PACC Strategy

2023-2021

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ANTI-CORRUPTION COMMISSION
PACC
Palestine
فلسطين

The Commissioner Foreword:

The Palestinian people entitled to competent professional institutions, which are befitting to its great sacrifices. Those sacrifices were made throughout a harsh and long course since over a century, throughout which the Palestinian people shed blood, suffered the diaspora, the yoke of occupation represented in uprooting us from our land, detaching us from our ambience, culture and its development context. The Palestinian Authority undertook the task of building a national institutions and creating its legal system since its establishment and even before the return of the Palestinian leadership from diaspora.

Following these efforts, the Anti-Corruption Commission was established in accordance with Law-by-Decree No. (7) Of 2010 amending the Illicit Gain Law No. 1 of 2005 and its amendments. The law provided for the establishment of an Anti-Corruption Commission and its Commissioner was appointed in 2010, followed by the acceding of UNCAC in 2014. The Commission was tasked with jurisdictions in pursuant with the Law. The commission approved three national strategies, two of which were implemented, and the national cross-sectoral strategy for integrity and anti- corruption 2020-2023 is under implementation with the national partners, for whom we extend our thanks for their cooperation with the commission during our course in spreading the concepts of transparency, integrity and anti-corruption.

The experience and lessons learned underlined during the past decade of the life of the Commission and its accumulated experiences the importance of separating the national strategy and the Commission's strategy. The National Strategy is participatory in nature, which the Commission contributes to implement with other official, civil and private institutions. In addition to coordinating and managing joint efforts. Whereas, the Commission's strategy, which is based on completing the construction, institutionalization and internal governance processes that have been carried out, support the efforts of the success of the national cross-sectoral strategy for integrity and anti-corruption.

We with pride, announce here and now the strategy of the Commission, which has been approved for the first time since its establishment. This strategy is the result of experiences and internal efforts in the Commission, and a participatory work contributed by all its departments and units, which contributed to its enrichment with a summary of lessons learned from previous experiences, along with the best recommendations in accordance with successful international experiences, standards and best practices.

While we are aware of the current challenges and difficulties that they may constitute obstacles in the way of implementing this strategy. However, we in the Anti-Corruption Commission adopt this important and pivotal document in the Commission's journey. We are all together, with resolve and determination to put it into practice and adhere to its policies, objectives and outputs, because of our firm conviction that it constitutes a major building block on the path of construction and progress.

Allah who bestows success

Commissioner of PACC

Raed Mahmoud Radwan

1. Introduction:

The successful planning process rests on an accurate diagnosis of the challenges and threats to the work environment, the role and tasks of the institution that it was established to achieve. In addition, it depends mainly on reviewing previous plans and strategies to draw lessons in order to include clear work mechanisms to address them in the new strategy.

PACC began the strategic planning process for the period 2021-2023, in early February 2021, on the condition to end during the first half of the same year to form the road map and vision that the new leadership of the institution will carry during the coming period. It was also taken into consideration that the Commission's plan and "the national cross-sectoral plan for integrity and anti- corruption" are consistent with the national planning framework. Based on the decision of the Council of Ministers to extend duration of all sectoral and cross-sectoral plans, besides the Council of Ministers extended the validity of the national policy agenda for another year until the end of 2023. The Commission ensured to include preventive tools and interventions, promotion of integrity and the fight against corruption in national sectoral and cross-sectoral plans, strategies, and in the upcoming national policy agenda.

The National Anti-Corruption Strategy was previously prepared twice; (2012-2014) and (2015-2018); Once again, a National Cross-Sectoral Strategy for Integrity and Anti- Corruption in 2019 was prepared to cover the period 2020-2022[1] .

The Commission's leadership has deemed the importance of completing its own strategy with the aim to focus on building the institution and its governance and developing its capabilities to become more capable and appropriate to lead national efforts in promoting integrity and combating corruption. Accordingly, it achieves its vision and mission, enjoys the trust and respect of the Palestinian people, which is *the first component of the strategy* on one hand. On the other, ensuring the fulfillment of the Commission's obligations and responsibilities in the prevention and promotion of integrity and anti-corruption values, which is established in the National Cross-Sectoral Strategy for Integrity and Anti-Corruption, or the daily responsibilities and functions assigned to the Commission by law as a *second component* of the Commission's strategy.

2. Strategy Preparation Methodology:

Taking into consideration the lessons learned from the Palestinian and international experiences; the Commission has been keen to ensure that this plan responds to a number of necessary requirements for its success, including the following:

1. The plan considers the Palestinian citizen his rights, dignity and money are the focus of its work and attention. As well as the plan seeks to provide the best possible performance, in a manner that meets the aspirations of citizens in a corruption-free state in which Palestinians live in prosperity and dignity, based on the fact that combating corruption is a basic requirement and supportive of the national liberation project.

[1] Based on the decision of the Council of Ministers, all sectoral and cross-sectoral plans in the country have been extended for another year due to the Corona pandemic that the state institutions experienced, to end in the year 2023

2. The plan covered the Commission's main action fields, as promoting integrity values, preventing corruption and combating it, prosecuting and litigating its perpetrators characterizes the Commission's work. Consequently, it requires building and developing the Commission's capacities, working on ensuring employing the proficient capacities in accordance with its organizational structure. In a manner, serve the implementation of this plan; fulfill the Commission's commitments and responsibilities within the framework of the national cross-sectoral plan for integrity and anti- corruption.
3. The plan benefited from the available literature, previous plans, lessons, recommendations, internal and external reviews, and from the cross-sectoral national plan for integrity and anti- corruption. Moreover, the plan realized the importance of strengthening the Commission's capabilities to meet the requirements for the success of the national plan, which has been taken into account and translated into goals, results and activities. In addition to, review the Commission's annual achievements reports for the years 2019 and 2020 in the aim of improvement, development and identify the aspirations and directions of the Commission's employees. As well, assess the extent of their contribution to achieve the national cross-sectoral strategy.
4. The plan focused on improving the performance of the Commission. In addition to highlight managing the financial and administrative aspect of the Commission's work in line with the applicable Palestinian laws and with the best international practices in this regard, therefore the Commission becomes a model institution and an example in institutional work.
5. The plan was keen to be an effective tool that serves the achievement of strategic goals in order to achieve the desired results, as it focused on:
   - Completing the process of institutionalization and governance of the Commission.
   - Supporting, enabling and enhancing the operational capabilities of the Commission.
   - Building the capabilities and skills of the Commission's employees, raising their efficiency, increasing their effectiveness, and enhancing their affiliation.
   - Institutionalizing and strengthening the cooperative and complementary relationship of the Commission with other partners

6. A theoretical framework for the plan was adopted, represented in "the theory of change", and employed the results-based planning approach was used as a methodology that serves the process of analysis and formulation of goals and results.
7. Two contemporary approaches have been adopted, which are now being incorporated as conceptual frameworks in the planning processes of institutions, namely:

    - The Human Rights Based Approach: since justice, development and combating corruption are among the human rights affirmed by international conventions.
    - Inclusion of gender issues: importance will be accorded to the process of including gender issues in this strategy by allocating a basic outcome to address it in a way that ensures the achievement of success and tangible impact in its implementation.

Taking into account that the region is going through a state of political instability because of the occupation. In addition to the consequences of the Corona pandemic and its repercussions on all sectors, there was a need to pay special attention to consider scenarios and identifying potential risks.

8. The procedural course of the planning process approved the work methodology on adopting the following foundations:

- Participatory planning: a technical team was formed from the Commission to prepare the strategy, which worked to involve all the Commission's employees and the largest number of stakeholders in the planning process.
- Defining the mission of the Commission, setting its vision, policies and strategic objectives, as well as defining the measures governing implementation, determining success factors, extracting long-term and medium-term results and outputs, and setting key performance indicators.
- Environment analysis according to SWOT analysis, and using BESTLE external environment analysis model.

Thus, the analysis of the external and internal environment, the direct environment of the Commission was conducted. Opinion polls, reports, documents and related studies were accorded special importance in the review process.

3. Analysis of the work environment, challenges and opportunities

3.1 The Commission's functions and powers*:*

Law-by- Decree No. 7 amending the Illicit Gain Law, issued in 2005 by the Legislative Council, as it was amended in line with the public interest and the international requirements and agreements, so that the State of Palestine endorsed its first anti-corruption law, and established the Anti-Corruption Commission in 2010. The law stipulated the establishment of an anti-corruption body and its Commissioner was appointed in 2010. The amended law also stipulated the formation of a seconded prosecution (later it became a "specialized prosecution") and a court specialized in corruption crimes, which is part of the High Judicial Council and is specialized in considering cases referred to it by the Public Prosecution Office. It is worth mentioning, there is an advisory board appointed by the Commissioner to provide advice to the Commissioner in the work presented to the board.

According to the law, the Commission is entrusted with the following responsibilities and competencies:

1. Receiving all complaints, reports and case files related to corruption, and then conducting searches, investigations, inquiries, verification, and referring them to the (specialized) Public Prosecution, so that the Prosecution will refer them to the Corruption Crimes Court after completing the files and verifying the existence of corruption suspicions.
2. Drawing up public policies, developing strategies and plans at the national level, including the cross-sectoral national strategy for integrity and anti- corruption, besides the exerted efforts to implement them in partnership with the relevant authorities.
3. Implementation of awareness campaigns in order to work on changing the attitudes, culture and behavior of society to be more responsive to acts of corruption and thus are motivated to report it.
4. Receiving, keeping and examining financial disclosure statements for a large number of persons, as specified in the law.
5. Enhancing the values of integrity and preventive measures to prevent corruption in the various institutions.

6. International cooperation and exchange of experiences in accordance with international and Arab agreements.

3.2The most important achievements and successes:

The Commission was able through its efforts and in cooperation with the Public Prosecution and corruption crimes court, official partners and civil society institutions to enforce the anti-corruption law and take preventive measures to reduce corruption rates within the Palestinian society. In addition to recovering sums of money, assets and real estate in amounts under judicial provisions in accordance with legal principles.

1. Over the past years, the Commission has been able to achieve many successes, including: Amending the Anti-Corruption Law, the legislative and legal framework supporting it in line with the International and regional convention against corruption and best practices.
2. Employing and engaging Palestinian expertise - whether individual or institutional - and benefiting from it in anti-corruption efforts (preparing national and sectoral plans and strategies, bilateral anti-corruption agreements, training and awareness raising).
3. Building partnerships and enhancing means of communication and coordination with partners in order to ensure the programmatic sustainability of its work, as it has built relationships, cooperation and integration with many relevant parties and made efforts with those parties, especially with civil society institutions, the media and educational institutions.
4. The Commission leads the national efforts to combat corruption, where it led the preparation and implementation of the national anti-corruption strategy of 2012-2014 and a second strategy for the years 2015-2018. In addition to participating in preparing a set of complementary and supportive strategies including: the media strategy of the Anti-Corruption Commission In 2019, the justice sector strategy, the strategy of the Palestinian Youth Network Active in Combating Corruption in 2014, the preparation of women's strategic directions to combat corruption in Palestine in 2017, in cooperation with civil society institutions. Finally, the preparation of strategic directions to enhance integrity, transparency and combating corruption in the Palestinian sports sector, as well as leading a participatory approach in the process of preparing the national cross-sectoral anti-corruption strategy for the years 2020-2023.
5. Membership of the Commission in international and regional forums and networks, and occupying advanced positions in them.

3.3 The Commission's work environment*:*

The main reliance was on the analysis of the external environment and the in-depth direct environment included in the national cross-sectoral anti-corruption strategy for of 2020-2023 and the supporting efforts to strengthen oversight, accountability and combating corruption.

Moreover, this strategy focuses on building the Commission, its institutionalization and governance, raising the capabilities of its staff to enhance its institutional and professional capabilities to become a model professional institution on the one hand. On the other, continue to fulfill the requirements entrusted to it by the law, UNCAC and the national cross-sectoral strategy for integrity and anti-corruption. However, the external environment and the immediate environment related to analyzing the reality and efforts to enhance integrity at the national level is not neglected, and more focus has

been placed on analyzing the internal environment of the Commission itself. As per the Commission's competencies, its organizational structure, regulations, laws and bylaws governing its work were considered, in addition to the analysis of the human resources environment in the Commission.

This has enabled access **to identify the challenges of the immediate environment and the internal environment - strengths and weaknesses** -, which were subsequently taken in the process of strengthening and institutionalizing the internal structure**.**

3.3.1 The reality of integrity and combating corruption in Palestine*:*

The presence of the Palestinian Anti-Corruption Commission is very important, especially in light of the efforts of national liberation, as this reality requires great efforts to confront the challenges related to corruption (fighting it, drying up its sources, eradicating it and prosecuting the corrupt). The Commission was established as a requirement and entitlement to the anti-corruption law, in addition to the need to focus follow-ups on corruption cases in Palestine with one specialized body and to play a vital role in preventing and strengthening the values of integrity and principles of transparency to curb the spread of corruption in Palestinian society.

In recent years, Palestine has witnessed growing trends in the institutionalization of integrity and anti-corruption operations, taking advantage of regional and international trends in this field. It is possible to monitor the ongoing institutionalization in the institutions of the State of Palestine regarding integrity, governance and anti-corruption, which will increase citizens' awareness of the efforts of the Commission and its partners in promoting an environment that repels corruption**.**

The **continuation of the Israeli military occupation** of the State of Palestine and its aggressive policies in the West Bank, Jerusalem and the Gaza Strip have impeded the complete control of the Palestinian National Authority over all the lands of the State of Palestine. Subsequently, it weakened the ability of the Commission to reach some areas and prosecute the corrupt fleeing to it.
The absence of the Legislative Council has led to an increase in the Commission's burdens in reviewing policies and legislation and strengthening national efforts in integrity and anti-corruption issues, including supporting the independence of the Commission and its efforts in promoting integrity and prosecuting corrupt.

Within the same context, the **political division** has led to the lack of legal jurisdiction of the anti-corruption law on the southern governorates and for the commission's activity in the southern governorates to be limited to providing some awareness programs through its partners from NGOs and some universities.
The acceptance of the State of Palestine as an observer member in the United Nations enabled Palestine to accede to UNCAC in 2014. Then to upgrade its representation from the status of an observer member to a full member in the Convention, which enabled the Commission to benefit from international cooperation in raising capacities, exchanging information, prosecuting the corrupt and recovering money looted.

The Commission is aware that inaccurate perceptions of the extent and level of corruption are ambiguous with a large and different set of influences that are not related to corruption itself. Nonetheless, they are related to other issues such as political division and the confusion between mismanagement and neglect, in addition to political and social structures, unemployment and poor

economic and living conditions; Impressionistic corruption is considered the biggest challenge facing the commission, as well as other peer institutions in many countries**.**

3.3.2 Opportunities and threats in the environment surrounding PACC:

3.3.2.1 Opportunities:

The review and analysis inferred to a set of opportunities in the environment surrounding PACC, which if properly invested, will serve the process of upgrading the institutionalization and governance of the Commission and developing its performance to a more effective level in the national efforts to combat corruption in general, and the efforts of the Anti-Corruption Commission Corruption in particular. Among these opportunities are the following:

1. **International and Arab Level**
    - International recognition of Palestine's membership as an observer member state in the United Nations and consequently its accession and ratification of international conventions and treaties, especially the United Nations Convention against Corruption, the Arab Convention against Corruption.
    - Membership of the Commission in many forums, networks and international and regional organizations and the signing of a large number of memoranda of understanding and international cooperation.
    - The existence of an international and Arab tendency to combat corruption, consequently the presence of international and Arab partners that support the work of the Commission and a great possibility to benefit from their successful experiences, and the support of a number of international organizations for anti-corruption efforts in Palestine.
2. **Local Level:**
    - Having a political will to combat corruption and political and national support at the highest levels for the Commission's efforts
    - Restoring national unity and parliamentary life, and its possible repercussions on the inclusion of the mandate and the Commission's work on institutions in the southern governorates.
    - Positive relations, cooperation and partnership with law enforcement institutions, civil society institutions and the media.
    - Existence of a national, cross-sectoral, participatory plan to enhance integrity and combat corruption.
    - The government is growing interest in integrity, transparency and anti-corruption issues. It is represented in the Council of Ministers recent introduction of the Integrity, Transparency and Anti-Corruption Sector Working Group. Increasing the community's awareness of corruption and its destructive effects on development and the priority of combating it, and being more prepared to engage in efforts to combat it through reporting and participating in the activities of implementing the national cross-sectoral strategy to promote integrity and fight corruption.
    - Community calls for the adoption of the Right to Information Law in Palestine.
    - A budget allocated for a new building with technical equipment and infrastructure that meets the necessary requirements and needs.

3.3.2.2 The threats:

In exchange o opportunities, there are a number of threats in the general environment, which should be paid attention to in view of their negative effects on anti-corruption efforts:

1. **Political Level:**
   - The Israeli occupation of the Palestinian lands in the West Bank and Jerusalem, the spread of Israeli checkpoints between the governorates, the division of the Palestinian lands into areas - A, B, and C - which impede efforts to combat corruption and prosecute the corrupt.
   - The possibility of continuing to disrupt the democratic process, especially in Jerusalem and the Palestinian areas, which are fully controlled by the Israeli occupation authorities.
   - The occupation obstacles represented in preventing the jurisdiction of the Palestinian government over the areas of East Jerusalem.
   - The political division and its repercussions on the overall anti-corruption process in Palestine and the absence of anti-corruption efforts in the southern governorates

2. **Social Level:**
   - The perception of widespread corruption and a lack of confidence in the serious action to combat corruption and hold its perpetrators accountable.
   - The general willingness of the Palestinian citizen to report suspicions of corruption is still insufficient due to the restrictions and societal culture.

3. **Legislative and Oversight Level:**
   - The absence of the Legislative Council and the consequent absence of its legislative and oversight role.
   - Failure to complete the approval and review of some legislations that enhance anti-corruption efforts

4. **International Level:**
   - The weak international coordination and judicial cooperation in the field of extradition and the recovery of criminal proceeds.
   - A further decline in international financial support for the government's budget, and consequently the inability to provide the financial Commission’s commitments and budgets, as well as the budget for implementing the national cross-sectoral strategy for integrity and anti-corruption.
5. **Local Level:**
   - The long litigation procedures for issuing judgments in corruption cases in both of appeal and cassation stages.
   - The uneven effectiveness of the parties implementing the national strategy in implementing the agreed plans and including them within the parties' strategies, and the weak participation of the private sector and cooperative societies in the efforts to implement the national strategy.
   - Weak enabling and supporting media environment for national efforts to combat corruption.

- Weak budgets necessary to finance all the programs and projects of the Commission in general and the failure to transfer financial allocations on regular dates.
- Palestinian libraries lack specialized studies on transparency, integrity and combating corruption

3.3.3 The Commission's Internal Environment:

1. Organizational Structure and Competencies

The Commission is specialized in the following **main work of field**:

1. Law enforcement and prosecuting the corrupts
2. Corruption prevention and raising awareness
3. International cooperation in the field of combating corruption

:

In order to carry out its functions, a new organizational structure for the authority was prepared and approved, which included the position of deputy and advisors, according to which the administrative bodies were divided into main administrations and units, support administrations and units according to the following:

First: the main administrative bodies:

1. The general administration of complaint, reports and inquiry
2. The general administer
3. ation of investigation
4. The general administration of planning and policies
5. The general administration of integrity and corruption prevention
6. Witnesses, whistle- blowers and experts protection unit
7. Financial disclosure statements unit
8. Legal affairs unit
9. International and local cooperation unit
10. Gender and human rights unit

Second: the supportive administrative bodies

11. The Commissioner Bureau
12. The general administration of administrative and financial affairs.
13. Internal oversight unit
14. The general administration of information technology.

2. Employment:

The Commission has expanded during the previous years, mainly in the last two years, as the number of staff doubled due to the increase in the Commission's activities and the expansion of its circle of interest. Nonetheless, this does not mean that the Commission has fulfilled all its needs regarding the staff. This requires the expansion of employment with approved and specialized plans in the field of

capacity raising and empowerment through integration programs or continuing education to provide the Commission with cadres that have specialized skills.

3. Gender and Human Rights:

Despite the Commission's, legacy of public awareness of gender and human rights standards and principles. It did not adequately reflect gender and human rights issues in its policies. Therefore, the Commission needs to complete efforts to integrate gender and human rights issues in its policies, plans, work programs, budgets, and in its work as a whole. In addition to including these issues in national strategies and plans, and encourage initiatives that show gender as an agent of change by participating in the community's involvement in efforts anti-Corruption. In order to move forward, the Commission will:

- Strengthening the principles and culture of gender and human rights within the Commission, and integrating its criteria, starting from developing the strategic framework for interventions, to designing, implementing or evaluating programs and projects.
- Develop policies and programs with the aim of bridging gender gaps to ensure that men and women benefit equally from these programs in order to prevent and combat corruption and enhance integrity, in order to contribute to achieving sustainable development goals (SDGs), specifically SDGs number 5+16.
- Completing the gender audit process and integrating gender issues in the Commission's policies, procedures, plans and budgets, and developing reports showing progress in implementing the gender audit recommendations.

4. Human development and capacity building

The Commission does not have a specific plan to assess training needs, and there is an absence of training opportunities and development based on recommendations of performance evaluation or bridging this gap through fulfilling the commitments of the national cross-sectoral strategy. Consequently, it leads to working on developing and adopting effective mechanisms to identify training needs and link them with training plans and performance management objectives. Hence linking them with the career path for each employee, involving a larger number of employees and job levels in training, including specialized topics that fit the needs of the Commission's staff, and adopting effective mechanisms to organize and control external training.

5. The Regulations and instructions regulating the Commission's work

The Council of Ministers in its Resolution no. (7) Of 2011, provided a regulation for the employees of the Anti-Corruption Commission to regulate their work. There are bylaws (instruction) attached to this regulation issued by the Commissioner. Those bylaws are related to accommodation on the salary scale, staff time, overtime, and allowance for official travel missions, violations and penalties, performance evaluation and promotions, awarding bonuses, a code of conduct for the Commission's employees. The need to review regulation and the bylaw issued pursuant thereto emerged through the actual application. This review is to ensure their comprehensiveness and effectiveness. Moreover, the system of performance evaluation, appraisals, incentives and penalties must be developed and combined in a unified, coherent and integrated system. In addition, the performance management approach must be adopted instead of performance appraisal, which positively reflects on the effectiveness of employees and achieving goals the work.

6. The Commission's Internal Operations

Upon completion of the Commission's investigation, inquiry and gathering inferences in complaints and reports that are within its jurisdiction and found strong suspicions of committing one of the corruption crimes mentioned under the provisions of the Anti-Corruption Law. Accordingly, the file shall be referred to the Public Prosecutor by virtue of a referral decision issued by the Commissioner, pursuant to the provisions Article (21) of the Anti-Corruption Law.

The same applies to the General Administration of Planning and Policies, where it still needs a sufficient number of qualified professionals to follow up on the large tasks entrusted to it. Especially in the areas of internal evaluation and follow-up or at the level of following up the performance indicators of the national cross-sectoral strategy for integrity and anti-corruption.

The technological developments taking place at the global level dictate a change and modification in the Commission's capabilities of and legislation to become in coherence with the reality of electronic crimes. This coherence is required as other forms of corruption have emerged, developed and advanced in the use of criminal tools, which necessarily calls for upgrading anti-corruption activities in Palestine to the level of technology and information systems employment and make use of them in working systems with maximum capacity.

It is worth noting that the Commission's leadership has adopted the principles of total quality through the instructions issued by it to all departments and units to review and develop their current procedures, conduct an analysis of risks related to quality and bribery, and prepare preventive and remedial measures in partnership with the Standards and Metrology Organization. It is expected to complete a unified procedures manual for all the Commission's operations by the end of this year.

7. Information Systems and Software

The Commission needs to invest extensively in the automation of all its transactions, especially in the areas of follow-up, evaluation, archiving, financial disclosure statements, inquiries, investigation and financial analysis. In addition to its need for interconnection with the competent authorities to access databases that facilitate, speed up and maintain the confidentiality and privacy of work, with the need to pay attention to securing the authority and its systems with high-level protection programs. The Commission also needs to develop its website, use all technological means and social networks, manage them efficiently and professionally, not counting the need to establish an electronic forensic laboratory to detect corruption crime

8. The Financing Model and the Budget

It is important for the Commission to allocate budgets for programs, while relying on the general budget to the maximum in implementing its programs and activities so as not to be dependent on projects, programs and the will of funders. Along with the need to provide the international and local cooperation unit with specialized and efficient staff to raise funds, follow up with financing parties and develop their capabilities. The Commission works within a financing policy approved to provide a dedicated percentage of its budget and the allocated budget for implementing the national cross-sectoral strategy for integrity and anti- corruption to the programs. Bearing in mind that the Commission's budgets for previous years have been audited by external legal auditors, and are published in the Commission's

annual reports to enhance its financial transparency through public display, a practice that the Commission deems as important to maintain its continuity.

9. Internal Communication and the Decision Making Mechanism:

- The internal communication operations in the Commission still tend to be considered conventional in nature, with efforts being made to develop them and the tendency to link them to modern information technology mechanisms.
- The collective leadership model is considered one of the most effective and best leadership methods. The Commission in this regard is moving towards implementing and adopting this method in leading its work, relying on delegation and participation in the decision-making process. This model can be supported by capacities building to work as a team, participatory management and spreading a culture based on collective leadership linked to the limits of organizational powers and responsibilities.

10. Physical Structure:

In the field of the physical structure, the Commission needs to improve the state of its physical work environment, in terms of adequate spaces, entrances and halls, keeping files and information, ensuring the confidentiality of investigations and the general environment, which must be included in the new building of the authority when moving to it.

11. Planning, reporting, follow-up and evaluation system.

The Commission needs an advanced system for reports based on its plans and measurement indicators. The absence of an effective system for follow-up and evaluation is linked in a professional and good manner with an effective system for reports and performance indicators depriving the Commission of effective oversight and follow-up. This is due to a number of reasons, including the lack of a database that can be used in the areas of planning, setting base values for performance indicators and evaluating the work of the Commission as outputs, results and impact. The follow-up and evaluation system at the Commission will also provide a set of tools that will help Commission's management to follow up on its programs in a way that ensures the achievement of its desired results.

3.2.4 The Commission's Strengths and Weaknesses:

3.2.4.1 The Commission's Strengths*:*

It can be concluded that, and within the context of the development of its work in the field of anti-corruption, the Commission has been able to accumulate and distinguish the following strengths that can be invested and built upon in its future efforts:

1. A Palestinian institution operating under a special law and legislation in the fight against corruption, the amended Anti-Corruption Law No. (1) Of 2005 and its amendments.
2. A Palestinian institution with a legal personality, financially and administratively independent, that operates without influence or interference from any party.
3. An institution supported by a specialized prosecution to work with, and a competent court to consider corruption crimes.
4. The Commission has distinguished relations with international and Arab anti-corruption institutions and networks.
5. The Commission's membership in international and Arab anti-corruption conventions.

6. Distinguished relations with law enforcement institutions, civil society organizations, and media organizations.
7. A budget allocated by the state to support the activities and expenditures of the Commission.
8. The Commissioner is characterized as a strong personality and a prestigious position, respected by all parties, and committed to the commission's goals and national issues.
9. A young and efficient staff that works hard and is committed to the goals of the Commission and national issues.

3.2.4.2 The Commission's Weaknesses:

Despite it is distinguished by above-mentioned strengths, it needs to address and tackle issues that are considered weaknesses to ward off their negative impact on its efforts, including:

1. There is a need to amend the Anti-Corruption Law, in addition to approve a package of other supporting legislations.
2. The Commission's inability to work in the southern governorates.
3. The need to develop a number of administrative, financial and technical procedures and manuals for the Commission.
4. The lack of effective implementation of the approved structure and the resulting presence of some overlap or ambiguity in understanding of some powers.
5. The Commission has a need to be supported with some experts and specialized technical staff.
6. Absence of a specific written training plan and capacity building for the Commission.
7. The absence of an effective system for follow-up and evaluation at the internal level and at the level of the national plan.
8. The need to complete the exerted efforts to build a quality management system, anti-bribery, and an internal audit system based on a quality system in the Commission.
9. Absence of strategic and annual planning and review for the Commission.
10. The budget is neither prepared nor disbursed in a program-based manner.
11. The spread of negative impressions about the extent of corruption "Perceptive Corruption" and the confusion between corruption and other types of mismanagement and negligence, and some questioning the efforts made by the Commission in the field of combating corruption.
12. The absence of an information resource center.
13. There is a need to enhance internal communication between public administrations and units in the Commission.

4. Action Priorities and Framework of Desired Change:

The Commission considers that promoting integrity and combating corruption is a comprehensive national process that requires the participation of all, whether official institutions, civil society, the private sector, educational institutions, academics, politicians, and all the capabilities and forces of society. This process cannot take place without the presence of a strong anti-corruption body that has the necessary capabilities and expertise to coordinate and manage the national efforts represented by the national cross-sectoral strategy to enhance integrity and combat corruption

The Commission deems appropriate to harmonize the process of institutionalizing the Commission, its governance and developing its capabilities with the great national tasks it undertakes under the Anti-Corruption Law and UNCAC. This harmonization without neglecting the great efforts that have been made in the field of building and institutionalizing the Commission. However, all of this has become

insufficient with the increased sensitivity of citizens towards corruption issues, and the need for a model institution capable of combating corruption and restoring citizens' trust in it by prosecuting the corrupt, recovering looted funds and preventing impunity.

The Vision:

An independent, effective and influential professional body that enjoys the confidence of the community.

Mission Statement:

An independent national institution that leads national efforts to combat corruption to protect society and public fund from the dangers of corruption, to prosecute its perpetrators, and to promote the principles of transparency, the values of integrity, good governance, and the presence of Palestine in international forums.

The Commission's Policies and Strategic Objectives

The Commission's Policies and Perspectives:

The Commission seeks to achieve its vision and mission statement through the implementation of the policies and competencies provided by the Anti-Corruption Law and international agreement acceded by Palestine;

The Commission considers that its main tasks and tools stem from law enforcement, awareness raising, preventive measures and international cooperation, all of which revolve around the guarantees and objectives of "prevention **of impunity;"**

In order to achieve this lofty goal**, the Commission's policies are based on two main themes:**

The first theme: a strong, capable and exemplary anti-corruption commission in its construction and the effects of its work.

Successful international experiences in combating corruption agree upon the importance of having strong and capable competent bodies to follow up and coordinate national efforts in promoting integrity and combating corruption. Given that, the participants in this process are many bodies that have their competencies and tasks, and that fighting corruption may constitute one of them and not the majority of them, which requires the existence of an operations center to manage and direct this task, and vice versa as well. Countries and experiences that established formal bodies and did not provide them with the support, capabilities and tools necessary to make their efforts successful and enhance their credibility and citizens' trust in them, or those countries that ignored the importance of having a body or body competent to coordinate and manage national efforts to combat corruption have failed.

This theme is based on four main policies:

The first policy: a political will that support the efforts of the Commission in enhancing integrity and combating corruption, its independence in undertaking its jurisdictions and competencies in compliance with the law. The Commission believes that this supporting political will is one of the most important reasons that lead to its success. Moreover, the Commission considers that this supporting political will along with national unity, and an elected active Legislative Council, is one of the most important means of support, accompanied with providing an atmosphere and a professional work environment in through a political system based on separation and integration between the three powers.

The second policy: a modern and effective law that empowers the Commission and provides it with the necessary tools and means to achieve its goals in accordance with the best international standards and best practices.

The third policy: the strategies and plans of the Commission are dealt with seriousness, competently, as it is not enough to have the best strategies and plans if they are not accompanied by the availability of will and to harness all the capabilities and resources for the successful implementation of these strategies and plans.

The fourth policy: The work of the Commission enjoys the trust, respect and support of the Palestinians. The Commission's ultimate goal is to serve the Palestinians and their national goals, because enhancing integrity and combating corruption serves the Palestinian people's project of liberation from occupation and enhances citizens' confidence in the leadership and increases their involvement in the struggle, and contribute to strengthening the steadfastness and prosperity of the Palestinian people.

The second theme: promoting integrity, transparency and combating corruption is collective responsibility.

The Commission believes that promoting integrity and combating corruption is a national responsibility that all components of society should engage in. The Commission cannot alone nor do any institution or even groups of institutions achieve this without the involvement of all institutions and societal forces supported by the political will and the necessary resources. Within the same framework, the Commission depends on the principle that everyone is equal before the law, and that there is no immunity for the corrupt, and believes in the principles of transparency and dealing seriously and respectfully with all partners.

This theme is based on the pillars of three main policies:

The fifth policy: An approved participatory national strategy that enjoys the support and the political will for its success. This includes a detailed implementation plan, clear tasks and an effective framework for follow-up, evaluation, accountability for all those involved in the tasks of implementing the strategies, in addition to providing and harnessing the necessary support, resources and budgets, in addition to including the national strategy within strategies, programs and plans of all national partners and actors.

The sixth policy: Citizens are equal (no one is above the law and there is no immunity for the corrupt), as the commission does not discriminate in its follow-up to complaints, cases and suspicions of corruption, and does not give any consideration except to the law.

The seventh policy: Openness and presence at the local and international levels. This policy stems from the Commission's deep belief that it does not function alone, and cannot succeed without establishing real partnerships. This cannot be achieved without openness; law stipulates enhancing transparency within the limits of what is included in best practices. In addition to giving people space and listening to them and their complaints and dealing with them with all seriousness and competence.

Courses of Change and Strategic Goals

The main objectives/themes focus on building and strengthening the Commission and making it a role model in the field of institutional building, rationalization, leanness, independence, effectiveness and sufficiency. Taking into account that all the objectives and themes proposed below affect, are affected by each other, and serve if each of them achieves the other objectives. The building, strengthening the institution and following the highest levels of transparency and integrity in appointments and public tenders in all its forms, as contained in the first objective, will serve to achieve the second objective and increase people's confidence in the institution.

It is important to note that the strategic construction for the next period of the life of this strategy has been based on two main aspects. The first is concerned with completing the process of building, institutionalizing and governing the Commission, empowering its staff, and raising their capabilities to achieve the goals and tasks for which the Commission was established. Foremost of which is leadership and coordination of national efforts in the areas of enhancing integrity, prevention, law enforcement and international cooperation. The second aspect relates to the tasks, competencies and daily work of the Commission, in addition to leading efforts to implement the national cross-sectoral strategy for integrity and anti- corruption through the national team. In addition to implementing the Commission's commitments contained in the national matrix of the strategic plan, participation with the competent authorities and the relationship to carry out some tasks, or follow-up in case the implementation is entirely for partner competent authorities**.**

First course of change: An Effective and Efficient Institution

The first strategic objective: a solid model institutional structure, independent, effective and efficient performance

Approach: The Commission's functions and powers, institutional and organizational structure, applicable work procedures will be reviewed and evaluated. This review will have a focus on the need to enhance the cadre's capabilities and efficiency to ensure that they are accommodated according to specialization to ensure maximum utilization of the available capabilities. The work to remove any conflicts or overlaps in powers in the event they are found, and work will be carried out in the best, fastest way and the least resources in order to preserve public money (Value for Money). Make maximum use of modern technology and automation work for the departments and tasks of the Commission to ensure strengthening the institution's structure and promotion of affiliation in accordance with effective systems for internal and external communication. Clear evaluation, follow-up and standards measuring performance and impact then linking it to achievement and reward. The Commission will seek to build effective systems for continuing education in various fields and benefit from serious training programs at the local and international levels.

Results Framework

Medium Term Outcomes/Areas of Change	Outcomes
1.1.: An institutionalized and governed work environment.	1.1.1. job profile table, completed and adopted job description cards 1.1.2 Completed and activated financial and administrative regulations and instructions that are clear and precise. 1.1.3 Procedures manuals are approved and implemented forms. 1.1.4 A developed organizational structure that is activated and responsive to the requirements of the strategy. 1.1.5A suitable work environment. 1.1.6Clear mechanisms and channels of external communication. 1.1.7A performance monitoring, evaluation and control system is in place. 1.1.8Active systems for quality and risk management in the Commission. 1.1.9Institutionalized and effective observatory. 1.1.10Policies, instructions and procedures that led to an optimal use of financial resources. 1.1.11An approved and implemented operational plan. 1.1.12A reward system that stimulates productivity and excellence. 1.1.13approved purchase plans..
:1.2Competent employees who are able to achieve goals.	1.2.1A completed study to assess the capabilities and needs of human resources. 1.2.2An active new employee training program. 1.2.3Accredited Continuing Education Program. 1.2.4Position occupancy and promotions is based on equal opportunity and merit. 1.2.5Human resources are used efficiently and effectively (putting the right employee in the right place).

	1.2.6Knowledge updates are explained and localized. 1.2.7An updated Code of Conduct is in effect.
1.3Exemplary performance based on best standards and practices.	1.3.1The business and operations of the Commission are fair and transparent. 1.3.2A system for complaints about the Commission's services and decisions is activated. 1.3.3People's satisfaction with the services provided is polled and taken into consideration. 1.3.4Citizens' priorities are monitored and taken into consideration. 1.3.5The Commission applies the Program Budget. 1.3.6The programs and plans were based on the results management approach and the theory of change. 1.3.7Internal control is effective. 1.3.8The Gifts and Conflict of Interest Disclosure Regulations are circulated and enforced. 1.3.9An institution open to external oversight and accountability. 1.3.10The findings and recommendations of the self-evaluation in accordance with UNCAC and the reviews are present and are of interest. 1.3.11Effective and enforceable quality and anti-bribery standards and measures.
1.4 Automated/computerized institution.	1.4.1Monitoring and management systems for the Commission's departments and units are complete, effective, and safe. 1.4.2The Commission is enabled through various external databases. 1.4.3Information security management policies, plans, and programs are documented, approved and activated. 1.4.4Modern programs and means of communication are integrated into the work. 1.4.5Investigation Department is equipped with modern technological investigative tools.

	1.4.6Automated programs to follow up on strategies and plans. 1.4.7A computerized program to manage the work of the various committees. 1.4.8Automated central archive. 1.4.9A computerized quality and bribery risk management system.
1.5: The commission is responsive and sensitive to gender and human rights issues.	1.5.1Gender audit completed and recommendations implemented. 1.5.2The procedures for receiving and following up on complaints, investigations, inquiries and protection are gender sensitive. 1.5.3The Commission's procedures took into account gender, human rights and dignity. 5.1The impact and influence of corruption on gender is monitored and circulated. 1.5.5The impact and influence of corruption on human rights is monitored and circulated. 1.5.6The rights of people with disabilities are taken into account and applied. 1.5.7Human rights are present in the Commission's policies and integrated into plans and programmes.

The second course of change: Credibility and Changing Impressions

The second strategic objective: An institution that enjoys trust, credibility and access to citizens

Approach: The commission will work to enhance the positive impressions of citizens about the national efforts it leads to enhance integrity and measures to prevent corruption. Simultaneously, the commission will work to deal with the unrealistic impressions of citizens regarding the belief that the widespread corruption in all sectors is "**perceptive corruption**", the confusion between acts of corruption and other types of negligence or mismanagement, administrative weakness and laxity, and the prevailing belief in the semblance of efforts being made to combat corruption.

In the same context, the Commission will follow up on local and international opinion polls and will pay them attention, consideration and deep analysis. It will seek to increase confidence in the Commission and the seriousness of national efforts in the field of combating corruption and not tolerating it, through effective and efficient communication mechanisms, address people in a confident, honest language and reaches them at all places and levels. The Commission will provide information

to citizens about its work and achievements (without harming the rights of those suspected of committing a corruption crime). Moreover, it will work to build institutional and serious programs for community partnership with relevant civil society institutions, the media, the private sector and the academic sector to increase access to citizens, and grassroots institutions operating outside city centers will pay special attention.

Results Framework:

Medium Term Outcomes/Areas of Change	Outcomes
2.1: The Commission is able to address the citizens and reach them.	2.1.1A realistic and implemented media policy and strategy. 2.1.2Trained and qualified staff who professionally dealt with the media and **citizens** of all levels (an official spokesperson for the Commission). 2.1.3Professionals are trained and empowered. 2.1.4The staff is coherent and has clear, simple, impactful messages and a unified discourse. 2.1.5The commission discourse is published and circulated. 2.1.6Opinion makers and influencers engaged in awareness raising. 2.1.7A new expressive and impressive visual identity. 2.1.8The Commission's website and social network are professionally managed. 2.1.9Preventive awareness programs are professionally prepared and managed.
2.2: The Commission is transparent and open to civil society institutions and the media.	2.2.1An effective framework for engaging civil society in the implementation of the national strategy. 2.2.2Partnership and communication with media professionals and journalists is based on clear and effective mechanisms. 2.2.3A disaggregated database and the mechanisms for obtaining information are clear and public, in a manner that does not conflict with the confidentiality of information. 2.3.4Specific press releases for public opinion.
2.3: Effective systems to measure the influence and draw lessons.	2.3.1Opinions and impressions are monitored, documented and taken into consideration.

	2.3.2A structured framework for managing and measuring knowledge creation and structured thinking. (**Educated Institution**). 2.3.3 An effective monitoring and evaluation system. 2.3.4Annual strategic review and significant lessons and lessons. 2.3.5An organized framework for measuring and monitoring the results of administrative decisions.

The third course of change: Strengthening Integrity and Prosecution

The third Strategic Objective: An effective body capable of promoting integrity, preventing opportunities for corruption, and prosecuting and holding the corrupt accountable.

Approach: The work of the Commission is not limited to prosecuting the corrupt after they have committed acts of corruption, but the principle is to investigate through means, including the development and institutionalization of the observatory, the preparation of specialized studies, especially with regard to studies of corruption risks in sensitive sectors, in addition to investigations and investigative reports. Moreover, through following up with complaints and reports, cases tracking with the specialized prosecution and at the Corruption Crimes Court. The Commission also drawing lessons from successful experiences and best local and international practices; taking the necessary preventive measures, specific targets and suggestions to fortify institutions, whether public sector institutions, local bodies, civil society and the private sector to reduce corruption opportunities.

The Commission will work to promote the values of integrity and principles of transparency in public institutions, especially those related to the protection of public money and the public interest. It will develop its capabilities and institutionalize its work internally and with the concerned authorities in the Council of Ministers, the Ministry of Justice, and the Fatwa and Legislation Bureau, in the field of reviewing legislation within the framework of the harmonization processes it responds to and the international and regional convention.

The Commission will build an effective system to follow up on the implementation of the national cross-sectoral anti-corruption strategy, through institutionalizing the work of the national team for planning, follow-up and implementation. Given that, it is a national responsibility and mission that is not limited to the role of the Commission only, rather than it is binding on all parties, within the framework of a mutual accountability process.

Results Framework:

Medium Term Outcomes/Areas of Change	Outcomes
3.2: Efficient preventive measures	3.1.1Operational plans and sector targeting priorities are effective. 3.1.2Reports related to indicators of integrity and transparency are monitored and taken into consideration. 3.1.3The results of complaints and reports affected the priorities of targeting immunization. 3.1.4The Commission is able to follow up on recommendations and results with the specialists
3.2: A supportive and institutionalized national legal framework.	3.2.1Mechanisms for legal review of national legislations to ensure integrity, combat corruption and align them with international conventions are institutionalized in the Commission. 3.2.2Clear mechanisms for implementing the whistleblowers, witnesses and experts protection regulation. 3.2.3Coordination mechanisms between law enforcement agencies are framed.
3.3: Extensive involvement in efforts to enhance integrity and combat corruption.	3.3.1National partnerships are effective and institutionalized and serve comprehensive national efforts. 3.3.2The methods of submitting and receiving complaints and reports - known and anonymous - and requests for protection are multiple, effective, easy, and safe. 3.3.4Communications links with subject entities are defined and disciplined.
3.4: The National Anti-Corruption Strategy Followed-up and its management mechanisms are institutionalized	3.4.1The monitoring and evaluation system is automated and effective.

	3.4.2The next national strategy is aligned with and included in the national strategies, the national policy agenda and the national strategic planning framework. 3.4.3The national team for the implementation of the national strategy is institutionalized and effective. 3.4.4Efforts have been exerted with the strategy parties, the competent authorities and the financiers to secure budgets.

The fourth course of change: Momentum in Carrying out Missions and Leading National Efforts to Enhance Integrity and Combat Corruption

The fourth strategic objective: The Commission efficiently implements its commitments within the framework of its competencies and responsibilities, and those contained in the national cross-sectoral strategy to combat corruption.

The approach: the Commission focuses most of its efforts and strategic energies for the coming period in the field of institutionalization and governance, and the development of internal capabilities to be able to play the role entrusted to it. It realizes that strengthening the values of integrity, fortifying national institutions, preventing and combating corruption cannot be given a truce or a period of rest until Commission builds and develops its capabilities. The Commission attaches great importance and has allocated to it most of the previous three goals[2]. The issue that prompted the Commission to allocate this goal to ensure the implementation and follow-up of the tasks entrusted to it by virtue of responsibility and competence. As well as follow-up on the implementation of the national cross-sectoral strategy for integrity and anti- corruption in general through its leadership of the national team on supervision to implement the strategy.

In particular, the Commission will work to ensure the implementation of its obligations and responsibilities within the national strategy by including them in its strategy, to ensure the provision of budgets, the implementation of activities and follow-up on them within the system of monitoring, follow-up and evaluation that it seeks to build and institutionalize. At the same time, the Commission will follow up and ring the bell for joint activities that the Commission is not responsible for implementing or in the event of activities that will be implemented entirely by competent authorities without the participation of the Commission.

[2] The commission kept the same formula adopted by the national cross-sectoral strategy to enhance integrity and combat corruption for the main interventions (here they fall under the "outputs" framework, since the commission is responsible for achieving them), while realizing that the formulation of the outputs of this strategy is different so that there is no confusion.

Results Framework

Medium Term Outcomes/Areas of Change	Outcomes
4.1: The national legal framework promotes prevention and prevents corruption.	4.1.1Regulations for receiving gifts and conflict of interest are in place.[3] 4.1.2Implementation of the corruption risk analysis method for the subject entities, especially the service-providing ones .[4] 4.1.3Awareness and training programs for employees in institutions on transparency, accountability and related laws in the fight against corruption.[5] 4.1.4Preparing and adopting the National Integrity Document that limits the possibility of corruption occurring in the different stages of the public procurement process .[6] 4.1.5Support research centers, post-graduate studies and scholars to conduct research, studies and dissertations in the areas of the integrity and anti-corruption system in various sectors.[7] 4.1.6An annual forum for exchanging experiences and information on the plans, programs and interventions of the work of the relevant institutions in strengthening the integrity system and combating corruption.[8]
4.2: The Palestinian society is aware and engaged in anti-corruption efforts	4.2.1Inclusion in educational curricula in schools and universities of the concepts of the integrity and anti-corruption system.[9] 4.2.2Implementation of a training program to enhance the knowledge and methods of teachers and supervisors in the field of concepts of the integrity and anti-corruption system .[10] 4.2.3Supporting the initiatives of students in schools and universities and enhancing their concepts and awareness of the causes and effects of corruption[11].

[3] Intervention 3 of result 1 in the national strategy.
[4] Intervention "10" of result "2" in the national strategy.
[5] Intervention 13 of result 3 in the national strategy.
[6] Intervention "15" of result "3" in the national strategy.
[7] Intervention 18 of result 4 in the national strategy.
[8] Intervention 19 of result 4 in the national strategy.
[9] Intervention "24" and "25" of result "5" in the national strategy.
[10] Intervention "26" out of result "5" in the national strategy.
[11] Intervention "27" out of result "5" in the national strategy.

	4.2.4The programs and plans of civil society organizations include activities and interventions that enhance the integrity and anti-corruption system in various sectors.[12] 4.2.5Civil society institutions are qualified and trained through the efforts of the Commission.[13] 4.2.6Awareness and educational electronic materials addressed various groups . 4.2.7 Various media highlighted the Commission's work and achievements. 4.2.8Published success stories. 4.2.9Basic concepts simplified and explained to citizens. 4.2.10The Discourse of the Commission is published and circulated. 4.2.11Opinion makers and influencers engaged in raising awareness . 4.2.12Quality press statements and briefings for public opinion. 4.2.13Gender and youth are empowered and active.
4.3: Enforced law and prosecution prevent impunity	4.3.1 Review the Penal Codes, the Anti-Corruption Law and the Criminal Procedure Code to strengthen law enforcement .[14] 4.3.2Follow-up of the work, application and circulation of the system for the protection of whistleblowers, witnesses and experts.[15] 3.3.3Develop the efficiency of human resources in law enforcement institutions, and enhance their financial capabilities.[16] 4.3.4framing coordination mechanisms between law enforcement agencies, in particular the police, security services, the Public Prosecution and the judiciary.[17] 4.3.5Capacity building of law enforcement institutions regarding related media to corruption files

[12] Intervention "36" out of result "8" in the national strategy.
[13] Intervention "38" out of result "8" in the national strategy.
[14] Intervention 39 of result 9 in the national strategy.
[15] Intervention "40" of result of "9" in the national strategy.
[16] Intervention 41 of result 10 in the national strategy.
[17] Intervention 42 of result 10 in the national strategy.

	[18]. 4.3.6Allocating journalists to cover corruption cases at various stages and providing the necessary capabilities to carry out their tasks to the fullest.[19]
4.4: Effective international cooperation:	4.4.1Activating and followed-up conviction decisions in corruption cases, requests for extradition, mutual legal assistance and the recovery of criminal proceeds with the relevant international bodies.[20] 4.4.2Framing and activating relations in the field of regional and international judicial cooperation in a single national template that ensures its effectiveness in cooperation with the relevant authorities.[21] 4.4.3Seeking to join regional and international forums, networks and initiatives.[22] 4.4.4Programs concerned with exchanging expertise and technical assistance between Palestine and regional and international bodies related to combating corruption.[23] 4.4.5Memoranda of understanding and bilateral and multilateral agreements in force in the field of raising Palestinian capabilities.

5. Measures necessary to ensure implementation of the strategy

The Commission believes that the goals of success and reaching those goals aspires to, will not be achieved by just having a strong and clear strategic document. However, through the adoption of it by the male and female workers and their efforts to make it a success first, and then providing the will and harnessing the capabilities by the leadership of the institution and its higher bodies in favor of efforts to implement the strategy.

In order to put the strategy into practice, a number of main measures should be taken:

1. **Direct towards the formation and institutionalization of the "higher leadership" team** to supervise the implementation and ensure the operation of all the tracks as they are interconnected and all of them are considered essential entrances to the success of the other tracks.

[18] Intervention "43" of result score "11" in the national strategy.
[19] Intervention "44" of result "11" in the national strategy.
[20] Intervention "45" of result "12" in the national strategy.
[21] Intervention "46" of result "12" in the national strategy.
[22] Intervention "48" of result "13" in the national strategy.
[23] Intervention "49" of result "13" in the national strategy.

2. Explain the strategy, the hoped-for change paths and simplify them for all the Commission's staff, besides work to develop and circulate an internal discourse that is consistent with the vision and achieving the goals.
3. Review the organizational structure and job description cards, complete the unfinished cards, and ensure the effectiveness of the structure, its ability to reach the achievement of strategic goals efficiently and effectively.
4. Do what necessary to conduct a periodic annual strategic review - during the implementation period of the strategy - in the last quarter of the year. During which the work environment, the achievements made, the obstacles encountered in implementation, and the need to make any amendments to the strategic plan to keep pace with any emerging facts that were not taken into account previously, are reviewed. In addition to reviewing the executive plan and operational plans for the next year and amending them according to evaluation, follow-up, and lessons learned from the implementation experience in the past year.
5. Seek with the official competent authorities to provide the necessary budgets and capabilities to implement the strategy**. It is significant here for the Commission to seek to adopt a clear financing policy that meets the financing needs and priorities, through mobilizing funds, writing financing projects and their reports, following up with funders, and following up on the implementation of projects with the utmost professionalism and internal coordination with the concerned parties of the Commission.**
6. Build a strategic partnership and effective mechanisms framed with the official parties related to the implementation of the anti-corruption law. Furthermore, working together to develop institutional and national integrative capacities on the basis that these institutions are supportive and complementary to each other's efforts. The law enforcement operations can succeed only through joint work, institutional coordination and with the presence of collective experience and capabilities.
7. Develop effective mechanisms to strengthen and institutionalize partnership and openness to civil society and the media to serve the achievement of the Commission's strategic plan and the national cross-sectoral plan for integrity and anti- corruption .
8. Determine the required training needs, experiences and examining the areas of benefit locally, Arab and internationally in developing the capabilities of the Commission's staff.
9. Establish a system and mechanisms for accountability for the implementation of the Commission's strategy, and develop mechanisms to link the results of the strategy's implementation to the performance evaluation of public administrations and, consequently, the Commission's employees.

6. *The Monitoring, Follow-up and Evaluation System is a Priority*

The Commission needs to adopt an effective system of monitoring, follow-up, evaluation and learning, that includes a clear, declared and binding plan for accountability, reports, information flow and feedback, and also includes an annual review of the achievements, challenges, suggestions, lessons, lessons learned and amendments to the next year's plan.

Conceivably, it is important to note that the follow-up and evaluation system aims to enable management to direct the institution towards the desired change path, and to enhance accountability for the efficiency and effectiveness of implementation, and the institution's commitment to its vision, mission, values and goals that it seeks to achieve.

For the purpose of building an effective monitoring and evaluation system, the Commission should take a number of measures according to the following:

1. Availability of conviction and will on the part of the Commission's leadership, which the existence of an effective system for monitoring, follow-up, evaluation and learning in the institution is a basic strategic task accompanying the Commission's direction in investing in construction, institutionalization and governance to achieve the goals of the institution. The first expression of the availability of this will lies in strengthening and developing the Commission's staff in **the field of follow-up and evaluation.** In addition to providing support and assistance for those responsible for the development and management of the system in order to influence staff to implement what is upon them to make the system succeed. For the reason that all monitoring and evaluation activities are at the core of their work, if they are continuously trained on dealing with the system, reviewing and developing it.
2. Involve stakeholders in developing the system by providing the necessary tools and time to implement the meetings and consultations aimed at reviewing and agreeing on the expected outputs and indicators, on a baseline, and on the quality, method and sources of information collection.
3. Attention to the fact that the follow-up and evaluation system is in constant development and needs unremitting review and development, in addition to the annual review in order to follow up the achievements, progress and learning within the framework of a comprehensive knowledge management process within the institution .
4. Institutionalizing the monitoring and evaluation system, determining who uses the system, the type of information they need, the information flow model, the monitoring and evaluation matrix for the system, the sources and tools for collecting information, who collects data and when (quarterly, semi-annual, annual, etc.). A detailed guide that contains policies, forms and steps for sources and means of collecting information, in addition to monitoring, documentation and information management, periodic, annual and special reports to be issued by the system, the content of each report, roles and responsibilities in the organizational structure and the development needs necessary for implementing the system.
5. A set of indicators that measure the general performance of the authority will be adopted, in addition to a set of indicators that measure the change in the medium-term results.

Indicators for measuring the overall performance of the Commission:

Indicators	Sources and means of verification
1. The percentage of increase in confidence in the Commission's efforts to combat corruption.	Annual survey of a representative sample.
2. The percentage of increase in confidence in the independence of the Commission and its inability to be affected by external pressures and interventions.	Annual survey of a representative sample.

Indicators for measuring medium-term results

Medium term result	Indicators	Sources and means of verification
1.1: An institutionalized and governed work environment.	The Commission's team, local and international partners, and the advisory board refer to the clarity and effectiveness of work mechanisms in the change paths and priorities.	Interviews with experts, partners and members of the advisory board.
1.2: Competent employees who are able to achieve goals.	The number of training days and the number of trainees carried out by the institution's team internally and externally. Increase of the number of reports prepared by the Commission's staff. Increase and speed in the completion of complaints. The number of complaints from the Commission to the prosecution and from the prosecution to the judiciary. Employee satisfaction rate.	Annual training report. Monitor reports, studies and papers. Internal statistics. Annual internal survey.
1.3 Exemplary performance based on best standards and practices.	The percentage of citizens' satisfaction with the general performance of the Commission.	Annual survey of a random sample.
:1.4 Automated/computerized organization.	The number of systems and programs that have been approved and started to be used. Speed rate in completing transactions and follow-ups	Internal statistics.
1.5 The Commission is responsive and sensitive to gender and human rights issues.	Number of recommendations adopted and implemented by the Commission from gender audit.	Internal annual monitoring report.

Medium term result	Indicators	Sources and means of verification
2.1The Commission is able to address the citizens and reach them.	Percentage of followers/viewers of the Commission's websites. The number of media events that dealt with the Commission and its work. The number of topics mentioned in the Palestinian curriculum related to the role and functions of the commission.	Annual report for daily monitoring and documentation.
2.2 The Commission is transparent and open to civil society institutions and the media.	Satisfaction of partners in civil society and the media about the work of the Commission and its transparency.	Interviews with a sample of specialists and stakeholders.
2.3 Effective systems to measure impact and draw lessons.	The institution's leadership is satisfied with the effectiveness of the evaluation and follow-up system and the quality of the reports issued by it. The number of recommendations that have been taken into account in the evaluation processes and drawing lessons.	Interviews with the leadership of the institution.
3.1 Efficient preventive measures.	Number of recommendations adopted by stakeholders in the field of prevention and immunization. Number of participants in awareness-raising training on corruption crimes and related regulations. Results of evaluation of exercises, trainers and training materials.	Annual monitoring of studies and follow-ups. Training reports. Training reports.
3.2 A supportive and institutionalized national legal framework.	Satisfaction of whistleblowers and witnesses with protection measures.	Annual monitoring. Interviews with stakeholders.

Medium term result	Indicators	Sources and means of verification
	The speed, effectiveness and clarity of the mechanisms and roles in harmonizing and approving laws.	
3.3 Extensive involvement in efforts to promote integrity and combat corruption.	The level of partners' satisfaction with the Commission's follow-ups and relations with them. Percentage of complaints and reports received by the Commission from different sources. The number of women, youth and people with special needs who participate in the Commission's activities.	Interviews with a number of key partners. Annual internal monitoring. Annual monitoring and documentation.
3.4 The National Anti-Corruption Strategy Followed-up and its management mechanisms are institutionalized.	Follow-up reports on strategy implementation are available. The national strategy is included in the national strategies and policy agenda. The percentage of securing financial resources for the implementation of the strategy.	Quarterly and annual monitoring and evaluation reports. Study/review of national strategies and policies. Follow-up with the Council of Ministers, the Ministry of Finance, funders and national partners.
4.1 The national legal framework enhances corruption prevention.	Percentage of knowledge of gift-receiving systems and conflict of interest. The percentage of filling out the financial disclosure declaration. Citizens' satisfaction with the way public services are managed.	A survey of a random sample of public sector employees. Internal monitoring of the Commission. A survey of a random sample.

Medium term result	Indicators	Sources and means of verification
4.2 The Palestinian society is aware and engaged in efforts to combat corruption.	Number of curricula in which integrity and anti-corruption values are included. Number of civil society institutions whose plans and programs included activities and interventions that promote integrity and combat corruption. Citizens are aware of the concepts and laws of combating corruption.	Annual monitoring and documentation. Annual monitoring and documentation. Annual survey of a random sample.
4.3 Enforced law and prosecution prevent impunity.	The rate of speed in completing corruption cases. Satisfaction of law enforcement agencies with the level of coordination and follow-up with the Commission.	Annual monitoring. Annual interviews with stakeholders.
4.4 Effective international cooperation.	The value of proceeds and proceeds of crime from the looted funds. Number of beneficiaries of international training programs.	Annual monitoring and follow-up. Annual monitoring.