Military Israeli occupation on most of the Palestinian lands** and its ongoing full hegemony on what's so called Area C. Additionally, it uses aggressive policies in the WB and Jerusalem, and it divides them based on the canton system, separating each with the occupation checkpoints on the gateways of the Palestinian cities and villages. The Israeli military aggression along with the recurrent wars on the southern governorates, the Israeli occupation authorities forces the full hegemony on the checkpoints and gateways. These issues together left a negative impact on the efficiency of the national efforts set forth to enable integrity and transparency in Palestine. Accordingly, the weakened State's capacity in having power and authority over its lands led to undermining the efforts of the law-enforcement institutions and limits their ability from reaching some areas and to prosecute the corrupt persons.
2. **The absence of the legal authority in the southern governorates.** This matter led to terminating the mandate of the Judicial Council and its dissolution, which is the official instrument in accountability and oversight over the public institutions. This situation also reflected on the disruption of the general elections, which is the first social accountability instrument. This situation resulted in disrupting the role of some oversight institutions in the southern governorates, especially SAACB and the Commission. Moreover, the institutions, ministries and official commissions were not able to take their role in the southern governorates independently and professionally.
3. **Palestine did not get a full membership.** This matter limited its ability from prosecuting the corrupt persons, and from recovering assets from those escaping from the justice to other countries.
4. **The incompleteness of the legislative system related to enhance anti-corruption and integrity system,** especially those relating to some regulations that contribute to enable the preventive measures like the Right to Access to Information Law.
5. **The decline in the international aid provided to Palestine and the political conditions forced on most of them.** The value of the international support to the general budget declined to USD 612 million in 2016, and it reached USD 532 million in 2017. However, it reduced to reach USD 504 million in 2018. The data provided to the Ministry of Finance shows that the value of this support reached to USD 418

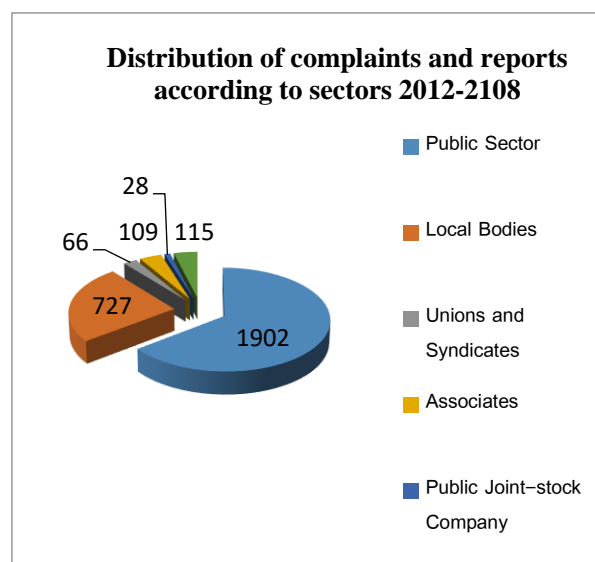
million until the end of the third quarter of 2019. This situation was an evident indicator of the orientations of the donor countries and the international society to reduce their support to the State of Palestine. Especially, the averages of the international support in the last decade, prior to 2016, exceeded a billion USD. However, it does not respond well to the challenges facing the government, nor does it fulfill the needs of the citizens. Achieving its designated goals, the budget's allocations to combat corruption within the general budget shall fulfill the needs and requirements of implementing the strategic plans as ensured in the programs, projects and activities, which is an essential. Therefore, reducing the international aid and support to the State's budget negatively impacted the programs, effort and activities of the Commission in combating corruption and enabling integrity.

6. **The general perception of the general public indicates to the expansion and spread of the phenomenon of corruption.** This was the case in all the official, civil society and private sector institutions, though it remains a general perception that the studies and surveys refer to the actual measurement indicators lack. However, it negatively influences the trust of the citizens in the State's institutions, which in turn undermines their contribution as a main partner in the efforts set forth to combat corruption. Simultaneously, it develops their ability in contributing to some types of corruption, by the tendency of some to make use of corrupt acts like favoritism and nepotism.
7. **The increase of the unemployment average, especially among the graduate young people, and the increasing poverty rates especially in the southern governorates.** This situation concentrates the priorities of the citizens on providing the basic needs instead of focusing on the quality of the services, or tendency to using favoritism and nepotism to attain certain jobs of human aids. This matter fosters the possibility of further spreading the political corruption, i.e. joining the political parties only to ease their access to certain aids or job positions.
8. **The weakness of the national oversight instruments on the aids and grants.** Many commissions, governments and international organizations are active in the fields of development and relief for Palestinians in the southern and northern governorates including Jerusalem without fully coordinating with the Palestinian official institutions. Mostly, these institutions coordinate with the institutions and commissions regarding the organizational with unofficial parties, whether with the Israeli occupation authorities, or with the illegal authorities in the southern governorates.
9. **The increasing tribal, regional and partisan tendencies.** This matter contributes to tolerate some types of corruption considering them socially acceptable, especially with favoritism and nepotism.
10. **Depending on Israel in providing some basic services** like water, electricity and some basic products. Provided that Israel and is unaccountable, and its policies are not transparent regarding of the quality or price.



### 3.2. The basic issues regarding the anti-corruption and integrity system

Some of the social, political and legal factors along with the weakness of the integrity system in the Palestinian society contribute to the impunity of some of the corrupted, as well as to spread of some types of corruption. The available data on the number of filed complaints to the Commission indicates that **favoritism and nepotism and the breach of trusts, misuse of office and exploitation of office are the most common types of corruption** in the Palestinian society. The public sector, is the most sector the complaints were against followed by Local Bodies sector is the sector, then the unions and syndicates. The following set of main issues, along with the core reasons linked to the Palestinian institutional, organizational and social structures contribute to undermine the integrity and anti-corruption system in Palestine:



#### **The first issue: The incompleteness of the Palestinian legislative system weakens the preventive and the criminalization measures of corrupt people:**

Despite the State of Palestine approved on a set of laws and regulations related to enhance the preventive measures and prosecuting the corrupt people, mainly the Anti-Corruption Law, there are still shortcomings and deficiencies in some of these regulations. Given that combating corruption is still new to the international, Arab and regional arena, and that there is a lack of experience on the national and Arab levels, Anti-corruption Law still lacks some articles that shall support in enforcing it. For example, the Law requires amendments that allows confiscating criminal proceeds, criminalizing all kinds and types of corruption, intensifying the penalties, activating the mechanisms of reporting and enabling the Commission.

The lack of the current regulations contributes to weaken the integrity, transparency and anti-corruption system. Therefore, refraining from issuing the right to access to information law limits the transparency in all sectors, and limits the ability of media officials, public-opinion makers and the social initiatives from holding the officials accountable in all sectors. Moreover, refraining from implementing a regulation to protect the witnesses and reporters undermines the engagement of citizens in reporting on the corruption suspicions.

The weak legislations that govern some public institutions, or their inexistence altogether, especially the legislations related to governance, oversight and management, weakens protecting these institutions from corruption, and undermines the ability of monitoring their performances. For example, the security sector falls under this category. Therefore, refraining from issuing implementation regulations and bylaws related to the laws regulating

the security sector impairs the immunity of the security institutions against corruption. The following are examples on the said regulations: PASF Service Law, General Intelligence Law, Law-By-Decree for Preventive Security, Law-By-Decree for Civil Police and the Law-By-Decree for Judiciary Commission in PASF. Moreover, the integrity and anti-corruption environment within the private sector, especially in the public companies that contribute to provide services to the Palestinian society is still weak. This situation stems from a set of reasons; among which are: the legislative system for combating corruption does not include criminalization articles for bribery and embezzlement in the private sector, excluding the companies that the State contributes to, or to any of its institutions. Additionally, many regulations are still absent, which create a legislative void, that reflects on the environment of integrity, transparency and accountability in private sector. The following are examples of these laws: Competition Promotion and Prevention of Monopoly Law, law on the granting of public privileges for the administration and operation of vital service facilities that were privatized and operated, Debt Arrangement Act and the amended Corporations Law.

In addition to the aforementioned deficiencies, the non-extension of State authority over the southern governorates caused the Commission not to take its role in the GS, especially in the aspects related to prosecution, criminalization, and implementation of The Anti-Corruption Law in the southern governorates.

There are a set of organizational, political and institutional factors contribute to the incompleteness of the legislative system, whether those contributing to protect the institutions and the citizens from corruption, or prosecuting the corrupt persons, and prevent them from impunity. These causes can be summarized in the following:

- The diversity in the relevant legislative system in term of sectors, specializations or number of interested institutions in each regulation. These regulations include all interested sectors in achieving sustainable development and in the livelihood of people, including the specialized regulations in combating corruption (cross-sectoral regulations).
- The recency of the local, regional and international experience and expertise in this field, which imposes constant amendments to the Palestinian regulations based on the learned lessons and the constant learning in the field of enhancing integrity and anti-corruption system.
- The limited availability of the studies and research that show the causes and impacts of the legislative system based on the evidence and arguments, also based on the Arab, regional and international experiences.
- The lack of the human resources and the organizational structures specialized in reviewing the regulations of the relevant institutions, especially in commissions and the oversight institutions.

## **The second issue: The limitedness of the social engagement in the efforts of combating corruption**

Despite the multiplicity of the active parties in enabling the citizen's engagement in the totality of the political, social and economic matters, the participation of men and women, young men and women, workers and all relevant groups to enable accountability, reporting on corruption and protecting the public institutions from corruption is still limited. It is the case in the northern and southern governorates; especially the culture of citizens reporting on corruption is still weak. This situation stemmed from a set of causes and challenges, including which is the inactivation of the special regulation of providing protection for the whistleblowers and witnesses, and the lack of trust of the citizen in the efforts, seriousness and independence of law-enforcement institutions in general.

The Palestinian experience in associating the impact of corruption with human rights and the services provided to, is still relatively recent. This situation requires more knowledge-generation and experience-building. There is also a lack in diagnosing the influence of corruption on women, and the ways to limit it. This issue requires including sexual harassment in work environments among the types of corruption that are criminalized by the Anti-Corruption Law, along with enabling the culture of whistle-blowing and encouraging women to report on the corrupt acts against them, and raise their awareness about the integrity and anti-corruption system.

The reasons of the undermined social role in protecting the institutions and prevent corrupt people from impunity are rooted in organizational aspects of the official, civil society and educational institutions, in addition to the role of the religious institution and some regulations. The said reasons are summarized as follows:

- The lack of knowledge among women, men and young people about the significance of combating corruption and its impact on their welfare, dignity and achieving the supreme national goals, especially get rid of the occupation and monopoly. It will also contribute to the achievement of justice to all bar none.
- The limitedness of the public-opinion makers in mobilizing the attitudes that bolster the social values, especially the media institutions, universities, religious leaders and researchers.
- The limitedness of including the curricula and the extracurricular activities in schools to special materials that highlight the values and pillars of transparency, integrity and accountability.
- The limitedness of the engagement of civil society organizations and the social leaderships in raising the awareness and accountability, especially the women, youth and social organizations, and syndicates regardless of their specializations.
- The lack of trust among the citizens, media activists in the public institutions, especially the civil society organizations.

**The third issue: the weakness of the public institutions' organizational capacities impairs their immunity against corruption and diminish their performance.**

Despite adopting the State of Palestine, the long and medium-term planning methodology in the National Policy Agenda and the sectoral and cross-sectoral plans, along with joining to the rest of the countries that approved the SDGs 2030, the role of the institutions and their capacities still fell short of the level required.

The studies and reports show a weakness of the public institutions' organizational capacities reflected on the integrity of a set of active public institutions, especially the service providing institutions such as local commissions, the public finance management institutions, and sectors of energy, electricity, education and health.

The following reasons overlap in the vulnerability of public affairs institutions and their weak role in setting forth their effort to combat corruption:

- The absence of supporting policies that apply the pillars of transparency, and those binding to adopt the values of integrity and accountability.
- The lack of the role of the relevant oversight bodies, such as internal monitoring units, auditing and financial inspections units.
- The limitedness of the social and media roles in holding the service providers accountable.
- The inexistence of the follow-up and evaluation systems within the sectoral institutions and ministries plans, in addition to the weak information systems about the performance of the institution.
- The lack of awareness and knowledge regarding certain aspects of the integrity and anti-corruption system and penalties.
- The inefficiency of the follow-up mechanisms of complaint and the lack of the follow-up and evaluation on the compliance level with the codes of conduct.
- The incompleteness of some governing regulations of the roles of a number of institutions in various sectors.

**The fourth issue: The weak institutional and organizational structure of the pillars of the justice and institutional oversight sector**

The legislative and institutional system assigned the responsibility of monitoring the public performance and finances, achieving justice and combating corruption to a group of institutions, commissions and departments. The work of the said bodies is regulated by the constitution, the laws, the bylaws and regulations. The PLC is the foremost oversight institution given it is the main monitoring and accountability instrument in Palestine, along with its responsibility of law-making. However, in light of the exceptional conditions in Palestine and the dissolution of the PLC in 2018, after it was inactive for 12 years, the Palestinian President took the responsibility of issuing the Laws-By-Decree on behalf of the

PLC since 2007 according to Article (43) of the amended Basic Law. However, the absence of the PLC weakens the oversight role on the public performance and finance.

The President and the PLC support monitoring the public performance and finance as well as the effort to combat corruption, a group of oversight institutions headed by the Commission and the Judicial Authority, the public prosecution, SAACB and the internal monitoring units and audit units and financial inspections in ministries and institutions.

Many political, economic and social factors contributed to weaken the efficiency of the Palestinian institutions in general, and the oversight institutions and anti-corruption institutions in specific. The most significant out of these factors are:

- The incompleteness of the regulations system that ensures criminalization and penalizing the corrupt persons.
- The insufficient capabilities and developmental budgets, the governmental austerity policies and the extent to which it influences the developmental plans.
- The insufficient qualified cadres.
- The limitedness of the international cooperation with the interested institutions in enabling the anti-corruption and integrity system.
- The lack of the citizens' trust in the oversight intuitions seriousness in prosecuting the corrupt persons.

### **3.4. Related parties to play an integral role in achieving the National Cross-Sectoral Strategy for Integrity and Anti- Corruption**

The national team for the National Cross-Sectoral Strategy for Integrity and Anti-Corruption 2020-2022 aspires to mobilize the efforts of all official institutions, the private sector institutions, civil society organizations, political parties and forces, social activists, universities and the research centers, in order to achieve the results approved in this strategy, which was prepared as a complementary for the 21 national sectoral and cross-sectoral strategies. These 21 strategies prepared to achieve the National Policy Agenda “Putting Citizens First”, which is called the Palestinian National Development Plans (NDP).

The following are the major partners in this strategy, and their expected roles in supporting the national efforts or conducting a number of interventions. The said interventions fall under the results of the four strategic goals that cover the focal points of the strategy at the end of 2022:

- 1. President of the State of Palestine:** based on the provisions of the Palestinian Basic Law, the Palestinian people shall elect the President of Palestine directly and publicly. The president is the supreme leader of the Palestinian forces. He shall appoint the representatives of the Palestinian National Authority to other states and the international organizations and foreign organizations, and he shall conclude their assignments. He also shall issue decisions that have the force of law in case of urgencies, and when the Legislative Council is not in session according to Article No (43) of the Basic Law. Moreover, the President of the State of Palestine shall appoint the Prime Minister and authorize the latter to form his government.

Presidency of the State of Palestine represents the declared political supreme will. This supreme will rules the declared endeavor of combating and eliminating corruption in the State. Therefore, it is considered as an effective and integral part in combating corruption. This situation was demonstrated in announcing the National Cross-Sectoral Strategy to Bolster Integrity and Combat Corruption. In the same vein, it directs the Palestinian government in allocating the required budgets to conduct it. The Presidency is also responsible for issuing the required legislations to enhance the integrity and anti-corruption system and for issuing guidelines to activate the role of control institutions and their independence.

- 2. The Cabinet (the Government):** Provided the Basic Law, the Cabinet takes the responsibility of conducting various works concerning many specializations. It is also the competent authority in public policy-making within its respective competence in light of the certified governmental program by the competent authority. In addition, the Basic Law is responsible for conducting the general policies issued by those parties, preparing the administrative mechanisms in the State, supervising it, identifying the safeguards, conducting procedures that ensure the compliance with the laws and monitoring the performance of ministries and the administrative mechanisms.



The Cabinet shall be informed of the different tasks, and it shall practice large powers, especially the ones relevant to the Cabinet's role in preparing and providing law drafts, in addition to its main role in endorsing regulations and provisions for the applicable laws. This is a driving factor for the efforts set afoot for combating corruption and supporting the implementation of this strategy. Moreover, the Cabinet, the framework of its tasks, works on activating and translating the political supreme will in the State regarding combating and eliminating corruption, as well as allocating the required budget to conduct the National Cross-Sectoral Strategy for Integrity and Anti- Corruption. On the other hand, the cabinet has an integral and effective role in coordinating and guiding the entire components of the administrative mechanisms in the State to achieve harmony. This requirement is essential to successfully achieve this strategy through the department's decisions and directions for the competent authorities. The said relationship shall be built on cooperation, and the efforts shall be focused for an effective and genuine implementation of this strategy.

3. **The Anti-Corruption Commission:** based on the provision of the Palestinian Anti-Corruption Law No. (1) of 2005 and its modifications, the Commission was established in July, 2010, as an independent and competent body in combating corruption in Palestine. The Commission practiced multiple powers and authorities within combating corruption, which is mentioned in Articles (8) and (9) of the Law.

The role of the Commission is to combat corruption. This is considered an integral and important role. Given the legislation issued by the State, the Commission is the competent authority in this regard. However, the Commission will not be able to achieve its tasks effectively apart from other components of the State and its departments. The Commission constructed general policies to combat corruption, necessary programs and plans to conduct policies in coordination with all the competent authorities in relation to the State. This role also includes the oversight of implementation processes to ensure the its effectiveness in achieving the anti-corruption policies set, and represented in the cross-sectoral strategy for the upcoming three years 2020-2022. Its role covers the implementation of the laws, the international cooperation, awareness-raising on the risks of corruption and mobilization of the community participation to combat corruption.

4. **Supreme Audit and Administrative Control Bureau (SAACB):** based on the provisions of Article (96) of the Basic Law, the law of SAACB No. 15 of 2004 and its amendments are the fundamentals of the SAACB as an oversight body on the entire bodies and authorities of the State. SAACB has a specific budget within the general budget of the State of Palestine, and it has a legal and an independent entity and a legal capacity, empowering it to practice its tasks and responsibilities in accordance with the terms and specializations assigned to it by the Law.

The role of SAACB is highlighted in the oversight over the collection of public revenue, the expenditure within the budget, administrative inspection to ensure effective conduct and best use of power, expose corruption wheresoever, and the level of compliance of the financial and administrative activities with the applicable regulations, instructions, laws and decree-laws, ensure transparency, integrity and clearness in the general performance, enhancing integrity and trust in the financial, administrative, and economic policies of the

State. This role intercrosses and integrates with the policies and the strategic goals, as well as the results that the strategic cross-sectoral 2020-2022 plan tackles.

**5. Judiciary Authority:** in accordance to Judicial Authority Law No. 1 of 2002 “courts in Palestine shall consist of the following:

First: *Shari’a* and Religious Courts, established by the law.

Second: A High Constitutional Court, established by the law.

Third: Regular courts, which consist of:

1. A High Court, which consists of:
  - a) The Court of Cassation.
  - b) The High Court of Justice.
2. Courts of Appeal.
3. Courts of First Instance.
4. Magistrate Courts.

Each court shall consider the cases brought before it pursuant to the law.”

Judiciary plays an important and fundamental role in enhancing and achieving the execution of this strategy, through enhancing confidence in the judicial procedures and the justice of judgments to maintain integrity and transparency. Moreover, it accelerates the litigation procedures, especially before the courts that consider corruption cases. These cases are fundamental cases that enhance the citizens’ trust in the State in order to combat corruption and meet the policy of combating impunity.

**6. The General Personnel Council (GPC):** It is responsible for controlling the systems and procedures of the civil service in accordance with the provisions of Civil Service Law No. 4 of 1998 including its amendments. Moreover, the GPC represents the technical and executive body of the policies and regulations allocated by the cabinet. It also arranges recruitments, identifies the necessary detailed procedures to implement and monitor the governmental bodies in terms of applying the rules, regulations and decision of personnel affairs in its areas of specialty. The GPC also provides studies and research on developing services in different aspects. In terms of the oversight, the GPC is authorized to:

- Control the enforcement of provisions of the civil service law and ensure the proper compliance of the governmental departments with the legislations of the civil service.
- Identify the general roles of recruiting in different governmental departments and the basis of choosing qualified people to fill a public job vacancy as well as control the implementation.
- Set the general policy of measuring the efficiency of employees in the civil service, as well as identify the standards and models used to measure the efficiency of governmental departments.
- Examine the work mechanisms and procedures in the administrative bodies, develop\ them and simplify them.
- Follow-up the personnel administration in different governmental departments, drive it to the best methods to comply with the rules, regulations and decisions regarding

personnel management. It also authorized to control the records of recruitment, promotion, transfer, disciplinary action and other matters of the civil service affairs.

The GPC also audits the documents and decisions regarding personnel management in terms of recruitment, promotion, transfer, hiring, loan, end of service and data of entry in the GPC's records to ensure their compliance with the applicable law and regulations.

The role of the GPC revolves around enhancing the anti-corruption system efforts to ensure the effective implementation of the Civil Service Law No. 4 of 1998, and the entire systems and regulations issued in accordance with it. Moreover, the GPC plays an important role in the processes of job description, preparing the formation annual table required for the entire governmental departments and studying the organizational structure of the governmental departments. In the same vein, the GPC is an integral part of the implementation of this strategy. Especially, it considers the factor of awareness-raising and preventive aspects that target the public sector as employees or organizational groups "quality, control and audit" or those that enhance the procedures of recruitment, promotions, and incentives for employees. Simultaneously, it takes into consideration ensuring integrity, transparency, and justice that maintain equality and the right to fair competition among employees..

**7. The Independent Commission for Human Rights ICHR:** It was established in 1993 according to a Presidential Decree, which includes the following duties: "following-up and guaranteeing providing the requirements of safeguarding human rights in different Palestinian laws, by-laws and regulations, and the work of various departments, agencies and institution of the State of Palestine and the PLO. It aims to meet the requirements for safeguarding human rights of the Palestinian citizens. It has a full membership in The International Coordinating Committee of National Human Rights Institutions (ICC). The ICHR is financially and administratively fully independent.

The role of ICHR revolves around raising the social awareness on the civil and political rights focusing on the rights of the vulnerable groups, especially women, children, youth, and disabilities. It also aims at developing its mechanisms regarding following up with the cases and complaints in coordination with law-enforcement institutions, especially the Commission. ICHR also provides TA in the subject of the compatibility of the national legislations with the international relevant treaties.

**8. The Palestinian Civil Organizations:** In Palestine, the civil society organizations are active. Law No. (1) Of 2000 concerns the charitable organizations and local committees. The civil organizations provide various services among education, health, agriculture, economic and social development, human rights, empowering youth and women. Their services cover all categories and areas including Jerusalem. The Palestinian Ministry of Interior and the ministries of competences, according to the law, regulate and monitor the works of all Civil Society Organizations. These organizations coordinate their works through networks and coalitions that include several civil organizations. These organizations depend on foreign grants and support. Some of which depend on the service-providence cost and on the local contributions or some investments.

Civil Organizations also play a role in enhancing the anti-corruption and integrity system, awareness-raising and education, training groups within their area of specialization and enhancing national participations which aim at combating corruption. The civil society organizations have an oversight role over the management of the public finance and affairs. The organizations also participate in reviewing legislations and policies and providing recommendations to enhance the legislative system. These organizations play an integral role through activating the tools of the social accountability in the sectors they are active in.

**9. Institutions Represent Private Sector:** a group of institutions represents the Palestinian private sector. They are nominated to be part of the efforts in combating corruption. These institutions are: Palestine Trade Center PALTRADE, Palestine Capital Market Authority, and Palestinian Businessmen Association, Association of Banks in Palestine, Palestinian Association of Certified Public Accountants, Palestinian Insurance Federation, and Palestinian Federation of Industries, the Federation of Palestinian Chambers of Commerce.

The core of the private sector institutions' role is supporting the efforts of combating corruption. This can be done through areas related to the social responsibility in supporting the initiatives of combating corruption on one hand. On the other hand, its role is enhancing governance of the member organizations or those in the area of the representative institutions. This will restrict the conflict of interests in relations with the public sector. Moreover, it will play a role in enhancing public services for citizens in some areas such as electricity, water, and telecommunications and others.

**10. Media:** applicable legislations allow the diversity in the media and the access to it by the private sector and the civil society institutions. Therefore, in Palestine, a big number of media institutions that follow the governmental sectors such as, the Voice of Palestine, Palestine TV, Al-Hayat Newspaper and Palestinian News and Info Agency WAFA are active among the private media agencies or those related to the civil society institutions and other media agencies relevant to political parties and factions.

Media plays a fundamental role in enhancing the integrity and anti-corruption system. This role is realized through contributing to social awareness-raising, encouraging civilians to report on corruption, enhancing the civilians' trust in the institutions of law-enforcement. Media is the main role-player in the social accountability based on professionalism. Moreover, it plays a distinguished and strong role through the journalistic investigative reports that shed the light on multiple important cases of corruption suspicions.

**11. Local Government Bodies and the Representative Institutions of Local Governance:** Local government bodies are units that manage the entire matters and services related to civilians. These bodies work on enhancing the civilians' livelihoods, improving the local society in a certain geographic and administrative in line with the authorities and responsibilities stipulated in the law of the Palestinian Local Governments Law in 1997. In accordance with the Law, the role of the local government bodies mainly focuses on providing main services to the civilians such as water, wastewater and solid-waste treatment, sanitary, and building public markets, transportation, traffic, parks, and cultural centers.

Local bodies play an integral role in the efforts of combating corruption through enhancing their governance, their relationship with the citizens and their response to the social accountability initiatives. This role in turn causes enhancing the level of integrity and the quality of services provided for the civilians, and it will directly influence the changing of the public impression among civilians on the performance of these bodies, which will enhance their satisfaction. In like manner, multiple parties will play the roles of oversight, TA and organization of the work of the local bodies to achieve the required results. The said bodies include the Ministry of Local Government, Municipal Development and Lending Fund, and the Association of Palestinian Local Authorities.

**12. Universities, Research and Studies Centers:** multiple universities, institutes and long-standing research centers are active in presenting educational services and academic research. The foremost among them are Birzeit University, Al-Najah University, Al-Quds University, Bethlehem University, Palestine Technical University, The Arab American University, Al-Quds Open University, Al-Istiklal University, Al-Azhar University, and The Islamic University, in addition to multiple studies centers. The Palestinian Ministry of Education and High Educations is managing the work of the all of the Palestinian universities, whether controlled by civil society institutions, private or governmental universities.

Educational institutions have an important role in building a culture that rejects corruption through establishing the values of integrity, equality, social justice and the sense of responsibility. It accomplishes that through enhancing the spirit of citizenship and combating corruption, in addition to providing studies and specialized researches in the integrity and combating corruption, providing TA and training the cadres.

**13. Ministry of Finance and Planning:** The Ministry of Finance and Planning contributes to draw the financial policy of the State and monitor its implementation. It takes into consideration the effective contribution of achieving wholeness among economic, financial, and monetary policies, as well as achieving harmony within its tools to form a system for the economic stability and its development. It will contribute to achieve the SDGs and to elevate the livelihood on all levels and to support the strength of the national economy in face of the big challenges that face it nationally and internationally. It also funds the budget of the State through the local revenues. The said revenues are represented in taxes, and external funding. It also takes its responsibilities through an action plan that supports the Palestinian plans of reform and development, given the transparent approach that seeks to fulfill the sustainable development. The Ministry of Finance and Planning, based on its message statement, seeks: efficiently and effectively managing the public finances through growing the revenues and rationalizing expenditure using transparent and fair financial systems, supported by control procedures.”

The Ministry of Finance and Planning has an important role in continuing the efforts made in rationalizing expenditure in different fields and identifying a comprehensive plan based on studies in the rationalizing fields, enhancing control on the level of the responsibility of the public expenditure standards, and preparing an implementation plan for the national cross-

sectoral strategy to manage the public finances and the public procurements, which include evaluation and following-up, to combat tax evasion and money laundering.

## **Section IV, Aspirations and the general orientation of efforts made to enhance the integrity and anti-corruption system**

### **4.1 Vision, effective and participatory framework unites the efforts of all parties**

**Vision: an integrity-based Palestinian environment that advocates against corruption to reach a corruption-free Palestinian society**

Palestine seeks to combat corruption, limit its different types in the Palestinian society, address its causes, prevent it and activate the social culture that rejects it. It achieves that through the participation among the national, official, and social institutions and the coordination with the international community. This could be undertaken through setting national policies and serious preventive and oversight procedures, and through effectively prosecuting perpetrators to hold them accountable to achieve the public prevention of corruption with all of its forms and preventing impunity.

We believe that our work in combating corruption is a part of the long resilience history of the Palestinian people. We are also firm believers in its ability to bolster the sacrifices of the Palestinian martyrs and prisoners, and the elite of the Palestinian fighters against occupation, oppression and injustice Palestinians face on a daily basis due to the measures of occupation. We believe that our struggle will contribute to achieve our national and lasting rights. The priority is the right to return, self-determination and the establishment of the Palestinian State, with Jerusalem as its capital. A dark era will end in our people's history, whose resources have been stolen by a State claiming democracy.

We will take in consideration the Basic Law about ensuring rights, personal and public liberties without discrimination to achieve justice and equality for all bar none. As for the rule of law it will achieve balance among authorities in pursuit of the supreme national benefit.

The President of the State of Palestine supports us in word and actions. He constantly puts efforts forward to achieve progress, combat corruption and assets recovery. **"...We shall not exclude anyone, meaning, those committing crimes of corruption whoever they are bar none, from the top of the pyramid to the bottom. I informed him not to be merciful with any perpetrators in case you received a complaint on any, the complaint shall proceed, until it either is turned over to the court, or is acquitted. We shall combat corruption. Praise be to Allah we almost managed, or even succeeded at achieving just that."** This is part of the President's speech during the opening of the conference of enabling the role of the private sector in the governance anti-corruption efforts, on December 8<sup>th</sup>, 2018.

Our values stem from the Palestinian culture and the Arab nation. Further, human principles and values are the main reference of our decisions, positions, and work at home and abroad. We are firm that eradicating corruption and achieving prosperity and dignity for all shall not



be achieved without complying with the national and human values system, among which are courage, integrity, patience, professionalism, putting Palestine first, the rule of law and the participation of all.

We will all work within a context that Palestine is for all; taking into consideration the participation of everyone in combating corruption and eliminating it, women and men, farmers, workers, young people and elders, people with and without disabilities, people living in villages, neighborhoods and refugee camps, and we will not forget our brave prisoners.

## 4.2 Our approach, changing paths, and policies governing the general framework of cross-sectoral results and interventions

Our goal is to achieve a corruption-free Palestinian society, through two main paths. The first focuses on collective efforts to achieve a society that **treasures the anti-corruption values and social culture** regardless of its forms and sizes. The second focuses on achieving a **national institutional and legislative system that counters impunity** and recovers assets without delay or negligence. We shall work together to achieve the required results through the four strategic pillars.

Changing Paths	Strategies	Policies Relevant to the Pillars
A society that adheres to social values and a culture that combats corruption	<ol style="list-style-type: none"> <li>1. A set of preventive measures.</li> <li>2. Enhancing social participation</li> </ol>	<ol style="list-style-type: none"> <li>1. Having information on the general performance of the institutions is available for everyone in an orderly and timely manner, based on the legislative system and clear and binding institutional measures.</li> <li>2. The public opinion-makers contribute to spread awareness regarding the reasons and effects of corruption in the different sectors, as well as mobilize the people's positions to support the national efforts which aim at enhancing the integrity and anti-corruption system.</li> <li>3. integrate activities, interventions and goals related to enhance the integrity and anti-corruption system within the official institutions, private sector and the civil society institutions.</li> <li>4. Review and develop the role of the education with its different levels in consolidation of social value system that denies corruption and enhances the citizen participation in the efforts that aim at eradicating corruption.</li> <li>5. Enable social activists on the local and national level to hold accountability for the officials through initiatives of social accountability.</li> <li>6. Drawing on the studies, researches, and lessons</li> </ol>

		<p>learned as a base of knowledge and identifying situations.</p> <p>7. Having an independent, external, internal, and effective oversight over all institutions that manage the public affairs.</p> <p>8. Preventive procedures and measures that are invested in the public institutions to protect the employees from being exposed to corruption.</p> <p>9. Identifying a legislative system to enhance the preventive measures and the citizens' participation.</p> <p>10. Enhancing the integrity and transparency of funding the electoral campaigns.</p>
A national, legislative and institutional, system that counters impunity	<p>3. Efficiency, effectiveness, and comprehensiveness in law enforcement.</p> <p>4. International and regional cooperation</p>	<p>11. Constant harmonization of relevant laws, regulations, and instructions based on the international treaties and conventions and the developments in the Palestinian situation and the national and Arab experience.</p> <p>12. Considering procedures and positions on a high level to enhance the citizens' confidence in the institutions of law enforcement.</p> <p>13. Activate the Palestinian participation in the regional, Arab, and international relevant efforts, which considering building knowledge and experience and exchange information and supporting the situation.</p> <p>14. Building the institutional and organizational capacities of the law-enforcement institutions.</p>

### 4.3. The Cross-sectoral Results of the First Strategic Pillar, Preventive Measures

#### **The Strategic Goal: Enhancing the preventive measures of corruption in the Palestinian public institutions.**

This pillar reflects Article 2 of the UNCAC. It is an emphasis of the National Policy Agenda 2017-2022. The second pillar of the Agenda focuses on **the reform and quality improvement of the general services, and the importance of improving the process of service-providing to civilians at the maximum levels of integrity and transparency.** The Agenda created priorities and policies that emphasize the enhancement of accountability, transparency and the commitment of the governmental institutions to the code of conduct and combating corruption in all its types.<sup>11</sup> This pillar builds up on the previous efforts done by the official and civil institutions and their governmental and non-governmental commissions. The areas of which are enhancing and strengthening the preventive measures on the corruption offences during the previous years through multiple procedures such as the harmonization of some legislatives, laws, regulations and rules that regulate the governmental and non-governmental work with anti-corruption law, principles of adhering to integrity and transparency in line with the UNCAC.

The expected results and the suggested interventions are based upon the self-evaluation report of 2018, were about the harmonization of the national legislations of the Articles (2) and (5) of the UNCAC and the requirements of achieving the full obligation to the provisions of chapter 5 of the UNCAC on corruption preventive measures. Article (5) of the UNCAC indicated the following: “Each State Party shall endeavor to periodically evaluate relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption.”<sup>12</sup>

The preventive pillar of the strategy targets those subjects to the Anti-Corruption Law at all of sectors, especially service providing sectors. Those are tackled in the previous strategies in the context of seeking protecting them from the risks of corruption given they are more exposed to the risks of corruption like health, diplomacy, security, local government, justice, private sector and **managing the public finance sectors.**

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<sup>11</sup> National Policy Agenda 2017-2022

<sup>12</sup> UNCAC

### The intended results and suggested interventions in the different sectors:

Medium-term Results	Basic Interventions
<b>Result 1, adopting legislations that enhance an anti-corruption environment</b>	<ol style="list-style-type: none"> <li>1. Reviewing national laws and regulations and their compatibility with the requirements of the UNCAC in different sectors.</li> <li>2. Achieving the procedures of issuing the law of the right to access to information and identifying mechanisms of getting into force.</li> <li>3. Following-up with issuing and implementing regulations of receiving gifts and conflict of interests.</li> <li>4. Launching the process of developing a law to prevent monopoly and providing concession.</li> <li>5. Reviewing the enhancement of integrity and transparency of funding the election campaigns.</li> <li>6. Reviewing and developing the systems and procedures of promotion and appointment for high-level employees and adjusting them to enhance equal opportunities.</li> </ol>
<b>Result 2, oversight organizational instruments and structures are active in the institutions</b>	<ol style="list-style-type: none"> <li>1. Establishing enrolled public administration in the name of the public administration of integrity and preventive of anti-corruption within the new organizational structure and supporting it with trained human cadres.</li> <li>2. Developing the performance of the internal control in the institutions that manage the public matter.</li> <li>3. Developing the performance of quality, complaints, and gender units in the institutions and departments that manage the public matter.</li> <li>4. Activating the method of analyzing the risks of corruption in the concerned parties, especially the services providing.</li> <li>5. Activating the usage of social cash-based aid and non-cash aid gate in the State.</li> </ol>
<b>Result 3, employees in the institutions and civilians protected from being susceptible to corruption.</b>	<ol style="list-style-type: none"> <li>1. Following up with the commitment to code of conduct and governance rules, preparing code of conducts for sectors, and excluded institutions.</li> <li>2. Preparing a programme on spreading awareness and training employees in the institutions on transparency, accountability, and relevant law in centring corruption.</li> <li>3. Organizing social awareness campaigns in participation of clerics on the reasons and effects of corruption and criminalizing it.</li> <li>4. Preparing and adopting the instrument of national integrity that restricts corruption in different phases while public purchase.</li> </ol>
<b>Result 4, public institutions effectively participate in the efforts of enhancing the integrity and anti-corruption system in the relevant sectors.</b>	<ol style="list-style-type: none"> <li>1. Enrolling the system of integrity and combat corruption within the sectoral and cross-sectoral plans and budget programs.</li> <li>2. Preparing and following up with the execution of control, evaluation, and accountability systems on the plans and programs of the institutions that manage the public matter.</li> <li>3. Supporting research centers, post-graduate studies, and researchers to conduct researches, studies, and dissertations in the field of integrity and combat corruption system in the different sectors.</li> <li>4. Organizing an annual event to exchange expertise and information on the plans, programs, and interventions of the</li> </ol>

Medium-term Results	Basic Interventions
	<p>relevant institutions work in enhancing the integrity and combat corruption system.</p> <ol style="list-style-type: none"> <li>5. Enrolling the purposes of SDG no. 16 and its indications in the sectoral and cross-sectoral plans.</li> <li>6. Preparing national plans that restrict the tax and custom evasion.</li> <li>7. Activating the recommendations of the national committee to combat money laundering.</li> <li>8. Preparing sectoral strategic execution plan to manage the public money 2017-2022.</li> </ol>

### **4.3. Cross-sectoral results of the second pillar, Social Participation**

#### **The Strategic Goal, Activating Social Participation and Accountability in Combating Corruption**

This pillar aims to widen the community and institutional foundation that supports and influences the efforts of combating corruption. This can be done through raising the awareness of the society on corruption crimes, and the mechanisms of participating in rejecting and combating it. Moreover, it is important to raise awareness on the risks of corruption in the society, through using different methods such as raising-awareness materials, media, beneficial events and different social media platforms.

This pillar is in compatible with the UNCAC regarding necessary measures to inform the civilians of the anti-corruption commissions and raising awareness among them about the risks of corruption.<sup>13</sup> This also comes in line with what is implicitly mentioned in the National Policy Agenda 2017-2022 in policy 9.<sup>14</sup>

The effort of the Commission and the parties in executing the two previous strategies stressed on the importance of creating social environment that enhances and consolidates the values of integrity and transparency that stimulate social accountability and hold perpetrators accountable. Moreover, the efforts of the parties in combating the culture of facilitating corruption through conducting thousands of awareness-raising activities, which aimed at most of the Palestinian social sectors. In addition, they worked on enhancing the spirit of social participation, and establishing embodiments that combat corruption inside institutions.

The civil society, especially universities and civil society organizations play a big role in enhancing the service, cultural, awareness-raising, educational, media, juridical and legal areas, as well as protecting the interests of the marginalized groups. They also control the role managing the public affairs and finance. Accordingly, the need stems to enhance and include integrity and transparency, set forth the efforts to combat corruption in the strategies of the civil society institutions and organizations, and to prepare programs and plans. The said programs and plans consider raising the social awareness of citizens on the devastating risks and effects of corruption on the indicators of sustainable development in their environment. In the same vein, the civil society seeks the attention of the local society on the importance of activating the social control and accountability of the international institutions in managing public affairs and finance. The aim here is to achieve an impermeable society that denies corrupt acts based on its full awareness of the devastating risks of corruption.

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<sup>13</sup> UNCAC

<sup>14</sup> National Policy Agenda 2017-2022

## The Desired Results and the Suggested Interventions in the Different Sectors

<b>Medium-term Results</b>	<b>Main Interventions</b>
<b>Result 5, educational curricula in the educational institutions are incorporated in the system of integrity and combating corruption.</b>	<ol style="list-style-type: none"> <li>1. Educational curricula in the schools are to incorporate the concepts of integrity and combating corruption.</li> <li>2. Educational curricula and scientific researches in the universities are to incorporate relevant subjects of the system of integrity and combating corruption.</li> <li>3. A training program that enhances the teachers and supervisors' expertise and knowledge on the concepts of anti-corruption and integrity system.</li> <li>4. Students' initiatives in schools and universities to enhance their understanding of the concepts, causes and effects of corruption.</li> </ol>
<b>Result 6, effective national, local, feminist, youth, and social initiatives in holding officials accountable.</b>	<ol style="list-style-type: none"> <li>1. Facilitating and supporting the establishment of coalitions and alliances in the different sectors.</li> <li>2. Arranging accountability campaigns and activities in the different sectors.</li> <li>3. Identifying standards, foundations, and projects manuals, and developing social accountability methods.</li> <li>4. Encouraging conducting relevant studies and reports in social accountability in the sectors.</li> <li>5. Arranging a national day for social accountability in all sectors.</li> </ol>
<b>Result 7, media and public-opinion makers are professionally active in the efforts of combating corruption.</b>	<ol style="list-style-type: none"> <li>1. Preparing and issuing media strategy to combat corruption and distributing it in contribution of enhancing the role of media in combating corruption.</li> <li>2. Supporting media programs and activities in enhancing the system of integrity and combating corruption.</li> <li>3. Supporting Training programs for journalists in terms of relevant concepts, tools, and legislations to enhance the system of integrity and combating corruption.</li> <li>4. Supporting journalists' initiatives in producing and releasing relevant survey reports.</li> </ol>
<b>Result 8, civil society institutions are engaged in the efforts of enhancing the anti-corruption and integrity system.</b>	<ol style="list-style-type: none"> <li>1. Incorporating the programs and plans of the civil society institutions in activities and interventions of enhancing the system of integrity and combating corruption in different sectors.</li> <li>2. Reframing the efforts of the civil society institutions regarding the system of integrity and combating corruption in different sectors.</li> <li>3. Training and qualifying the institutions of civil society in the field of good government and governance.</li> </ol>

## 4.4 Cross-sectoral Results of the Third Pillar. Law Enforcement

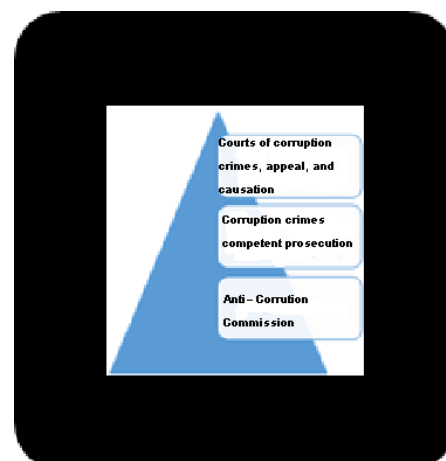
### The Strategic Goal: Law Enforcement and Counter Impunity

The Palestinian Anti-Corruption Law no. (1) of 2005 and its amendments considered as one of the good legislations on the regional and international levels, as it includes the following: provisions that criminalize acts of corruption, measures and safeguards to ensure a balance between the responsibility of the State in holding accountability of corruption perpetrators, the right of (perpetrator of corruption) to defend himself, and the duty of society in supporting the efforts of the State in reporting on corruption. However, the practical application of the previous years indicated the importance of reconsidering the Palestinian legislative system (package of laws on criminalization, punishment, and protection), and adding the necessary modifications to enhance accountability, prosecution, and protection.

Fulfilling the priorities mentioned in the pillar required working on changing, developing and improving the foundation of combating corruption, especially legislations, laws and regulations. Moreover, since the citizen perception on the law- enforcement situation is highly significant, it is essential for us to work on enhancing the citizen trust in the law-enforcement institutions. Considering this perception is one of the most significant indicators that reflect combating and eradicating corruption within the State.

The Palestinian society, civilians and institutions are important and fundamental partners in the State's efforts in law-enforcement, as reporting and exposing corruption are the starting points of moving forward in the procedures of accountability and prosecution and then punishment of perpetrators to achieve deterrence on the public and private levels. Therefore, and in order to motivate and encourage the society and all its components to be part of the real participation with the States' invitations concerned with enforcing the law, considering the protection of the whistle-blowers, witnesses, and experts, and strengthening this protection and widening it to include legal and personal protection will have positive impact on the reality of corruption and eliminating it.

During the period of conducting the previous strategies, the law-enforcement institutions have been strengthened. In other words, the Commission was supported with a number of experts, increasing the number of prosecutors of combating corruption, increasing working days of the court of corruption crimes from two to five days, conducting trainings and meetings to enhance the employees' capacities in the law enforcement institutions, and increasing coordination between police and the Commission. During the period of executing this strategy, we are looking forward to enhance the competencies of the Commission in the areas of evidencing, investigation, analysis, tracking, and





management of issuing financial disclosure, which enhance the principle of accountability. Moreover, strengthening and supporting the prosecution and combating corruption court with the advanced methods in the area of managing operations, and litigating on corruption offences.

### **The Pursued Results and the Suggested Interventions in Different Sectors**

<b>Medium-term Results</b>	<b>Basic Interventions</b>
<b>Result 9. The Palestinian legislative System in enhancing law enforcement and compatible with the UNCAC.</b>	<ol style="list-style-type: none"> <li>1. Reviewing penal law, anti-corruption laws, and code of criminal procedures to enhance the law enforcement and proceeding.</li> <li>2. Following up with the implementation, application, and circulation of the system focused on protecting informers, witnesses, and experts.</li> </ol>
<b>Result 10. The procedures of deduction, exploration, investigation, and litigation of the law enforcement institutions are active.</b>	<ol style="list-style-type: none"> <li>1. Developing human resources capacities in law enforcement institutions, and enhancing their financial capabilities.</li> <li>2. Framing coordination methods among working parties in the area of law enforcement, especially police, security services, prosecution, and judiciary.</li> </ol>
<b>Result 11. The confidence of society in the capabilities of institutions, law enforcement, and reporting corruption is strengthened.</b>	<ol style="list-style-type: none"> <li>1. Building the capabilities of law enforcement institutions in media that is connected with corruption cases.</li> <li>2. Allocating journalists to cover corruption cases in the different phases, and providing necessary capabilities to fully conduct their tasks.</li> </ol>

## **4.5 Cross-sectoral Results of the Forth Pillar: International Cooperation**

### **The Strategic Goal: Enhancing International and Regional Cooperation in the Areas of combating corruption**

The State of Palestine acceded to the Arab Convention against Corruption in 2010 and the UNCAC in 2014. It acceded to the Riyadh Arab Agreement on Judicial Cooperation. Palestine met the requirements of reviewing the implementation of UNCAC of the second and fifth chapters of the UNCAC then published the report. As well the Commission prepared the self-evaluation report for the same two chapters of UNCAC. The review implementation of those chapters is waiting for the final report by the United Nations Secretariat against Drugs and Crime. In the same vein, Palestine acceded to the INTERPOL, Arab Criminal Data Prosecution Department (Arab Police) which is a member in the International Organization of Supreme Audit Institutions (INTOSAI) represented by the SAACB.

The development of the criminal mindset has led perpetrators of corruption to commit cross-borders crime. This type of crimes is complicated if the offenders succeeded at smuggling money outside the State's territories. Activating relations with the Arab and friendly countries is considered important for Palestine, especially in enforcing law, and extradition of criminals and recovery of the criminal proceeds, in which they are considered contentious cases. The execution of which is considered weak on the international level.

In Palestine matters are more complicated because of the Israeli occupation degrading the Palestinian Jurisdiction, which still controls the borders. Moreover, some relevant domestic penal legislation are old in the judicial cooperation, which is a challenge in the competent authorities of enforcing law in their pursuit for conclusion of international coordination agreement in this field.

Palestine has achieved an important international achievement in 2018 by chairing the G 77 & China, which we look forward to obtain the maximum benefit of it, as one of the main motivational factors to strengthen international cooperation in the field of judicial cooperation on one hand, and strengthen bilateral relations between the Commission and peers on the international level in the area of exchanging experience, TA, and conclude new cooperation treaties.

Participating in the international activities and conferences on combating corruption is important for the State, as it is a platform to emphasize its identity on one hand. And on the other hand, informing the international community that Palestine is internationally presented and has methods and capabilities. This qualified Palestine to have an active role on the efforts of combating corruption within the frame of the UNCAC. It also has the experiences that can convey and circulate among the UNCAC's member states.

International and regional cooperation has special importance regarding the presence and future of the law enforcement institutions in the State. This is achieved through continuous searching of the possible support and fund of the work environment on the level of

infrastructure, projects, developmental programs for their human resources and the needs of substantive and technical support.

### **The Desired Results and the Suggested Interventions in the Different Sectors**

<b>Medium-term Results</b>	<b>Basic Interventions</b>
<b>Result 12. The judicial, regional, and international coordination is active.</b>	<ol style="list-style-type: none"> <li>1. Activating the follow-up of convictions on corruption cases, extradition of criminals, mutual legal assistance and recovery of criminal proceeds with relevant international bodies.</li> <li>2. Framing relations in the area of international and regional judicial cooperation in one local platform that ensures its effectiveness.</li> <li>3. Creating a unit of local and international cooperation in the Commission.</li> </ol>
<b>Result 13. State of Palestine is active in the international forums, networks, and international and regional commissions concerned in combating corruption and exchanging experiences.</b>	<ol style="list-style-type: none"> <li>1. Seeking the accession of the international and regional forums, networks, and initiatives.</li> <li>2. Experience exchanging programs between Palestine and the international and regional relevant parties of combating corruption.</li> </ol>

## Section V. Measures of Implementing the National Strategy in Combating Corruption

### 1.5 General Policies to Implement the Strategy

1. **Creating a national team to oversight over the implementation and evaluation of the National Cross-Sectoral Strategy for Integrity and Anti-Corruption.** The Commission endeavors high-level decisions to create a national team to monitor the implementation of the strategy, so that it includes a group of experts in the subject matter in the area of combating corruption, reform, good governance from the main partners in implementing the strategy by the official parties of ministries, and main general administrations in addition to representatives of the civil society organization such as, NGOs, media, and legal juridical institutions. The team also includes representatives of the private sector.

The Commission is chairing the national team which will execute the following:

- Oversight and coordination to prepare annual plans for the partners-institutions to ensure its compatibility and inclusion of what is mentioned in the strategy.
  - Follow-up with the inclusion of activities and efforts of enhancing the system of integrity and combating corruption in the sectoral and cross-sectoral plans, and the budget programs of entire sectors.
  - Reviewing all reports connected with executing. These reports are presented by the implementation parties, including sectoral challenges and recommendations in order to ensure the compatibility, integration, and comprehensiveness the covering of the entire relevant subjects in enhancing the system of integrity and combating corruption. Moreover, ensure that no interventions shall hinder the process of executing the plan.
  - Monitoring conducting of annual and national workshops to present annual report on the achieved results and implantation of the strategy and challenges and obstacles recorded. This comes as a form of accountability for the national team and the parties involved in the implementation of the strategy on one hand, and to increase integrity of actions and activities implemented and evaluate them on the other hand. Moreover, tackling obstacles and suggesting solutions to overcome them, in addition to tackle the financial situation that covers the strategy's activities of the next year and the mechanism of public finance expenditure on executing the plan in the previous year.
  - Identifying recommendations for the official bodies to adopt policies and measures to enhance the system of integrity and combating corruption in compatible with the national priorities.
2. **Inclusiveness and Concentration:** the strategy targets working in all related sectors to run the public affairs and has an effect on public finance management the Palestinian people life and dignity. Namely, the related sectors to governing, politics, security service providing, infrastructure, the social and economic development.

Based on the Palestinian Development Plan, the sectors include agriculture, culture and heritage, education, operation, energy, healthy environment, housing, communication and information technology, international relations, justice, local government, national economy, public finance management, security, social protection “social development”, tourism and architecture, transportation, water and waste water, equality and gender, and youth. Sectors also include others, in addition to the sectors of the Palestinian Development Plan. Those sectors are of importance in providing services to the Palestinians and enhancing their livelihood and are not enrolled in the Palestinian Development Plan.

We will work on directing all partners on **identifying a number of priorities to enhance the system of integrity and combating corruption in each sector**. This will take into consideration identifying priorities based on discussions among partners and those involved on each sector, in order to serve achieving the sectoral results of the cross-sectoral strategic sectoral to enhance the system of integrity and combating corruption and contributing in enhancing the services and civilians’ welfare in all governorates.

3. **Partnership and Compatible Work:** the national strategy of combating corruption seeks to be a directing and comprehensive **frame of the efforts of all relevant parties** in enhancing the system of integrity and combating corruption. This includes all official institutions, and civil society institutions, private sector, local governance commissions, academic parties, and the international institutions working in Palestine.

The strategy is depending on the principle of **real partnership and complementary of roles** among all relevant parties during the implementation. The role of the Commission in its capacity as a leader of the national efforts in combating corruption is **an execution and oversight** those empowers the Commission **to mobilize efforts and national and international resources** and direct them to the priorities in all sectors. This will enhance the system of integrity and combating corruption on the national level.

The Commission and partners will use **the dialogue approach to include work of all public institutions**, especially institutions and ministries that are responsible of leading the basic sectors for activities and interventions relevant to enhancing the system of integrity and combating corruption in its institutions first and then the concerned party.

4. **Recruiting the necessary financial and human resources:** allocating money and necessary appropriations to execute this strategy is considered one of the big challenges that the strategy face, under the current conditions represented in reducing the budget of all governmental departments. This is followed the reduction in the international support presented from the international society for the State of Palestine. However, the Commission will work in coordination with the partners from targeted and different sectors on allocating appropriations within their budget and the budget of the Commission. This is in addition to search and communicate with the government and presidency to present suggestions that would contribute in monitoring and providing the required annual budget to execute the strategy in light of identified priorities based on the working annual plan. The Commission will also work in support of its partners on

promoting this strategy among donors to urge them to support the execution budgets and guiding their projects towards the strategy.

5. **Reviewing and Annual Planning:** the Commission, as the leading institution and through the national team, will conduct annual review for all strategic pillars at the end of each year through presenting accomplishments that achieved by the partners institutions in all strategic pillars and discussing changes on the combating corruption environment and the extent of its impact on achieving cross-sectoral goals and results, and identifying work priorities for the next fiscal year.

The Commission will prepare an annual plan on its goals and the required budgets to be a mode for the annual planning for the partners' institutions in executing the strategy. The Commission will also work on facilitating the conducting of meetings and workshops for the partners to present their plans and discuss them as an enhancement of coordination and information exchange and avoiding any conflict in efforts.

## 5.2 General Policies for Following-up, Evaluation, Accountability, and Education

- **Goals (Objectives):** the overall follow-up, evaluation, accountability, and learning activities aim at supporting the national team and public decision-makers in the Commission and the partners institutions with the necessary information and knowledge to direct institutions, plans, and programs towards relevant national priorities and ensuring achieving best results. Moreover, supporting them to take the right decisions to ensure pursuing the way of achieving the goals and pursued changing. This is in addition the importance of follow-up and evaluation in enriching the knowledge of all of those who work in the area of enhancing the system of integrity and combating corruption, and enhancing tools, methods, and ways the institutions follow **based on lessons learned by experience** and national, regional, and international practice, especially in relation to the hypotheses the series of results are built on (interventions, results, and goals).
- **Responsibility and Tasks:** it is the main responsibility of the national team to follow-up, accountability, evaluation, and enhances learning in the National Cross-Sectoral Strategy to Bolster Integrity and Combat Corruption. The national team who is also responsible for following up with the strategy execution that is **supported by the Public Administration of Planning and Policies in the Commission** in terms of organizational and administrative support. The Planning and Policies department in the Commission is allocating the necessary human and financial resources to achieve the overall of following-up, evaluation, accountability, and learning activities supported and guided by the national team. The Commission will use tools, official and national structures, private sector, universities, civil society institutions, and international institutions to provide the required sources and experiences.
- **System and Methods:** the Commission, directed by the national team and the effective participation from the concerned partners in enhancing the system of integrity and combating corruption, will work on **developing the following-up**

- and evaluation system.** This includes the matrix of follow-up and evaluation and the entire methods necessary to achieve the goals of this system. The system shall identify foundation, standards, and methods that will be applied in order to enhance accountability in the sector to achieve focused performance on the effectiveness and efficacy of work.
- **Baseline Study:** the baseline (previous study) aims at identifying the value of cross-sectoral results measurements indicators, which agreed upon and approved by the partners. This study helps in identifying the desired goals at the end of 2022, which is the period of the current strategy. This will contribute at enhancing accountability, directing, and the taking corrective decisions of the adopted pillars and lines. The General Administration of Planning and Policies, as specialized department responsible to oversight on the management and follow-up of all processes and activities related to planning, studies, drawing policies and strategies and the institutional quality, monitoring corruption indicator in compatible with the goals and directions based the procedures and approved instructions by the competent party, **will identify the entire necessary measures to study the baseline of cross-sectoral results measurement indicators in coordination with all partners of the public and non-governmental sector.**
  - **Coordination and Exchange of Knowledge:** the Commission will work on creating methods to exchange and circulate relevant knowledge through annual event includes all involved in enhancing the system of integrity and combat corruption. Also, the Commission will organize meetings and workshops on the pillars of the strategy in order to exchange knowledge and experience, and to find stable connection methods between the Commission and the official institutions on one hand, and finding stable connection method between the civil society institutions and the international institutions on the other.
  - **Activating the Monitoring Method of the Integrity and Combating corruption System:** the Commission will work on reviewing the policies and working plan of the national monitoring method of the system of integrity and combating corruption directed by the Commission, in order to support the system with information focused on follow-up and evaluation, and developing activities relevant to monitoring and documentation to ensure achieving the lessons based on facts and evidences. The team also contributes at conducting some studies and surveys relevant to measurements indicators of the sectoral results.
  - **Activating the Function of Policies and Studies:** the Commission will activate the Policies and Studies Department to empower it to monitor necessary studies and analysis to provide the system with follow-up and evaluation, and to support the information system of follow-up and evaluation with the required information. Moreover, the Commission will work on signing memorandums of understanding by which the studies and researches are directed towards studies and surveys that contribute in enhancing the role of data and knowledge in drawing policies and considering plans the priority.

- **Coordination with the Palestinian Central Bureau of Statistics:** the PCPS is responsible for establishing a unified and comprehensive statistical system to be under the control of the Palestinian ministries and institutions, to be used for guiding in problem investigation and evaluating progress. Moreover, PCPS is presenting accurate and official statistics on the demographic, social, economic, and environmental situations and orientations to serve the Palestinian society. In this context, the Commission is to sign a memorandum of understanding ensures the PCPS to conduct surveys and providing the necessary administrative statistics to measure the desired results, and support the follow-up and evaluation team in developing and executing methods of collecting and analyzing data.
- **Evaluating Interventions:** the General Administration of Planning and Policies will identify action plan to evaluate a number of projects and interventions conducted by the partners in the plan jointly with all concerned parties. This is expected to ensure feedback and documenting lessons, especially those related to changing hypotheses and contributing at achieving the joint vision “combating corruption”. There are other interventions involved in reviewing and developing legislations, raising-awareness, code of conduct, incorporating the activities of enhancing the integrity and combating corruption system in the institutions, enriching the schools and universities’ curricula, and capacity-building for those concerned.
- **Reports:** periodical reports and the important outputs of the monitoring and evaluation system, which provides information for all of those concerned in the strategy, especially decision makers. Issuing professional reports and circulate them to those concerned in a timely manner and form contributes in achieving the pursued objectives of the system. Therefore, the Commission will provide semi-annual and annual reports on the progress in achieving the desired results through the General Administration of Planning and Policies, under the oversight of the national team.



### 5.3 Results Measurement Indicators are the basis of the follow-up, evaluation, accountability and learning.

Results	Measurement Indicators
Result 1, adopting the legislations that enable the anti-corruption environment	1. A number of legislations or articles in the legislations enabling the anti-corruption. The Environment that was adopted or amended based on the recommendations of the relevant commission, institution, committee and coalitions.
Result 2, the organizational oversight instruments and structures in the institutions are activated	2. A number of implemented activities by the Commission directly related to the preventive measures, and to raising awareness about the anti-corruption and integrity system and the number of participants in them.
	3. Public opinion makers realize that the preventive measures related to combating corruption have improved, especially the role of the internal monitoring, quality, complaints and the gender units, as well as the improvements on the role of the Commission in its preventive works.
	4. The number of internal monitoring units in the governmental institutions and units complied with issuing annual reports about the results of their work.
	5. The number of the quality, complaints and gender units in the public governmental institutions and units that presented annual reports about the results of their works.
Result 3, Employees in institutions, and the citizens are protected from getting into corrupt acts.	6. The percentage of citizens that pointed out that favoritism and nepotism are not in line with the religious, cultural nor national values, and that they are crimes.
	7. The number of measurements that were set to activate the codes of conduct in the sectors adopting them.
Result 4, the public institutions efficiently participating in the efforts set forth to enable the anti-corruption and integrity system in the relevant sectors.	8. The number of activities and interventions that were included in the relevant sectoral and cross-sectoral plans to enable the anti-corruption and integrity system in the relevant sector.
	9. The number of published annual reports that explain the level of improvement in achieving the goals the results of the sectoral and cross-sectoral plans, all categorized according to the provided sector.
Result 5, the educational curricula in the educational institutions that were included in the anti-corruption and integrity system.	10. The number of courses of activities that were adopted by the school curricula that are relevant to the anti-corruption and integrity system, categorized according to age groups and specializations.
	11. The number of universities and colleges that adopted courses or chapters relevant to the anti-corruption and integrity system, divided to the school year and specializations.
	12. The percentage of students in schools and universities and society members that had the knowledge on corruption and the ways to combat it, and who were ready and took

Results	Measurement Indicators
	the responsibility of combating it.
Result 6, national, local, women and youth based and social initiatives that are active in holding the duty-bearers accountable	<p>13. The percentage of the increasing social accountability initiatives and the participants in it from the civil society and public sectors that were implemented, divided to sectors.</p> <p>14. The percentage of the increasing numbers of persons in the society ready to report on corruption suspicions or to volunteer in social activities to enable the anti-corruption and integrity system.</p>
Result 7, media and public opinion makers are professionally active in setting afoot the effort to combat corruption.	<p>15. The percentage of increasing relevant news and published reports via visual, audio and printed media to anti-corruption and integrity system. The percentage of the growing numbers of the media agencies and institutions that publish periodical reports and news about the matter.</p> <p>16. The percentage of increasing numbers of investigative reports active in publishing relevant material, and are relevant to combating corruption. The percentage of the increasing numbers of media professionals and the media institutions that publish related investigative reports.</p>
Result 8, civil society institutions that are involved in the efforts set forth to enable the anti-corruption and integrity system	<p>17. The number of civil society institutions that are active in enabling the anti-corruption and integrity system, the number of institutions that adopted related activities and the number of participants in them.</p> <p>18. Interested public opinion makers and experts point out that the performance of the role of civil society institution along with the social activists has improved on the local level in terms of the efforts to combat corruption.</p>
Result 9, the Palestinian legislative system that bolsters law enforcement and is in line with the international conventions about combating corruption.	<p>19. The number of articles that were added, amended or omitted in the sanctions law and the Anti-Corruption Law to enable law enforcement and to trace corrupt persons in line with the UNCAC.</p> <p>20. The number of articles that were added, amended or omitted from the Penal Procedure Law and the Anti-Corruption Law in terms of the procedures of investigations and trial proceedings before the law enforcement bodies.</p> <p>21. Interested public opinion makers and experts in combating corruption point out the compliance of the relevant bodies with applying the system of protecting the reporters, witnesses and experts according to the system adopted. They also pointed out the improvement in the trial procedures, especially the quick pace of closing files.</p>
Result 10, the quality of evidence-gathering, investigations and litigation by the law enforcement institutions	<p>22. The number of procedures and measurements adopted by the law enforcement institutions to foster the quality of evidence-gathering, investigations and litigation.</p> <p>23. The judges, lawyers, prosecutors and experts point out the improvement of the quality of evidence-gathering, investigations and litigation by the institutions of law</p>

Results	Measurement Indicators
	enforcement.
Result 11, the society's trust in the capabilities of the institutions of law enforcement and reporting on corrupt acts	24. The percentage of the growing trust of the society in the capacities of the law enforcement institutions and their seriousness in tracing the corrupt works; categorized according to the work field, work sector, work place, gender, age and geographical region.
Result 12, the judicial, regional and international cooperation is efficient.	25. The number of cases where the corruption offences' revenues and finances were recovered and the number of fugitive offenders presented to the Palestinian Justice.
	26. The number of international and regional conventions in all fields of combating corruption and enabling integrity that were signed and the implementation measure were set in regards to them.
	27. The number of trained and qualified cadres in the Commission to work in the international and local cooperation
Result 13, the State of Palestine is active in the relevant regional and international conventions, networks and commissions to combat corruption and exchange knowledge with them.	28. The number of conventions, networks and initiatives on the regional and international levels that Palestine has joined, and had a lead role in.
	29. The number of workshops, bilateral and multilateral meetings the related institutions to the anti-corruption and integrity system had participated in.
	30. The number of Palestinian experts that participated in trainings, providing consultancy works or presenting paper forms to other states.