



State of Palestine

**National Anti-Corruption Strategy
2015-2018**

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Executive Summary

This strategy was prepared in light of a comprehensive review of the previous national strategy and in light of information collected through various studies, surveys and events carried out by implementing stakeholders and other parties. It was prepared with full cooperation of Palestinian expertise and with an active participation of all implementing stakeholders.

This strategy was drafted under continued Israeli occupation of the State of Palestine, an occupation that has continuously proved by statement and practice that it does not recognize the Palestinian people, its rights, its land and its homeland.

The strategy relies first and foremost on the Palestinian Anti-Corruption Law No. 1, 2005 (amended). It takes into consideration the Palestinian institutional structures, with special attention to anti-corruption law institutions. The strategy regards the Palestinian Legislative Council (PLC) an integral implementing stakeholder in spite of its absence whilst implementing the previous strategy.

The implementation period of the previous strategy has witnessed Palestine's gaining international recognition as a non-member observer state at the United Nations, followed shortly by Palestine's accession to UNCAC, in addition to its accession to the Arab Convention for Combating Money Laundering and Terrorism Financing and the Arab Convention to Fight Corruption. This strategy derives its powers from these agreements in addition to the amended Anti-Corruption Law No. 1, 2005.

Relevant studies reflect the adequate efforts made toward achieving the vision of a corruption-free Palestine, there was a level of various achievements in terms of prosecution, law enforcement, corruption prevention, community awareness, education and participation, capacity building, regional and international cooperation. Other efforts are still necessary to continue to raise awareness and promote preventive measures, and expand enforcement of the law, given its effect on public confidence with relevance to efforts of combating corruption.

The principle of concentrating national efforts is a key on which strategy's message relies by implementing policies that form the backbone of the fight against corruption. Thus, the strategy steps from the threshold of basic principles: Human Rights, the Palestinian culture that rejects corruption, in addition to PACC's responsibility to lead and coordinate national efforts to combat corruption. The strategy is very comprehensive, as it includes stakeholders from various sectors including official governmental bodies, institutions, civil society organizations and the private sector.

The proposed strategic plan of action is set to implement this strategy's goals under the following focus areas:

- Prevention of corruption.
- Law enforcement and prosecution.
- Awareness raising, education, training and community participation.
- International cooperation.

The strategy will be monitored and evaluated in accordance with the set standards, clarified earlier, to be the basis to success for all stakeholders. The M&E factor will include but will not be limited to: formation of technical and consultative committees, and reviews done by external bodies.

Introduction

Corruption in its broad meaning is the main factor that causes development efforts to fail and sustains poverty. Under corruption, the state will have diminished ability to achieve its development goals with relation to citizens' wellbeing, equality, justice and rule of law, because corruption consumes a major share of resources allocated to development programs. It also undermines citizens' confidence in government's efforts, hinders honest and fair competition and aggravates poverty and unemployment.

To eliminate corruption, there is a need to develop and implement effective anti-corruption policies and procedures aimed at raising community awareness of its hazards, instituting corruption prevention measures, and holding those involved in corruption accountable. In 2012, strategy stakeholders, headed by the Palestinian Anti-corruption Commission (PACC) launched a 3-year national anti-corruption strategy, which was the first in this respect since the creation of the Palestinian National Authority (PNA) in 1994. During its implementation, several needs have been identified, which are addressed by the second strategy for the period 2015-2018.

In developing this strategy, the PNA has paid attention to the need to engage the different social groups and segments in the development and implementation for two main reasons: the first is to prevent corruption and expose its hazardous effects, and the second is to expose corruption and prosecute perpetrators, taking into account our role at the regional and international arenas. Therefore, the implementation of the strategy requires developing a set of plans of action ensuring coordination and concerted efforts by the different official agencies, civil society organizations and all bodies engaged with oversight and accountability.

The evaluation report on the implementation of 2012-2014 strategy pointed to the enormous efforts made to engage the largest possible number of institutions concerned with preventing and combating corruption by implementing hundreds of interventions that would enhance the status of Palestine within the international transparency landscape. Many of these efforts were successfully accomplished and others are still undergoing towards achieving the vision of a corruption-free Palestinian society, despite the ongoing Israeli occupation and the resulting fragmentation of the West Bank, Gaza Strip and Jerusalem.

The strategy in the Palestinian context

The Israeli occupation is the primary and main source of corruption

This strategy was developed while the Israeli occupation of the State of Palestine is still ongoing. This occupation has demonstrated by words and acts that it does not recognize the Palestinian people and their homeland and rights, and that its ultimate goal is to appropriate the entire Palestinian territory, employing a policy of corruption and depravation to achieve its goals. Hence it is natural to see that the occupation and the corrupt are on the same side, proving the notion that occupation and corruption are two sides of the same coin.

Despite obstacles imposed by the occupation to hinder the implementation of national strategies and plans, the State of Palestine and all Palestinian institutions exert all possible efforts towards state building and national planning. Hence this strategy properly reflects the political will expressed by the President of the State of Palestine and the Prime Minister in various official and public events. The strategy is in line with the views of official and grassroots organizations about combating corruption in Palestine, which were expressed in meetings that brought together several partner organizations.

The basic contents of this strategy are derived from the amended anti-corruption law No 1 of 2005, taking into consideration the relevant institutional structure in Palestine, particularly institutions mandated to enforce the anti-corruption law. The Palestinian Legislative Council (PLC) is considered an integral part of strategy stakeholders, despite its absence throughout the previous strategic period.

The strategy in the international and regional contexts

The United Nations Convention against Corruption (UNCAC), which was endorsed by UN General Assembly in 2003 and entered into force in 2005, is the first global legal instrument for combating corruption. The convention sets out preventive measures state parties are required to adopt whether in terms of policies and practices or in terms of administrative, financial and judicial procedures to prevent corruption in the public and private sectors. In addition, UNCAC calls for the creation of national institutions tasked with the prevention and prosecution of corruption and supports international cooperation, technical and financial assistance in the prevention of and fight against corruption and in the promotion of integrity, accountability and proper management of public property.

The previous strategic period has witnessed international recognition of the State of Palestine as a non-member state with observer status in the UN. This was followed by Palestine's accession to the UNCAC, which has marked a breakthrough at the international level towards the building of the State of Palestine. The accession reflects an international recognition of the Palestinian anti-corruption efforts and commitment to align all relevant legislations with the requirements of the UNCAC, particularly anti-corruption laws, the penal code, public procurement, budgets, civil service and all other laws regulating parties addressed by the anti-corruption law to ensure their compliance with the principles of transparency, integrity, accountability and anticorruption.

Since Palestine's accession to this convention in May 2014, several stakeholders in the implementation of the previous national anti-corruption strategy have benefited from UN-supported exchange of experiences in anticorruption. Palestine has received increased technical assistance from the UN Office on Drugs and Crimes (UNODC) with regard to combating corruption. In view of this accession, Palestine will benefit from enhanced access to international cooperation and exchange of legal assistance with UNCAC state parties, as well as cooperation in the extradition of offenders and recovery of proceeds of crimes. In fact, the previous strategic period has witnessed recovery of over USD 70 million and the first extradition of an accused of corruption crime who managed to flee the Palestinian territory.

At the regional level, in December 2010, Arab states signed the Arab Convention for Combating Money Laundering and Terrorism Financing and the Arab Convention to Fight Corruption. The latter consists of 35 articles, addressing the scope of corruption and listing the types of acts and crimes it entails. Articles in the Convention required that criminal trials and the related penalties should be according to domestic laws of each state, laying out conditions for bringing such crimes to court. The provisions also addressed means to prevent corruption.

The Arab Convention also stressed the importance of encouraging the engagement of civil society organizations in anti-corruption efforts, while reaffirming the independent status of oversight and control authorities, the judiciary and prosecution. State parties are also encouraged to find ways to revoke any contracts or franchises resulting from corruptive acts and to protect whistleblowers, witnesses, experts and victims of corruption crimes.

The Convention addressed ways of cooperation between state parties to enhance the effective application of anti-corruption laws and exchange of judicial assistance. It also regulated cases of judicial and criminal prosecution and extradition of offenders, as well as measures and controls for recovery of assets and proceeds of crimes. Particular attention is paid to creating training programs for staff and those responsible for fighting and detecting corruption crimes, as well as the collection, exchange and statistical analysis of information related to corruption.

As a result of efforts exerted by several Arab and international organizations, Palestine has benefited from a regional program that has continued throughout the previous strategic period. The Palestinian engagement with the program ranged from requesting activities that respond to Palestine's specific needs, such as holding several workshops on the anti-corruption strategy and self-assessment, to sharing the Palestinian anti-corruption experience with other Arab countries and building the capacity of law enforcement institutions in the implementation of the national anti-corruption strategy.

The meaning of corruption

Article 1 in the amended anti-corruption law No. 1 of 2005 states:

The following shall be considered corruption for the purposes of implementing this law:

1. Crimes prejudicial to the duties of the public office and to public trust as provided for in the applicable penal code.
2. Crimes emanating from money laundering as provided for in the money laundering law.
3. Any act prejudicial to public funds.
4. Abuse of authority contrary to the provisions of the law.
5. Acceptance of nepotism and favoritism which eliminates a right and achieves falsehood.
6. Illegal gains.
7. All acts provided for in the Arab and International conventions against corruption ratified by the PNA or to which it is party.

Strategy preparation methodology

The development of this strategy required a comprehensive review of the previous national strategy. External resources were contracted to conduct a review and evaluation of the National Anti-corruption Strategy 2012-2014. The findings and recommendations were employed in the development of this strategy.

In the implementation of the previous strategy, a large number of national, sectoral and district level meetings were held to identify and record public perceptions and views about anti-corruption efforts, which were used in determining priorities for this strategy. In addition, surveys, polls and studies were conducted at the national and sectoral levels, engaging the sectors of women, youth, civil society, local government, external grants and the efforts of the Corruption Crime Court (CCC). Furthermore, PACC carried out a comprehensive review of its activities to help analyze the internal and external environments and allow this strategy to target new sectors or other sectors that have been overlooked by the previous strategy. The National Development Plan (NDP) 2014-2016 provided the basis for developing the outline and setting the directions for this strategy.

As was the case with the previous one, this strategy was developed by Palestinian experts and professionals with wide participation from various national institutions and civil society. In line with the amended anti-corruption law No. 1 of 2005, PACC provided overall management of these national efforts. The strategy was drafted by PACC staff, a number of experts and professionals and PACC Advisory Board, which is composed of members with renowned expertise and competence.

Vision

A Palestinian society free of corruption based on integrity, transparency and accountability.

Mission

Concerted national efforts to fight corruption and eliminate its features in Palestinian society by implementing policies that serve as the backbone in detecting sources of corruption, addressing its causes, preventing it and limiting its occurrence; promoting a community culture that rejects corruption; and cooperating with local, regional and international bodies to take the necessary actions to prevent and eliminate corruption and prosecute its perpetrators.

Main purpose of the strategy

In essence, the national strategy on anti-corruption aims at limiting opportunities for corrupt practices by developing a legal and procedural framework for strengthening the principles of integrity, transparency and accountability in compliance with the amended anti-corruption law

No. 1 of 2005 and the UN and Arab Conventions against Corruption; enhancing preventive measures and preventing the practice of corruption with the participation and cooperation of all state institutions, civil society organizations, the private sector, and Arab and international organizations; and enhancing the effectiveness of and public trust in institutions responsible for the enforcement of the anti-corruption law and relevant oversight institutions.

Strategy's basic principles

- Based on the State of Palestine's jurisdiction over the entire Palestinian territory occupied in 1967, this strategy entails the prosecution of corruption crimes inside and outside the Palestinian territory.
- All parties involved in the implementation of this strategy shall seek to promote respect of human rights of every citizen.
- All parties involved in the implementation of the strategy shall respect the independence of the judiciary and citizens' right to a fair trial.
- Anti-corruption efforts are based on the strengths of Palestinian culture that rejects corruption.
- Palestinian citizens are entitled to the principles of integrity, equality, justice, equal opportunities, and effective and equitable access to public services.
- National duty requires every citizen to counter corruption and to report any case of corruption that he/she may become aware of to PACC.
- Combating and preventing corruption is a joint responsibility lead by PACC with the participation of all parties subject to the anti-corruption law.
- The effective implementation of the anti-corruption policy requires that coordination of implementation efforts is channeled through one body – PACC.

Analysis of internal and external environment

Analysis of the internal environment

I. Strengths

- A serious political will to combat corruption.
- The Palestinian anti-corruption law is valid and active.
- Formation of a national consensus government to end the split between the West Bank and Gaza Strip and the possible implications of this step on anti-corruption efforts in Gaza.
- A national development plan that reflects the government's serious intention to enhance transparency and accountability and fight corruption.
- Finalization of the institutional and administrative structure of institutions responsible for the enforcement of the anti-corruption law and enhanced experience of their management and staff.
- An independent commission authorized to develop the national anti-corruption strategy as well as the required mechanisms and plans for its implementation, to lead the system and assume responsibility for coordinating the roles of the different stakeholders.

- General mandates and authorities granted to PACC by the anti-corruption law, enabling the commission to assume its responsibilities in preventing corruption and prosecuting perpetrators.
- A financially and administratively independent Commission performing its tasks without being subject to pressures or influences from any party.
- A competent court examining cases of corruption.
- Public prosecutors delegated to work within PACC.
- The role of the State Audit and Administrative Control Bureau (SAACB) in reporting any suspicion of corruption should be highlighted.
- Monitoring systems and complaints departments in many public institutions and local councils.
- Increased number of civil society organizations taking part in anti-corruption efforts, particularly in raising awareness of the hazards and consequences of corruption.

II. Weaknesses

- PLC disruption, hindering its monitoring role.
- Unfinished review and endorsement of certain legislations that would enhance anti-corruption efforts.
- Delayed approval of a Palestinian law that guarantees the right to access information.
- Palestinian judiciary's leniency in issuing rulings against some of the accused of corruption crimes in the stages of appeal and cessation.
- Weak interest of certain stakeholders in implementing the agreed plans.
- Weakness in the media and information environment that would support national anti-corruption efforts.

Analysis of the external environment

I. Opportunities

- Vigorous public rejection of corruption within the Palestinian society.
- Increasing public confidence in the capacity and effectiveness of anti-corruption efforts.
- Increased awareness in the Palestinian society about anti-corruption principles and mechanisms.
- Strong international and Arab concern with combating corruption.
- Palestine's membership in the Arab Convention against Corruption and its recent accession to the UNCAC.
- Outstanding relations with Arab and international anti-corruption agencies.
- Support of Palestinian anti-corruption efforts by a number of international agencies.

II. Challenges

- The ongoing Israeli occupation of the Palestinian territory, particularly Jerusalem, and the large number of Israeli internal and external barriers hindering anti-corruption efforts.
- Slow pace in ending the political split despite the formation of a national consensus government, and weak anti-corruption efforts in Gaza.

- Weak international coordination in the extradition of criminals and recovery of the proceeds of crimes.
- A general perception among Palestinian citizens that corruption is prevalent and that there is little serious interest in combating it and holding perpetrators accountable.
- Low community awareness of the concept and hazards of corruption in addition leading to therefore, to an unwillingness to report such corruption.
- Failure of the anti-corruption law to include such sectors as the private sector and cooperative societies, leaving them out of strategy implementation efforts.

Official bodies partnering in combating corruption

The implementation of the national anti-corruption strategy requires coordinated and concerted efforts from all parties concerned with the anti-corruption law. PACC is legally authorized to develop the national strategy, whereas the implementation of strategic components and programs should be a joint responsibility between PACC and other components of the national integrity system who partner with PACC in the anti-corruption efforts. The implementation requires a high degree of coordination between all stakeholders in performing their tasks and roles.

Therefore, it is important to ensure harmony between the pillars of the national integrity system in the efforts to combat corruption, and to delineate clear boundaries between the roles of different stakeholders. The plan of action accompanying this strategy spells out the roles of each party in the system, while also considering the roles of different stakeholders not mentioned specifically in the plan of action.

This strategy lists the following major stakeholders in its implementation as follows:

- Judiciary
- Palestinian Legislative Council (PLC)
- Executive authority (the Office of the President, the government)
- Palestinian Anti-Corruption Commission (PACC)
- Public prosecution Department
- State Audit and Administrative Control Bureau (SAACB)
- Civil society organizations
- The media
- Educational institutions
- The private sector and cooperative societies

Strategic focus areas

Focus area 1: Prevention of corruption

Focus area 2: Law enforcement and prosecution

**Focus area 3: Awareness raising, education, training
and community participation**

Focus area 4: International cooperation



Focus area 1: Prevention of corruption:

Context:

Preventive procedures and measures are a main element in the national anti-corruption strategy, as they address part of administrative and institutional disorders which create a conducive environment for opportunities of corruption to increase and expand both vertically and horizontally.

Protecting society from corruption and creating a conducive and enabling environment to achieve sustainable social and economic development is a main focus area in the national anti-corruption strategy. This requires the development of a set of sectoral and institutional preventive procedures and measures that would eliminate corruption in all its forms and address all kinds of disorders in the administrative and financial systems of institutions. This focus area serves as the cornerstone in building a sound and modern governance system, facilitating the implementation of the overall national vision of ending the occupation and building an independent corruption-free Palestinian state.

The ongoing absence of the PLC is undermining efforts to develop preventive measures related to the legislative and oversight functions of the PLC. Hence legislative reviews that would enhance prevention remain limited. Nevertheless, formal and informal efforts have recently managed to reach a consensus on a draft law on the right to access information, which is awaiting the council of minister's endorsement, and which would play an important role in strengthening preventive measures.

Efforts are ongoing on part of the government and semi-governmental and non-governmental organizations to develop procedures regulating the functioning of institutions and individuals concerned with the anti-corruption law. The government has issued the NDP 2014-2016, outlining the anticipated national action to enhance integrity and transparency and develop legislations, systems and procedures that would reinforce accountability and prevent corruption. The General Personnel Council (GPC) continued to issue the different administrative structures and criteria for recruitment, promotion, scholarship and punishment as a major shift towards developing more transparent criteria for recruitment in state agencies. Lead by the GPC, the national committee has issued a code of conduct for public employees. However, efforts to implement it are still needed. Furthermore, the judiciary, security forces and civil society organizations have issued codes of conduct for their staff, through those are yet to be

implemented. The Ministry of Local Government (MOLG) has also issued a code of conduct for employees in local councils, which is yet to be implemented.

Great efforts have been exerted to upgrade the PNA public procurement system. However, despite the promulgation of the public procurement decree-law No. 8 of 2014, which was published in the official gazette on 28 May 2014, and despite the endorsement of the procurement system specified in article 75 of the above-mentioned decree-law, the employed procedures are still based on the law No. 6 of 1999 on tendering for government works and the law No. 9 of 1998 on public supplies.

The SAACB and the central coordination unit in the Ministry of Finance (MOF) have made great efforts to enhance internal oversight within state institutions. The SAACB has finalized a report reviewing the internal oversight system in 78 official, semiofficial and civil society organizations, making recommendations to enhance this system, particularly in areas scoring low in the evaluation. In addition, MOLG has activated monitoring and oversight procedures at the level of local councils and developed internal systems aimed at enhancing internal and external oversight of the functioning of local councils. Nevertheless, more efforts are still needed to strengthen preventive measures, particularly in civil society organizations, Palestinian diplomatic bodies and some official sectors with a higher risk of corruption.

Purpose: A deterring legislative and institutional environment that reduces opportunities of corruption.

Goals:

- 1. Strengthen and enhance measures required to prevent corruption crimes and update the instruments and means for combating them, by:**
 - a. Conducting the required reviews of the implementation of NDP provisions related to strengthening transparency and accountability in State agencies.
 - b. Supporting agencies subject to the anti-corruption law, to develop their own corruption prevention programs, taking into consideration corruption risks within each agency.
 - c. Develop prevention measures at agencies that are subject to anti-corruption law to take into consideration risks of corruption.
 - d. Enhancing internal audit within agencies subject to the anti-corruption law.
 - e. Reviewing procedures used in applying the recruitment, promotion, scholarship and punishment criteria for public employees, particularly those related to senior positions.

- 2. Enhance the legislative environment that regulates the functioning of governmental work and that of the agencies that are subject to the provisions of the anti-corruption law to reduce the possibilities of corruption:**
 - a. Examining, reviewing and evaluating relevant legislations that regulate the functioning of official institutions and all persons subject to the anti-corruption law.

- b. Enacting the law on the right to access information and finalizing a legislative framework that supports transparency.
- c. Implement the general Codes of Conduct, training public employees on using and committing to use the codes of conduct on a day to day basis.
- d. Finalizing the preparation and endorsement of codes of conduct for the staff of civilian and military governmental institutions, local councils, charitable societies, NGOs, and all other entities that are subject to the anti-corruption law to guarantee transparency, integrity, impartiality, accountability and preservation of public funds.

3. Activate and enhance SAACB role, by:

- a. Reviewing legislations that regulate SAACB functioning and finalizing regulations and by-laws for the SAACB Law.
- b. Review the study on the assessment of SAACB role, to take measures needed to enhance SAACB role and reduce the opportunities for corruption.
- c. Increasing coordination and integration between PACC and SAACB.

Focus area 2: Law enforcement and prosecution

Context:

The law enforcement and prosecution focus area is a major component of the national anti-corruption strategy. Despite the importance of preventive measures outlined in the first component of this strategy, full public confidence in anti-corruption efforts is only possible when perpetrators of corruption are prosecuted, held accountable and punished, and public funds recovered. Punishment is a deterrent factor that delivers a clear message that the crime of corruption will eventually be prosecuted and that its perpetrators will receive adequate penalty.

Reports issued during the previous strategic period have accentuated the importance of issuing new legislations and amending the applicable ones in order to reinforce the anti-corruption law and expedite the trialing procedures of cases of corruption, while also ensuring a fair trial. This is envisaged to enhance public confidence in efforts to combat corruption and prosecute the offenders.

Despite delayed decision in cases involving corruption crimes in the stages of appeal and cessation, data from PACC reveal a marked increase in the number of complaints and reports lodged to the Commission since its establishment in 2010 and an increase in the number of cases forwarded to the CCC. Since its establishment till the end of 2014, PACC has received 1,348 complaint and notification, most of which were processed, only 320 complaint and notification were to be followed-up until the end of 2014. 93 cases were forwarded to the CCC, the court has convicted 39 of these cases. The total number of cases at the CCC were 52 by the end of 2014.

During the previous strategic period, law enforcement institutions have been strengthened by upgrading and increasing the number of employees in PACC, with particular regard to those with law enforcement power. During the same period, CCC judges have increased in number and received capacity building training. CCC working days were also increased from two to five

days a week. A training program was provided to PACC and CCC staff in cooperation with a Palestinian university.

In early 2012, PACC finalized the preparations to distribute financial disclosure forms to subjects of the anti-corruption law as an important step to enforce the principle of disclosing sources of wealth. By end of 2014, 19,946 financial disclosure forms were distributed to those required to submit such statements and the work is underway to renew the requirement for those who have submitted their statements previously and to complete the distribution of forms to the rest of those required by law to do so. In doing this, PACC focuses on groups that are more susceptible to corruption. However, PACC has noticed delays in the filling of such statements by some sectors, particularly the local government sector and civil society organizations for reasons related to the position of these bodies towards submitting such disclosure statements.

Purpose: Effective legislations, prosecution and judicial procedures to prosecute the corrupt and hold them accountable.

Goals:

- 1. Review and develop legislations that guarantee the prosecution and punishment of corruption crimes perpetrators, while guaranteeing their right to defense, by:**
 - a. Studying and reviewing the two penal codes applicable in the northern (West Bank) and southern (Gaza Strip) governorates and the draft penal code to ensure harmony with the UNCAC.
 - b. Studying and reviewing the criminal procedures law to guarantee streamlining of procedures in the investigation, trial, seizure orders, and timely confiscation of money and proceeds of corruption.
 - c. Developing and ratifying a legislation for the protection of whistleblowers and witnesses.

- 2. Expedite procedures for the management of complaints and reports made to PACC and trial procedures in the stages of appeal and cessation, by:**
 - a. Developing the criminal detection lab at PACC prosecution and training staff to use it.
 - b. Developing the CCC court notification system.
 - c. Continuing to investigate reasons for adjournment of corruption cases and making the required legal amendments to reduce the repeated adjournment of these cases.

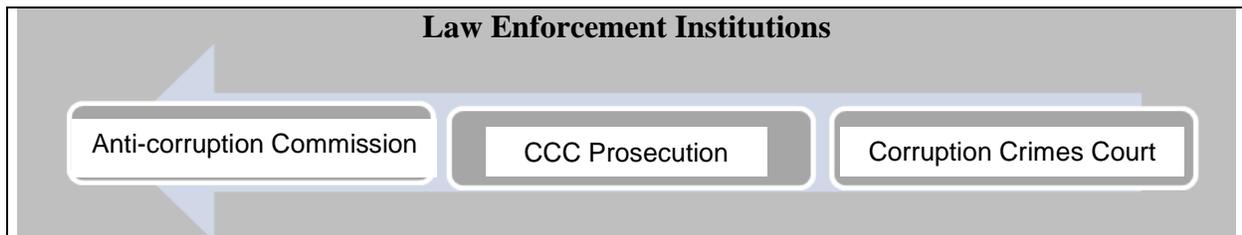
- 3. Realize the principle of disclosing sources of wealth, by:**
 - a. Enhancing the competency of investigations to realize the principle of disclosing sources of wealth for all bodies and individuals subject to the law.

- b. Amending the anti-corruption law to redefine those required to submit financial disclosure statements according to their level of susceptibility to corruption, in harmony with UNCAC.
- c. Continuing to identify those required to submit financial disclosures statements in all sectors subject to the anti-corruption law.
- d. Continuing to distribute financial disclosure forms to those required to submit such statements and applying the law against defaulters.
- e. Training those required to submit financial disclosure statements on how to administer the form and which documents to attach.
- f. Coordinating with the High Judicial Council to standardize financial disclosure and exchange reports related to those required to make such disclosure.

Corruption crimes stated in the amended anti-corruption law No 1 of 2005

1. *Crimes prejudicial to the duties of the public office and to public trust as provided for in the applicable penal code.*
2. *Crimes emanating from money laundering as provided for in the money laundering law.*
3. *Any act prejudicial to public funds.*
4. *Abuse of authority contrary to the provisions of the law.*
5. *Acceptance of nepotism and favoritism which eliminates right and achieves falsehood.*
6. *Illegal gains.*
7. *All acts provided for in the Arab and International conventions against corruption ratified by the PNA or to which it is party.*

4. Enhance the capacity of law enforcement institutions in combating corruption, by:



- a. Enhancing PACC effectiveness in performing its duties regarding investigation and collection of information in corruption cases.
- b. Expanding the use of advanced investigation techniques in corruption cases.
- c. Building the capacity of PACC staff.
- d. Developing specialized programs and holding advanced training courses for PACC prosecution members to keep them abreast with related advancements in this field.
- e. Enhancing the effectiveness of CCC staff.
- f. Developing specialized programs and holding advanced training courses for CCC judges to keep them abreast with related advancements in this field.
- g. Enhancing coordination between law enforcement agencies, particularly the judicial police, security forces, public prosecution and the judiciary.
- h. Developing legislations, procedures, manuals and codes of conducts to regulate the functioning of the three law enforcement agencies.

Focus area 3: Awareness raising, education, training and community participation

Context:

Building a society that rejects all forms of corruption and actively engages in anti-corruption efforts, that recognizes the dangers of corruption for citizens' wellbeing rights and rule of law, is a main component of any effective anti-corruption strategy. This component targets individuals in all positions and all segments of society to raise their awareness about corruption, its forms and hazards, to strengthen society's rejection of corruption and enhance public engagement in fighting it.

This focus area seeks to expand the popular and institutional base that supports and promotes anti-corruption efforts by enhancing community awareness of corruption issues, how to reject and fight corruption and how to protect society from its hazards. To achieve this, various communication means should be employed, such as educational materials, the media and awareness-raising sessions.

During the previous strategic period, PACC has combined its efforts with those of other stakeholders in strategy implementation in order to create a community environment that supports integrity, transparency and accountability and rejects any culture of tolerance towards corruption, through hundreds of awareness-raising activities targeting various social segments. PACC has also strived to promote a spirit of community participation and build an anti-corruption culture within institutions.

As part of the implementation of the previous strategy, 24 official and community stakeholders have assumed the organization of hundreds of activities and events, raising awareness of over 14,300 direct participants, in addition to hundreds of thousands of others who have had the chance to watch, read or listen to educational materials being disseminated through various media channels.

In order to achieve the strategic objectives (goals) under this focus area, strategy stakeholders have held hundreds of workshops and dozens of training courses, conferences, open discussion sessions and student contests and published awareness raising booklets, brochures and media programs, some targeting specific sectors and others the general public. Attention has been paid to developing plans and recommendations related to specific sectors, such as civil society, women and youth, local governance and external grants. Efforts were made to reach the largest possible number of students and parents in cooperation with the Ministry of Education and Higher Education. Nevertheless, a lot is still needed in this respect.

In spite of the focus on conducting various activities to raise community awareness and participation, negative perceptions of anti-corruption efforts are still prevalent. This could be attributed to the misunderstanding of the notion of corruption as explained in the anti-corruption

law. As long as there is lack of knowledge about what corruption crimes are stated in the law, poor and lenient application of Palestinian laws at all levels, and as long as the Israeli occupation maintains its grip over the Palestinian territory and economic and social indicators keep declining, citizens' perception of anti-corruption efforts will remain pessimistic in spite of all accomplishments made in fighting corruption since the establishment of PACC in 2010.

Relevant strategy stakeholders have tried to assess opinions, needs and suggestions of the different sectors, such as the civil society sector in general and particularly the women's sector, the youth sector, local government, the diplomatic sector, the security sector, and the management and implementation of external grants. These assessments have made specific recommendations suggesting to continue to enhance community involvement in anti-corruption efforts as a means to strengthen prevention of corruption and increase effective reporting cases of corruption to PACC.

Meetings with academics and students have stressed the need to enhance the role of general and university education in anti-corruption efforts by developing research and instructional programs and extracurricular activities. Despite efforts made to expand the involvement of school and university students, the relevant school and university curricula have not been reviewed during the previous strategic period. It is hoped that stakeholders involved in the implementation of the present strategy will review all educational courses and add new courses to help raise the new generations on the principles of integrity, transparency and accountability and on rejecting and combating all forms of corruption.

Purpose: A social environment that supports and participates in anti-corruption efforts, promotes the values of integrity, transparency and accountability and rejects any corruption-tolerant culture.

Goals:

- 1. Educating the new generation on the principles of integrity, transparency, accountability, and anti-corruption, by:**
 - a. Developing and adopting a plan to introduce courses and contents on integrity, transparency and anti-corruption at Palestinian schools, colleges and universities.
 - b. Organizing various extracurricular activities, such as student contests, research and training courses and workshops, to raise awareness of students and staff in schools and universities on the dangers of corruption and their responsibility in fighting corruption.
 - c. Organizing various training courses and workshops to make use of the expertise and competencies of religious scholars on the dangers of corruption and how to combat it.
 - d. Conducting awareness raising and training activities targeting youth and women to enhance their participation in anti-corruption efforts and promote the values of integrity, transparency and accountability.

- 2. Promote the principles of integrity, transparency and anti-corruption among public (government) employees, by:**

- a. Conducting training needs assessments for public employees on combating and preventing corruption and assuring these are set under the stakeholders' sectoral plans.
- b. Developing training curricula and materials and training of trainers at the National Training Institute (affiliated to GPC) on integrity, anti-corruption and public office ethics.
- c. Training public sector employees and stakeholder employees on the principles of integrity, transparency, anti-corruption and community accountability.

3. Enhance community participation in anti-corruption efforts, by:

- a. Continuing to exert efforts to promote effective involvement of civil society organizations in anti-corruption efforts, specifically in the field of education, awareness-raising and capacity building.
- b. Enhancing the participation of the private sector, local councils, educational institutions, sports and youth institutions and religious scholars in anti-corruption efforts.
- c. Supporting and directing scientific research activities towards enhancing integrity and anti-corruption and encouraging and supporting academics and students to conduct research and studies in this field.
- d. Creating a national clearinghouse and database to provide information to those seeking it.

4. Enhance the role of media in anti-corruption efforts in a professional and impartial manner, by:

- a. Publishing and disseminating a media strategy for combating corruption that enhances the role of media in anti-corruption efforts in a professional and impartial manner.
- b. Activating the role of investigative journalism in detecting and exposing corruption.
- c. Improving the current media environment by reviewing the relevant laws and regulations and promoting the role of media professionals in anti-corruption efforts.
- d. Training media personnel on the notion of corruption and how to deal with corruption cases in a way which is consistent with the law and which does not prejudice the principle of "innocent until proven guilty."
- e. Conducting continuous media campaigns to raise public awareness of and community participation in anti-corruption efforts.

Focus area 4: International cooperation

Context:

Corruption crimes are increasingly of a transnational character. Their perpetrators, particularly those holding senior positions and enjoying wide international relations, strive to smuggle the proceeds of their crimes abroad. They may also flee abroad themselves. Thus, reinforcing international cooperation in the field of fighting corruption is of utmost importance, particularly for extraditing criminals, transferring convicted individuals, exchanging legal assistance,

cooperating in the field of law enforcement, joint investigations and information exchange, combating money laundering and recovering the proceeds of crimes.

Palestine's accession to the UNCAC in May 2014 and the self-assessment that the State of Palestine has assumed as part of its compliance with the Convention reflect a major stride towards activating international cooperation. Furthermore, the enhanced relations with Arab and friendly countries, especially the neighboring ones, is important for Palestine in terms of cooperation in law enforcement, particularly extradition of criminals and return of the proceeds of crimes (stolen assets), despite the fact that extradition of criminals and recovery of proceeds are a complicated issue all over the world and characterized by many weaknesses in terms of implementation.

Despite the low level of international readiness to cooperate with Palestine and although Palestine is not a member in the Interpol, the State of Palestine has managed to recover over USD 70 million of proceeds of crimes during the previous strategic period and to return a fugitive and is still working hard to recover more individuals and funds.

Palestine has continued its attempts to engage in international forums related to promoting integrity, transparency and anti-corruption and has enhanced its role in international and Arab transparency organizations, taking part in a large number of Arab and international conferences, workshops, courses, study visits, consultations and meetings. This has contributed to building the capacity of strategy stakeholders, especially law enforcement institutions.

<p>Purpose: Develop bilateral and multilateral international cooperation, and relations with international organizations to enhance anti-corruption efforts.</p>

Goals:

1. Enhance coordination and cooperation between the State of Palestine and the relevant regional organizations and bodies, by:

- a. Contributing to the activation of Riyadh Convention between Palestine and other member states.
- b. Concluding bilateral and multilateral cooperation agreements between Palestine and countries in the region, especially neighboring countries, in the field of extradition of criminals, mutual legal assistance, and cooperation in the field of law enforcement, joint investigations, information exchange, and asset recovery.
- c. Activate the relation between Palestine and regional organizations concerned with promoting integrity, transparency, accountability and anti-corruption at the regional level.

2. Enhance coordination and cooperation between the State of Palestine and the relevant international organizations and bodies, by:

- a. Activating Palestine's participation in international efforts to implement the UNCAC.
- b. Provide an appropriate atmosphere for Palestine to join the international criminal police organization "Interpol".
- c. Proceeding with the self-assessment procedures in compliance with the UNCAC.

- d. Concluding bilateral and multilateral cooperation agreements in the field of extradition of criminals, mutual legal assistance, and cooperation in the field of law enforcement, joint investigations, information exchange, and asset recovery.
- e. Activate the relation between Palestine and international organizations concerned with promoting integrity, transparency, accountability and anti-corruption at the international level.

Monitoring and evaluation strategy:

The strategy stakeholders believe it is important to take the following major steps in order to realize and implement this strategy:

- I. Following the completion of strategy development and the engagement of all stakeholders in its review, the strategy along with the intervention plan will be shared with all strategy stakeholders for them to take the required action for implementing their interventions.
- II. Each strategy stakeholder will incorporate the relevant interventions in their own plans and will refer those to PACC, which will monitor implementation with the concerned stakeholders.
- III. PACC President will create a national steering committee to monitor and evaluate the implementation of the strategy. Each stakeholder will establish its own technical committee to follow-up on the implementation of the intervention plan. A detailed implementation plan should be designed, drafted and signed by both participating stakeholder and PACC.
- IV. PACC will hold periodical meetings with the technical committees to follow up on the implementation of activities.
- V. The needed HR and financial resources should be used/hired by implementing stakeholders to assure activities implementations.
- VI. A Palestinian body will be contracted to conduct a midterm review of the strategy and a final evaluation at the end of the strategic period.

Appendix: Implementation Plan

Focus area 1: Prevention of corruption

1-1 Strategic goal: Strengthen and enhance measures required to prevent corruption crimes and update the instruments and means for combating them

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
1-1-1	Conducting the required reviews of the implementation of NDP provisions related to strengthening transparency and accountability in State agencies.	Ministry of Planning and Administrative Development	PACC, SAACB, Relevant commissions and ministries	2015-2016	A national committee that follows up on national processes set with regards to transparency and accountability
1-1-2	Supporting legal review for agencies concerned with the anti-corruption law to guarantee transparency, equal opportunity and decrease in corruption cases.	SAACB, PACC	Relevant commissions and ministries	2015	7 review reports of government regulations and laws.
1-1-3	Develop Anti-corruption programs for institutes under rule of the anti-corruption law	PACC	General Personnel Council, 7 Ministries and certain departments	2016-2018	A number of programs have been developed and approved
1-1-4	Enhancing internal audit within agencies concerned with the anti-corruption law.	SAACB	Ministry of Finance and targeted bodies	2015-2018	Developed monitoring systems at 50 of the institutions subject to the anti-corruption law
1-1-5	Reviewing procedures used in applying the recruitment, promotion, scholarship and punishment criteria for public employees, particularly those related to senior positions to assure justice and fairness.	General Personnel Council	PACC, SAACB	2015	Apply transparent procedures for appointments, promotions, scholarships and penalties.

1-2 Strategic goal: Enhance the legislative environment that regulates the work of the government and all agencies that are subject to the provisions of the anti-corruption law to reduce the possibility of corruption

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
1-2-1	Studying, reviewing and evaluating relevant legislations that regulate the functioning of official institutions and all persons subject to the anti-corruption law.	PACC	The relevant ministries, the Palestinian Cabinet, the Palestinian Legislative, the presidential office, civil society institutions	2015-2018	A number of legislations have been discussed, amended and updated assuring there are no conflicts between texts, assuring gaps are bridged and adopted.
1-2-2	Enacting the law on the right to access information and finalizing a legislative framework that supports transparency.	Council of Ministers	The Palestinian Legislative Council, the presidential office, agencies subject to anti-corruption law, related national committee.	2015	Officially ratified law published in the national Gazette
1-2-3	Implement the general Codes of Conduct, training public employees on using and committing to use the codes of conduct on a day to day basis.	General Personnel Council	PACC, the national committee, all training committees and relevant institutions.	2015-2016	30 thousands employees have been trained on using the code of conduct
1-2-4	Finalizing the preparation and endorsement of codes of conduct for the staff of civil and military governmental institutions, local councils, charitable societies, NGOs, and all other entities subject to the anti-corruption law to guarantee transparency, integrity, impartiality, accountability and preservation of public funds.	PACC	The Ministry of Interior, The General Personnel Council ,SAACB, Ministry of Local Government, Civil Society Institution	2016-2018	4 codes of conduct designed and applied at the civil and military official institutions, at local councils and civil society institutions.

			Coordination Board, Municipalities Union		
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1-3 Strategic goal: Activate and enhance SAACB's role

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
1-3-1	Reviewing legislations that regulates SAACB's functioning and finalizing regulations and by-laws for SAACB	SAACB	PACC, Ministry of Justice, the Palestinian Cabinet, The Palestinian Legislative Council, the Presidential office.	2016-2018	A number of legislation and regulations for SAACB has been issued.
1-3-2	Conducting an assessment of SAACB's role to identify strengths and weaknesses and to take the measures needed to enhance SAACB role and reduce the opportunities for corruption.	SAACB	PACC	2015	It is recommended to review and set actions to strengthen the bureaus' role
1-3-3	Increasing coordination and integration between PACC and SAACB	SAACB	PACC	2015-2018	Review reports submitted to the commissions to provide recommendations through a joint, effective committee.

Focus area 2: Law enforcement and prosecution

2-1 Strategic goal: Review and develop legislations that guarantee the prosecution and punishment of corruption crimes perpetrators, while guaranteeing their right to defense

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
2-1-1	Examining and reviewing the two penal codes applicable in the northern (West Bank) and southern (Gaza Strip) governorates and the draft penal code to ensure harmony with the UNCAC.	Ministry of Justice	PACC, High Judicial Council, the Public Prosecution, the Palestinian Cabinet, The Palestinian Legislative Council, Office of the President, Civil Society Organizations	2017	Draft a penal code in harmony with the UNCAC.
2-1-2	Examining and reviewing the criminal procedures law to guarantee streamlining of procedures in the investigation, trial, seizure orders, and timely confiscation of money and proceeds of corruption as per the basic law.	Ministry of Justice	PACC, High Judicial Council, the Public Prosecution, the Palestinian Cabinet, The Palestinian Legislative Council, Office of the President	2016	A criminal procedures law streamlined with the UNCAC
2-1-3	Developing and ratifying a legislation for the protection of whistleblowers and witnesses.	PACC	Palestinian Cabinet, Office of the President, Palestinian Legislative Council	2016	A special legislation for the protection of whistleblowers and witnesses

2-2 Strategic goal: Expedite procedures for the management of complaints and reports made to PACC and trial procedures in the stages of appeal and cessation

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
2-2-1	Developing the criminal detection lab at PACC prosecution and training staff to use it.	PACC	PACC prosecution	2015	An effective criminal detection lab at PACC prosecution
2-2-2	Developing the CCC court notification system.	High Judicial Council	Judicial police	2015	Developed legal notification system to include lawyers, plaintiffs and witnesses
2-2-3	Continuing to investigate reasons for adjournment of corruption cases and making the required legal amendments to reduce the repeated adjournment of these cases.	High Judicial Council		2015	Laws to limit anti-corruption case adjournment

2-3 Strategic goal: Realize the principle of disclosing sources of wealth

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
2-3-1	Enhancing the competency of investigations to realize the principle of disclosing sources of wealth for all bodies and individuals subject to the law.	PACC		2015-2018	investigations to realize the principle of disclosing sources of wealth
2-3-2	Amending the anti-corruption law to redefine those required to submit financial	PACC	Implementing stakeholders and	2015	Amended anti-corruption law

	disclosure statements according to their level of susceptibility to corruption, in harmony with UNCAC.		bodies subject to the Anti-corruption law		
2-3-3	Continuing to identify those required to submit financial disclosures statements in all sectors subject to the anti-corruption law.	PACC	bodies subject to the Anti-corruption law	2015	List of those required to submit financial disclosures
2-3-4	Continuing to distribute financial disclosure forms to those required to submit such statements and applying the law against defaulters	PACC		2015-2018	50000 individuals have been identified and received financial disclosure forms
2-3-5	Training those required to submit financial disclosure statements on how to administer the form and which documents to attach.	PACC	Implementing stakeholders	2015-2018	A number of individuals required to submit financial disclosure have been trained to use the form
2-3-6	Coordinating with the High Judicial Council to standardize financial disclosure and exchange reports related to those required to make such disclosure.	PACC	High Judicial Council	2016	A standardized financial disclosure form and unified statistics

2-4 Strategic goal: Enhance the capacity of law enforcement institutions in combating corruption

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
2-4-1	Enhancing PACC effectiveness in performing its duties regarding investigation and collection of information in corruption cases.	PACC		2015-2018	Effective administration of data collection and management.
2-4-2	Expanding the use of advanced investigation techniques in corruption cases.	PACC	The Public Prosecution	2015-2018	25 PACC members have been trained to use advanced

					investigation techniques in corruption cases
2-4-3	Building the capacity of PACC staff, particularly those with law enforcement power.	PACC	The Ministry of Planning, Palestinian Universities	2015-2018	50 of PACC staff members have been trained.
2-4-4	Developing specialized programs and holding advanced training courses for PACC prosecution members to keep them abreast with related advancements in this field.	Legal Training Institute	The Public Prosecution, The Ministry of Planning, Palestinian Universities, PACC	2015-2018	7 prosecution remembers have participated in specialized anti-corruption programs.
2-4-5	Enhancing the effectiveness of CCC staff.	High Judicial Council	The Ministry of Planning, Legal Training Institute Palestinian Universities	2015-2018	Staff at CCC has been increased from to..... and capacities have been developed.
2-4-6	Developing specialized programs and holding advanced training courses for CCC judges to keep them abreast with related advancements in this field.	Legal Training Institute	High Judicial Council	2015-2018	15 judges have participated in specialized anti-corruption programs.
2-4-7	Enhancing coordination between law enforcement agencies, particularly the judicial police, security forces, public prosecution and the judiciary.	PACC	High Judicial Council, The Public Prosecution ,The Ministry of Interior	2015-2018	A few cases have been forwarded and followed-up on.
2-4-8	Developing legislations, procedures, manuals and codes of conduct to regulate the functioning of the three law enforcement agencies.	PACC and rule of law institutes	The Palestinian Legislative Council	2015-2018	Effective, developed legislations, procedures, manuals and codes of conduct

Focus area 3: Awareness raising, education, training and community participation

1-3 Strategic goal: Educate the new generation on the principles of integrity, transparency, accountability, and anti-corruption

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
3-1-1	Developing and adopting a plan to introduce courses and contents on integrity, transparency and anti-corruption at Palestinian schools, colleges and universities.	The Ministry of Education and Higher Education, Palestinian Universities	PACC, institutes and colleges, Palestinian Universities	2017-2018	Advanced courses at schools and three universities
3-1-2	Organizing various extracurricular activities, such as student contests, research and training courses and workshops, to raise awareness of students and staff in schools and universities on the dangers of corruption and their responsibility in fighting corruption.	The Ministry of Education and Higher Education Palestinian Universities	PACC, institutes and colleges, Civil Society Organizations	2015-2018	5000 school students have been informed of the main basics of combating corruption.
3-1-3	Organizing various training courses and workshops to make use of the expertise and competencies of religious scholars on the dangers of corruption and how to combat it.	the Ministry of Endowments and Religious Affairs	PACC	2016-2017	Religious scholars have been trained on the dangers of corruption, and essentially these scholars conducted ten sermons in churches and mosques.
3-1-4	Conducting awareness raising and training activities targeting youth and women to enhance their participation in anti-corruption efforts and promote the values of integrity, transparency and accountability.	Ministry of Women Affairs, The Olympic Committee, The Higher Council for Youth and Sports, Civil Society Organizations	PACC	2015-2018	A few youth and women have been trained and their capacities developed with regards to anti-corruption.

3-2 Strategic goal: Promote the principles of integrity, transparency and anti-corruption among public (government) employees

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
3-2-1	Conducting training needs assessments for public employees on combating and preventing corruption, assuring these are set under the stakeholders' sectoral plans.	PACC	Implementing stakeholders	2016	A number of studies that have been conducted, edited and published.
3-2-2	Developing training curricula and materials and training of trainers at the National Training Institute (affiliated to GPC) on integrity, anti-corruption and public office ethics.	General Personnel Council	PACC	2017-2018	500 trainees received training on a systematic base covering the basics of combating corruption.
3-2-3	Training public sector employees and stakeholder employees on the principles of integrity, transparency, anti-corruption and community accountability.	PACC	Implementing stakeholders	2015-2018	A number of employees subject to the anti-corruption law and some of the implementing stakeholders have been trained on the principles of integrity, transparency, combating corruption, accountability and community participation.

3-3 Strategic goal: Enhance community participation in anti-corruption efforts

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
3-3-1	Continuing to exert efforts to promote	PACC	Civil Society Institutions	2015-2018	20 Civil society organizations

	effective involvement of civil society organizations in anti-corruption efforts, specifically in the field of education, awareness-raising and capacity building.				have been involved in community participation efforts to raise awareness to transparency and integrity.
3-3-2	Enhancing the participation of the private sector, local councils, educational institutions, sports and youth institutions and religious scholars in anti-corruption efforts.	PACC	the Ministry of Endowments and Religious Affairs, The Ministry of Education and Higher Education, The Ministry of Local Government, The Olympic Committee, The Higher Council for Youth and Sports, commissions and associations from both the private and the public sectors	2015-2018	20 workshops were conducted with targeted groups, 8 awareness raising material have been published.
3-3-3	Supporting and directing scientific research activities towards enhancing integrity and anti-corruption and encouraging and supporting academics and students to conduct research and studies in this field.	PACC	The Ministry of Education and Higher Education, universities and relevant institutions.	2015-2018	200 study and reports have been conducted and discussed on the level of universities and schools.
3-3-4	Creating a national clearinghouse and database to provide information to those seeking it.	PACC	Implementation stakeholders	2015	An effective, working national clearinghouse and database

3-4 Strategic goal: Enhance the role of media in anti-corruption efforts in a professional and impartial manner

Priority	Procedure	Implementing body	Participating	Implementation	Performance indicators
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			bodies	timeline	
3-4-1	Publishing and disseminating a media strategy for combating corruption that enhances the role of media in anti-corruption efforts in a professional and impartial manner.	PACC	The Ministry of Information, Palestinian Journalists' Syndicate, Civil Society Institutions with anti-corruption specialists.	2016-2017	Active and effective media strategy
3-4-2	Activating the role of investigative journalism in detecting and exposing corruption.	Palestinian Journalists' Syndicate	PACC 'Ministry of Information ' Civil Society Institutions with anti-corruption specialists.	2015-2018	10 investigative articles have been published
3-4-3	Improving the current media environment by reviewing the relevant laws and regulations and promoting the role of media professionals in anti-corruption efforts.	Palestinian Journalists' Syndicate	PACC, Ministry of Information, Civil Society Institutions.	2016	Laws and regulations have been reviewed and a number of media personnel have become more aware of anti-corruption efforts
3-4-4	Training media personnel on the notion of corruption and how to deal with corruption cases in a way which is consistent with the law and which does not prejudice the principle of "innocent until proven guilty."	Palestinian Journalists' Syndicate	PACC, High Judicial Council, The Public Prosecution, the educational sector, Civil Society Institutions.	2015-2018	200 media students and practitioners have been trained on the anti-corruption principles.
3-4-5	Conducting continuous media campaigns to raise public awareness of and community participation in anti-corruption efforts.	Palestine Public Broadcasting Corporation Wafa news and Info.	PACC, Wafa news and info Palestinian Government Media Center, Ministry of	2015-2018	3 media campaigns have been implemented

			Information, Government spokesperson, Palestinian Journalists’ Syndicate		
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Focus area 4: International cooperation

4-1 Strategic goal: Enhance coordination and cooperation between the State of Palestine and the relevant regional organizations and bodies

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
4-1-1	Contributing to the activation of Riyadh Convention between Palestine and other member states.	Ministry of Justice	The Ministry of Exterior, PACC	2015-2018	The agreement has been activated
4-1-2	Provide an appropriate atmosphere for Palestine to join the international criminal police organization “Interpol”.	The Ministry of Interior, the Ministry of Exterior and the Ministry of Justice	All other relevant stakeholders	2015-2018	Application to join Interpol has been submitted
4-1-3	Concluding bilateral and multilateral cooperation agreements between Palestine and countries in the region, especially neighboring countries, in the field of extradition of criminals, mutual legal	PACC	The Ministry of Exterior ‘Ministry of Justice ‘The Ministry of Interior	2015-2018	2 agreements have been signed and are being followed up.

	assistance, and cooperation in the field of law enforcement, joint investigations, information exchange, and asset recovery.				
4-1-4	Activate the relation between Palestine and regional organizations concerned with promoting integrity, transparency, accountability and anti-corruption at the regional level.	PACC	The Ministry of Exterior ·The Ministry of Planning · Civil Society Organizations	2015-2018	Active Palestinian participation in the Arab Transparency Regional program and UNDP

4-2 Strategic goal: Enhance coordination and cooperation between the State of Palestine and the relevant international organizations and bodies

Priority	Procedure	Implementing body	Participating bodies	Implementation timeline	Performance indicators
4-2-1	Activating Palestine's participation in international efforts to implement the UNCAC.	PACC		2015-2018	Active Palestinian participation with UNDP programs and other relevant organizations
4-2-2	Proceeding with the self-assessment procedures in compliance with the UNCAC.	PACC	Governmental experts team	2015-2018	Prepare to conduct self-assessment
4-2-3	Concluding bilateral and multilateral cooperation agreements in the field of extradition of criminals, mutual legal assistance, and cooperation in the field of law enforcement, joint investigations, information exchange, and asset recovery.	PACC	The Ministry of Exterior, Ministry of Justice, The Ministry of Interior	2015-2018	2 cooperation agreements have been signed and followed-up
4-2-4	Activate the relation between Palestine and international organizations concerned with promoting integrity, transparency,	PACC	The Ministry of Exterior, The Ministry of	2015-2018	Active Palestinian participation within the regional programs of Transparency International, UNDP

	accountability and anti-corruption at the international level.		Planning, Civil Society Organizations		and other international organizations.
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