



ANNEX C1: Twinning Fiche

Project title: Enhancing Democratic Governance in Palestine¹ through Strengthening Public Integrity and Corruption Prevention

Beneficiary administration: The Palestinian Anti-Corruption Commission (PACC)

Twining Reference: PS 20 ENI JH 01 22

Publication notice reference: EuropeAid/176226/DD/ACT/PS

EU funded project

TWINNING TOOL

¹ The designation of Palestine shall not be construed as recognition of a State of Palestine and is without prejudice to the individual positions of the Member States.

1. Basic Information

- 1.1 Programme: Direct Financial Support to Recurrent Expenditures of the Palestinian Authority 2020. ENI/2020/42-015 - Direct management.

For UK applicants: Please be aware that following the entry into force of the EU-UK Withdrawal Agreement² on 1 February 2020 and in particular Articles 127(6), 137 and 138, the references to natural or legal persons residing or established in a Member State of the European Union and to goods originating from an eligible country, as defined under Regulation (EU) No 236/2014³ and Annex IV of the ACP-EU Partnership Agreement⁴, are to be understood as including natural or legal persons residing or established in, and to goods originating from, the United Kingdom⁵. Those persons and goods are therefore eligible under this call.

- 1.2 Twinning Sector: Justice and Home Affairs (Integrity & Anti-Corruption)

- 1.3 EU funded budget: EUR 1.5 million

- 1.4 Sustainable Development Goals: Goal 16: Promote just, peaceful and inclusive societies

A national team for SDG 16 was formed, headed by the Ministry of Justice. The team formed three working groups; Strengthening Efforts to Combat Corruption and Transparency, Strengthening Access to Justice, and a third group for Strengthening Institutional Building and Public Administration. The Anti-Corruption Commission chairs the Anti-Corruption Efforts Strengthening Group, which has the following mandate:

1. Target 16.4: Significantly reduce illicit flows of funds and weapons, promote the recovery and return of stolen assets, and combat all forms of organized crime by 2030.
2. Target 16.5: Significantly reduce corruption and bribery in all its forms.
3. Target 16.6: Establish effective, transparent and accountable institutions at all levels.
4. Target 16.10: Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements.

2. Objectives

2.1 Overall Objective:

Supporting democratic governance in Palestine by strengthening the ability of the Palestinian Anti-Corruption Commission (PACC) to promote transparency and integrity values in the society while rooting the measures of the corruption prevention.

² Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community.

³ Regulation (EU) No 236/2014 of the European Parliament and of the Council of 11 March 2014 laying down common rules and procedures for the implementation of the Union's instruments for financing external action.

⁴ Annex IV to the ACP-EU Partnership Agreement, as revised by Decision 1/2014 of the ACP-EU Council of Ministers (OJ L196/40, 3.7.2014).

⁵ Including the Overseas Countries and Territories having special relations with the United Kingdom, as laid down in Part Four and Annex II of the TFEU.

2.2 Specific objectives:

1. Review and modernise the national anti-corruption laws and policies in selected sectors to guarantee the implementation, and activation of these laws and policies with related institutions.
2. Enhance the capacities of PACC in assessing and managing corruption risks in selected sectors and in analyzing their anti-corruption environment, to develop baseline and indicators for guiding reform.
3. Enhance the capabilities of PACC and stakeholders - public sector, private sector including the Media, and CSOs, in reaching out and enabling citizens to challenge corruption, contributing to the implementation of the National Anti-Corruption Strategy, and PACC's internal strategy to promote the values of transparency and integrity.

2.3 The elements targeted in strategic documents i.e. National Development Plan/Cooperation agreement/Association Agreement/Sector reform strategy and related Action Plans

The PACC has developed its own strategy (2021-2023) with the aim of focusing on building the institution, enhancing its governance, and developing its capabilities to become more capable and competent for leading the national efforts for promoting integrity and combating corruption. At the same time, PACC is ensuring the fulfilment of its obligations and responsibilities in the promotion of integrity and anti-corruption values, which is established in the National Cross-Sectoral Strategy for Integrity and Anti-Corruption (2021 – 2022), which was extended until 2023.

The PACC needs to address and tackle some issues, which may limit the effectiveness of its performance, including:

1. Review and modernise the Anti-Corruption Law
2. Develop a number of administrative, financial and technical procedures and manuals, according to best practices and international standards.
3. Sharing best experiences in the fields of strategic planning and quality control and capacity building.
4. The need for a tailored training and capacity building plan and capacity building for discovering and dealing with digital transactions relating to corruption, and enhancing institutional capabilities (especially enabling the financial and legal investigators).
5. Effective system for monitoring and evaluation based on the international standards at the level of the national plan.
6. Update a quality management system, anti-bribery, and an internal audit system based on international best practices.

7. Control the smuggling of money obtained from the crimes outside the territory of the state, especially the extradition of criminals and the recovery of criminal proceeds, which are considered to be thorny issues.
8. Have a Right to Information Law in place.
9. Develop policies supporting the application of the principles of transparency, integrity and accountability.
10. Support the strategic and annual planning and review the PACC strategy in accordance with international standards.
11. The need for an information resource center.
12. Improve the public perception of PACC to better match the reality, especially through more effective campaigns to promote reporting corruption, better production of TV and radio spots on corruption, as well as promoting the accomplishments of PACC to the public.
13. Promote a more inclusive approach in combating corruption.
14. Improve coordination mechanisms with relevant international key players.
15. Learn more from the international experiences on protecting whistleblowers.

3. Description

3.1 Background and justification:

The Legislative Council issued Law by Decree No. 7 amending the Illicit Gain Law, in 2005. In 2010, the first Palestinian Anti-Corruption law was endorsed, stipulating the establishment of an anti-corruption body – the PACC, and its commissioner was appointed in 2010. Also, the Law 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.

PACC has the mandate of both preventing corruption and law enforcement, in line with the requirements of articles 6 and 36 of the United Nations Convention against Corruption (UNCAC).

The Anti-Corruption Law of 2010, and its amendments contributed to the development of a general policy to combat corruption in cooperation with the stakeholders, and to setting the required plans and programs to execute it. PACC seeks to fulfil its duties efficiently and effectively to achieve the national vision that has been adopted by all public, private sector and the civil society institutions that participate in implementing it.

Combating and controlling corruption, demonstrated the need to set and implement efficient policies and procedures. These policies and procedures shall include raising social awareness on its risks, prosecuting and holding its perpetrators accountable. To this end,

main stakeholders representing the public sector, private sector and the civil society institutions, headed by PACC, have launched a National Cross-Sectoral Anti-Corruption Strategy for (2021-2023).

In order to carry out its functions, a new organizational structure for PACC was prepared and approved. According to the new organizational structure, the administrative bodies were divided into main administrations and units, support administrations and units with a total staff of 140 according to the following:

Main administrative bodies:

- The general administration of complaints, reports and inquiry
- The general administration of investigation
- The general administration of planning and policies
- The general administration of integrity and corruption prevention
- Witnesses, whistle- blowers and expert's protection unit
- Financial disclosure statements unit
- Legal affairs unit
- International and local cooperation unit
- Gender and human rights unit

Supportive administrative bodies:

- The Commissioner Bureau
- The general administration of administrative and financial affairs.
- Internal oversight unit
- The general administration of information technology.

3.2 Ongoing reforms:

The PACC has been implementing reforms related to its regulatory framework and policies. It has adopted a participatory approach and engaged various stakeholders (Public institutions, civil society organizations, private sector, and international organizations) when reviewing laws to be amended, or when analysing gaps and identifying needs to introduce regulations.

The Anti-Corruption Law was amended during 2018, and became in force on 3/3/2019. The Law became more focused on corruption suspicions stipulated in the amended law in 2010, and the principle of illicit gains, activating litigation at the levels of appeal and cassation, developing materials for the protection of witnesses, experts and whistleblowers, in addition to setting more controls for PACC's Commissioner

This is in addition to introducing the Gift regulation, Conflict of Interest regulation, Whistle-blowers, Witnesses and Experts' protection regulation, Code of conduct, internal personnel regulation. 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.

However, there is still a persistent need to approve a package of other supporting legislations developed to serve more effectively taking into account ambiguities and legal loopholes, and need to promote PACC's independency.

The Anti-Corruption Commission also seeks to strengthen preventive measures among the target parties that were identified in the National cross-sectoral anti-corruption strategy, which limits the request or offer of bribery through a set of procedures and tools.

The PACC has also implemented a set of studies with the aim of enhancing integrity and governance measures in institutions subject to the provisions of the Anti-Corruption Law. In this regard, a number of studies have been prepared to analyze the risks of corruption, in addition to a number of guides and support tools for assessing corruption risks.

Furthermore, PACC has launched two anti-corruption strategies since its establishment and outlined some activities and interventions that tackle reform efforts in the public sector. This is besides the National Cross-Sectoral Strategy (2021-2023), which has contributed to the government's national reform plan 2021-2023.

PACC currently is working jointly with Ministry of local Governance on several activities towards enhancing integrity & corruption prevention in the local governmental units as follows:

- 1- Submission of proposed amendments related to election law in the local governmental units (LGUs) by PAAC to the Council of Ministers.
- 2- Developing the Code of Conducts for the LGUs in coordination with the ministry of local government, taking into consideration the gender sensitivity and vulnerable groups.
- 3- Conducting an assessment study on the legal framework binding the relationship between Palestinian land & water settlement commission (PLWSC) and LGU's to summarise the results in a form of a fact sheet, and draft a standard Memorandum of Understanding (MoU) that shall frame the relationship between the PLWSC and the LGU's).

3.3 Linked activities:

PACC is currently implementing several programs and projects with the support of its partners, such as:

United Nations Office on Drugs and Crime (UNODC): Within the framework of cooperation with UNODC, a needs assessment was conducted. The assessment was reflected in a comprehensive concept note. None of the identified needed reforms were implemented so far. However, within the framework of technical assistance between PACC and UNODC, a mini project was carried out for the implementation of specialized trainings related to anti-corruption investigations and legislative drafting. Additionally, UNODC supported the Commission in developing an M&E system to follow-up on the implementation of the national Cross-Sectoral strategy and PACC's internal Strategy.

EUPOL COPPS: A quick-impact project was signed with EUPOL COPPS to strengthen the capacity of a financial disclosure system. EUPOL COPPS has supported PACC to conduct

workshops and trainings on anti-corruption topics (virtual training), such as training on financial investigations and witness protection.

World Bank: As part of its joint work and cooperation with the World Bank, several trainings and workshops were implemented on the concept of conflicts of interests, asset disclosure and the development of a questionnaire to measure corruption indicators.

GIZ: Within the framework of the cooperation between PACC and GIZ, a joint memorandum of understanding has been signed with the aim of strengthening preventive measures against corruption in Palestinian institutions, awareness-raising and capacity development in the area of integrity and accountability of the community and the staff of local bodies. Joint activities for the first phase are being implemented in cooperation with local government.

Geneva Centre for Security Sector Governance DCAF: Within the framework of the joint cooperation between the Commission and the Geneva Centre for Security Sector Governance, a joint memorandum of understanding has been signed to strengthen the institutional framework in the fight against corruption. The cooperation also supports the implementation of preventive measures in the security sector, providing comparative regional and international expertise and best practices to support the Commission and strengthen accountability and oversight measures. In addition, PACC has been supported by DCAF through awareness training workshops for the complaint units' staff, including the Ministry of the Interior

The United Nations Development Program (UNDP): In the framework of joint cooperation, work has been undertaken on the implementation of an agreement between the two sides on the development of network equipment within PACC. Work is currently under way on the Transparency and Accountability Enhancement Programme to support PACC in the area of witness and whistle-blower protection support.

The Organisation for Economic Co-operation and Development (OECD): as part of its coordination and networking with (OECD), PACC had recently participated in the annual meeting of the Business Integrity Network of MENA-OECD.

Council of Europe: Within the framework of cooperation, PACC has recently been integrated into SNAC 4 program supported by Council of Europe and European Union entitled "Regional Support for the Promotion of Human Rights, the Rule of Law and Democracy in the Southern Mediterranean countries".

The EU has two ongoing projects implemented by the OECD to support the Palestinians in the areas of Public Administration Reform (PAR) and Rule of Law (RoL):

- Public Administration Reform (PAR) project (2021-2024): The overall objective of the project is to support the Palestinian Authority in improving its overall governance capacity to manage the public administration for the ultimate benefit of citizens and businesses through more effective and efficient policy and service design and delivery. In particular, the project aims at enhancing the capacity of law and policymakers to:
 - o Develop a strategic framework for PAR,
 - o Support policy-development and co-ordination,
 - o Strengthen civil service and human resources management,

- Contribute to improving service delivery,
 - Assist in the organisational and functional set-up of the Centre of Government and selected areas.
- Enhance Governance and the Rule of Law (2020-2024): The overall objective of the project is to support the Palestinian Authority in achieving a more effective, transparent and participatory policy- and law-making process set in a clear normative framework, and thus enhance citizens and businesses trust in their government’s action. The project will aim at enhancing the capacity of law and policy-makers to:
- **Produce** clear, effective and transparent primary and secondary legislation;
 - **Use** efficient public consultation mechanism as part of the policy development process;
 - **Develop (and improve)** online tools providing access to adopted and draft legislation.
 - support the multiannual –reform framework under PEGASE including work with NGOs on transparency and oversight - CSO and other independent watchdog are fundamental actors in the fight against corruption

Memorandums of understanding with Arab and international counterparts

PACC has signed 17 memorandums of understanding at the international and Arab levels with a view to exchanging experiences and strengthening preventive measures in its work. Such cooperation agreements have resulted in exchanges of expertise and training courses, participation in conferences and submission of research papers with countries, including Kuwait, Jordan, Morocco, Tunisia, Egypt, Qatar, and Yemen.

PACC is also preparing programs and activities that may strengthen its capacity and allow for exchange of international experience with several international anti-corruption counterparts with whom PACC has signed memorandums of understanding in the following countries; Chile, Republic of Poland, France, Romania, Serbia, Tanzania, Italy, Germany, Nigeria, and China.

It is expected that a Twinning project will pave the way for more cooperation and coordination, in particular with European Union Member States.

3.4 List of applicable Union acquis/standards/norms:

- Council of Europe Resolution (97) 24 on Twenty Guiding Principles against Corruption 1997;
- Treaty on European Union on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union 1997;
- Council of Europe Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector;
- UN Convention against Corruption;
- United Nations Office on Drug and Crime (UNODC);
- Chapters of the EU acquis (Chapter 23, 24, and 32)

3.5 Components and results per component

Component 1: Review and modernise the national anti-corruption laws and policies in selected sectors to guarantee the implementation, and activation of these laws and policies with related institutions. Selected regulations include “The right to access

information”, and the legal framework binding the relationship between Palestinian land & water settlement commission (PLWSC) and LGU’s.

- Result 1: The national legal framework is made more supportive and institutionalized through developing clear mechanisms for implementing the Whistle-blowers, Witnesses and Experts’ Protection Regulation, with organized coordination mechanisms between law enforcement agencies;
- Result 2: employees in institutions are aware of transparency, accountability and related laws in the fight against corruption

Component 2: Enhance the capacities of PACC in assessing and managing corruption risks in selected sectors and in analyzing their anti-corruption environment, to develop baseline and indicators for guiding reform.

- Result 1: Developed operational manual on assessing and managing corruption risk
- Result 2: Developed operational tools to identify and monitor corruption cases
- Result 3: Developed baseline and indicators to measure the reform in the selected sectors
- Result 4: Competent staff trained in the use of the operational manual to assess progress in the selected sectors.

Component 3: Enhance the capabilities of PACC and stakeholders - public sector, private sector including the Media, and CSOs, in reaching out and enabling citizens to challenge corruption; contributing to the implementation of the National Anti-Corruption Strategy and PACC’s internal strategy to promote the values of transparency and integrity.

- Result 1: Trained staff capable of contributing to the promotion of the anti-corruption culture.
- Result 2: Citizens are more aware of the negative impact of corruption and more people are familiar with different corruption types and practices
- Result 3: More partners contributing to enhancing the capacities to combat corruption

3.6 Means/input from the EU Member State Partner Administration(s)*:

The implementation of the project requires one project leader (PL) with responsibility for the overall supervision and coordination of project activities. The PL will be supported by one resident twinning adviser (RTA) who will manage the implementation of project activities. The implementation of the project will also require three component leaders (CLs) and a pool of short-term experts (STEs) within the limits of the budget. The RTA will work directly with the PACC. It is essential that the team has sufficiently broad expertise to cover all areas included in the project description.

The interested member state will present a proposal detailing their strategy, methodology, approach, timetable, structure, and the quality of the expertise to be mobilised and should clearly show the administrative structure and capacity of the Member State entity and personnel. The interested Member State(s) shall include in their proposal the CVs of the designated PL and the RTA, as well as the CVs of the potentially designated CLs. In addition to the inclusion of a general description of the anticipated activities that will be further developed in cooperation with the twinning partner.

The Twinning project will be implemented in close co-operation between the partners aiming to achieve the mandatory results in sustainable manner.

The set of proposed activities will be further developed with the Twinning partners when drafting the initial work plan and successive rolling work plan every three months, keeping in mind that the final list of activities will be decided in cooperation with the Twinning partner. The components are closely inter-linked and need to be sequenced accordingly.

3.6.1 Profile and tasks of the PL:

High-ranking, committed Member State (MS) official or assimilated agent who heads the implementation of the twinning project, and formally signs all work plans/their updates.

Tasks:

- Coordinate and manage project to ensure timely and effective implementation in cooperation with the beneficiary country's Project Leader
- Co-chair the project Steering Committee meetings with the beneficiary country's PL.
- Follow up on the implementation of the work plan with the beneficiary country's PL, and make modifications to it when necessary.
- Coordinate with the experts of the Member State.
- Monitoring and evaluation of the project, track the progress against the budget, and take corrective decisions to keep the project on track when necessary.
- Responsibility for the interim and final reports with the beneficiary country's PL.
- Coordinate the deployment of short-term experts.
- Ensuring compliance with EU requirements.

Education, Experience & Skills:

- The PL should have a university degree in law, political science, criminal justice or a discipline relevant to the project, or equivalent professional relevant experience of 8 years.
- Minimum 3 years of experience at a senior managerial level in a ministry or regulatory authority of an EU MS.
- Minimum 3 years of specific experience working within or providing technical advisory services to anti-corruption bodies or investigating and prosecuting corruption cases in an anti-corruption agency, law enforcement, prosecution service or the judiciary, or working as technical adviser on anti-corruption in international organizations or NGOs.
- Proven professional experience in project management. At least 1 year experience in managing or assisting in managing projects on anti-corruption.
- Knowledge of EU legislation on anti-corruption.
- Comparative knowledge of national experiences.
- Computer literacy.
- Excellent written or oral command of English.

3.6.2 Profile and tasks of the RTA:

The Resident Twinning Adviser (RTA) will be appointed to reside in Palestine for the duration of the project, and will work under the supervision of the Member State PL and the Beneficiary Country PL.

Tasks:

- Providing technical advice on EU policies and best practices.
- Coordinate all the activities in the Beneficiary Country.
- Daily management of the project in the beneficiary institution.
- Coordinate the project implementation and propose corrective actions if required.
- Coordinate project activities (workshops, study visits, trainings etc.)
- Organize and participate in the Steering Committee meetings.
- Coordinate and provide assistance to the short-term experts.
- Draft the interim progress reports to be finalized by the PLs.
- Prepare regular project monitoring meetings/briefings.
- Networking with institutions relevant to this project and in EU MS
- Liaising with the EU Delegation;

Education, Experience & Skills:

- The RTA should have a university degree in law, political science, criminal justice, public administration or a discipline relevant to the project, or equivalent professional experience of 8 years.
- Minimum 3 years of technical experience in an anti-corruption agency or working as a technical adviser on anti-corruption in international organizations or NGOs.
- Proven experience in project management and coordination. Experience related to anti-corruption is preferred.
- Knowledge of the EU legislative framework
- Experience in overseeing, monitoring and evaluating projects
- Experience in report writing and critical analysis.
- Good communication skills.
- Computer literacy.
- Excellent written or oral command of English

3.6.3 Profile and tasks of Component Leaders:

A Component Leader will be assigned for each of the aforementioned three components. Component Leaders will ensure continuity and consistency within each of the fields concerned. The Member State shall designate for each component a short-term expert who, besides contributing directly to individual activities, acts as Component Leader and coordinates, in close cooperation with the RTA, the intervention of all other Member State experts mobilised for the same component. He will be responsible for delivering the mandatory results/outputs for the specific components.

Common tasks of Component leaders:

- Component coordination, guidance and monitoring;
- Conducting analysis of the area relevant to the component;
- Timely proposals for any corrective measures;

- Liaise with MS and PL and daily contacts with RTA counterpart

All the component leaders must have the minimum following qualifications and skills:

- University degree in similar discipline relevant to the component or equivalent professional experience of 8 years,
- Minimum 3 years of professional experience in the domain covered by the component.
- Fluency in written and spoken English.

3.6.4 Profile and tasks of other short-term experts:

Short-term experts will deliver their expertise under the overall responsibility of the Member State PL and the coordination and supervision of the RTA. Short-term experts are expected to perform specific tasks/activities. The detailed expert input shall be established when setting the Twinning work plan.

General Qualifications and Skills required for the short-term Experts:

- Relevant university degree or equivalent professional experience of 8 years,
- Minimum 3 years of professional experience in the domain for which they are mobilised,
- Experience in development cooperation; prior work in the Middle East region would be an asset,
- Excellent English communication skills, both spoken and written.

4. Budget

Maximum Budget available for the Grant is EUR 1.5 million

5. Implementation Arrangements

5.1 Implementing Agency responsible for tendering, contracting and accounting:

The Office of the European Union Representative (West Bank and Gaza Strip, UNRWA) will be responsible for tendering, contracting, and accounting.

Contact person: Shereen ABU-EID

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5.2 Institutional framework

The twinning project will support PACC that will cooperate with the EU Member State(s) to effectively and efficiently implement the project and to accomplish the anticipated results. Almost all the departments will have a role to a varied extent in the implementation of the project.

5.3 Counterparts in the Beneficiary administration:

PACC will assign a PL and an RTA counterpart which will act as the counterparts of the EU MS PL and RTAs; the PL and RTA counterpart will be staff of the Beneficiary administrations and will be actively involved in the management and coordination of the project.

5.3.1 Contact person:

Palestinian Anticorruption Commission

Mr Said Shehadeh

Position PACC; Advisor to the Commissioner

Postal address: Ramallah – Al Bireh 4091

5.3.2 PL counterpart

Palestinian Anticorruption Commission

Mr. Said Shehadeh

Position PACC; Advisor to the Commissioner

Postal address: Ramallah – Al Bireh 4091

5.3.3 RTA counterpart

Palestinian Anticorruption Commission

Ms. Sireen Awawdeh

Position PACC; Head of International and Local Cooperation Unit

Postal address: Ramallah – Al Bireh 4091

6. **Duration of the project**

Specify the execution period (number of months).

24 months

7. **Management and reporting⁶**

7.1 **Language**

The official language of the project is the one used as contract language under the instrument (English).

All formal communications regarding the project, including interim and final reports, shall be produced in English.

7.2 **Project Steering Committee**

A project steering committee (PSC) shall oversee the implementation of the project. The main duties of the PSC include verification of the progress and achievements via-à-vis the mandatory results/outputs chain (from mandatory results/outputs per component to impact), ensuring good coordination among the actors, finalising the interim reports and discuss the updated work plan. Other details concerning the establishment and functioning of the PSC are described in the Twinning Manual.

⁶ Sections 7.1-7.3 are to be kept without changes in all Twinning fiches.

7.3 Reporting

All reports shall have a narrative section and a financial section. They shall include as a minimum the information detailed in section 5.5.2 (interim reports) and 5.5.3 (final report) of the Twinning Manual. Reports need to go beyond activities and inputs. Two types of reports are foreseen in the framework of Twinning: interim quarterly reports and final report. An interim quarterly report shall be presented for discussion at each meeting of the PSC. The narrative part shall primarily take stock of the progress and achievements via-à-vis the mandatory results and provide precise recommendations and corrective measures to be decided by in order to ensure the further progress.

8. Sustainability

The Twinning project will work closely with PACC, and all relevant stakeholders to ensure that the beneficiaries obtain a clear sense of ownership of the project. This will help ensure the sustainability of the results. The Twinning project will also develop know how and very specific capacities at staff level. Dissemination of this knowledge with a philosophy of “train the trainer” will help ensure the sustainability of the results.

The project should utilize the recently conducted needs assessment funded by the UNODC which analyzed the PACC environment, performance, structure, and provided recommendations. Trainings will be tailored to address the recommendations and shortcomings. All materials and technical documents shall be translated into Arabic to maximise and ensure smooth dissemination.

9. Crosscutting issues

PACC places adequate emphasis on the application of the spirit and practice for the gender and human rights concepts, thus establishing a unit called Gender and Human Rights, run by competent staff to institutionalize and mainstream these crosscutting concepts.

PACC is working on enforcing a “go green” policy where electronic communication is prevailing against paper consumption.

PACC is committed to actively engage the civil society in most of its community activities. The “Coalition for accountability and integrity (AMAN)” is a member of the PACC board of directors. In addition, PACC coordinates with a number of NGOs and CSOs to preserve and promote transparency in its activities.

The project will further promote these concepts in the implementation of its various activities and results.

10. Conditionality and sequencing

Components and mandatory results to be implemented in this Twinning are strongly related to current activities of the beneficiary. The Twinning will fill in knowledge gaps and provide practical and timely support.

Within the scope of this project, PACC shall dedicate the qualified staff and appropriate space to ensure the smooth and effective implementation of the project in full cooperation with the EU member state(s) implementing the project.

No external conditions, including other technical assistance projects, preventing the achievement of the results of the Twinning project currently exist or are foreseen to exist during the implementation of the Project activities. Similarly, there is no need to sequence

the implementation of the Components as they can be implemented in parallel, without interfering with one another.

11. Indicators for performance measurement

Specific objective:

- Develop and revise national anti-corruption laws and policies in selected sectors to guarantee the implementation, compliance with, and activation of these laws and policies with related institutions.

Indicators:

- 1- Number of the developed and revised national anti-corruption laws and policies in varied institutions.
- Enhance the capacities of PACC in assessing and managing corruption risks in selected sectors, and analyzing their anti-corruption environment, to develop a baseline and indicators to guide reform.

Indicators:

- 1- Number of trained employees and % of those who have improved their competences based on entry and exit tests
 - 2- Number of risk assessments of the targeted institutions.
 - 3- Number of recommendations adopted by stakeholders in the field of corruption prevention and fortification.
 - 4- The number of developed indicators to measure the reform in selected sectors
- Enhance the capabilities of PACC and stakeholders in reaching out and enabling citizens to challenge corruption; contributing to the implementation of the National Anti-Corruption Strategy, and PACC's internal strategy to promote the values of transparency and integrity.

Indicators:

- 1- % increase of public awareness in the transparency and integrity practices of PACC
- 2- The number of complaints received by the Commission
- 3- % of complaints on which follow up has been taken
- 4- The change in the Percentage of followers/viewers of the Commission's websites
- 5- % increase in the number of implemented outreach activities..
- 6- % increase in the number of Male/ Female, youth and people with special needs participating in the Commission's activities

12. Facilities available

The beneficiary shall make available the necessary infrastructure for Member State(s) experts to carry out their tasks. The beneficiaries should provide equipped office space for the RTA, RTA assistant and short-term experts. The beneficiaries are expected to set up an office unit dedicated to the implementation of the project and to make available, free of charge, meeting rooms and space for training for the implementation of project activities and conference facilities, unless otherwise justified to use rented premises.

ANNEXES TO PROJECT FICHE

1. The Simplified Logical framework matrix
2. National Cross-Sectoral Strategy
3. PACC Anti-Corruption Strategy
4. Palestinian Anti-Corruption Law No. (1) of 2005 and its amendments
5. Gifts Regulation, Conflict of interest Regulation, Whistle-blowers, Witnesses and Experts' Protection Regulation
6. PACC Organizational Chart

ANNEX C1a: Simplified Logical Framework

	Description	Indicators (with relevant baseline and target data)	Sources of verification	Risks	Assumptions (external to project)
Overall Objective	Supporting democratic governance in Palestine by strengthening the ability of PAAC to promote transparency and integrity values in the society while rooting the measures of the corruption prevention.	The percentage of increase in confidence in the Commission’s anti-corruption efforts	Annual survey of a representative sample	Change in leadership	Outbreak of the COVID-19 or other crises Intensification of political and financial crisis
Specific Objective 1	Component 1: Review and modernise the national anti-corruption laws and policies in selected sectors to guarantee the implementation, and activation of these laws and policies with related institutions. Selected regulations include “The right to access information”, and the legal framework binding the relationship between Palestinian land & water settlement commission (PLWSC) and LGU’s.	1.1 Number of the developed and revised national anti-corruption laws and policies pertaining to varied institutions.	1.1 The official Gazette, and the annual reports of the Council of Ministers	Lack of cooperation from relevant stakeholders Lack of inter-ministerial cooperation	Outbreak of the COVID-19 or other crises Political reasons

<p align="center">Specific Objective 2</p>	<p>Component 2: Enhance the capacities of PACC in assessing and managing corruption risks in selected sectors and in analyzing their anti-corruption environment, to develop baseline and indicators for guiding reform.</p>	<p>2.1 Number of trained employees and % of those who have improved their competences based on entry and exit tests</p> <p>2.2 Number of risk assessments of the targeted institutions carried out.</p> <p>2.3 Number of recommendations implemented by stakeholders in the field of corruption prevention and fortification</p> <p>2.4 The number of developed indicators used by PACC to measure the reform in selected sectors</p>	<p>2.1 Annual training report</p> <p>2.2 Internal annual monitoring report</p> <p>2.3 Monitoring reports, studies and papers</p> <p>2.4 Internal reports. The recommendations and indicators are also sources of verification themselves</p>	<p>Lack of cooperation and resistance to change</p> <p>Lack of Cooperation by selected targeted Sectors in the provision of information</p>	<p>Outbreak of the COVID-19 or other crises</p>
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<p align="center">Specific Objective 3</p>	<p>Component 3: Enhance the capabilities of PACC and stakeholders - public sector, private sector including the Media, and CSOs, in reaching out and enabling citizens to challenge corruption; contributing to the implementation of the National Cross-Sectoral Anti-Corruption Strategy, and PACC's internal strategy to promote the values of transparency and integrity.</p>	<p>3.1 % increase of public awareness in the transparency and integrity practices of PACC</p> <p>3.2 N° of complaints received by the Commission</p> <p>3.3 % of complaints on which follow up has been taken</p> <p>3.4 The change in the Percentage of followers/viewers of the Commission's websites</p> <p>3.5 % increase in the number of implemented outreach activities.</p> <p>3.6 % increase in the number of Male/ Female, youth and people with special needs participating in the Commission's activities</p>	<p>Internal annual monitoring report</p> <p>Pre-and-Post surveys measuring public awareness of PACC performance.</p> <p>Report on website visitors and public interactions with the news and activities</p>	<p>Change in leadership</p> <p>Lack of cooperation by CSOs</p> <p>Lack of cooperation from the media houses</p>	<p>Outbreak of the COVID-19 or other crises</p> <p>Political reasons</p>
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<p>Component 1 - Mandatory results/outputs 1</p>	<p>1.1 The national legal framework is made more supportive and institutionalized through developing clear mechanisms for implementing the Whistle-blowers, Witnesses and Experts' Protection Regulation, with organized coordination mechanisms between law enforcement agencies;</p>	<p>1.1.1 Increase in the satisfaction of whistle-blowers and witnesses with protection measures</p> <p>1.1.2 Increased referrals from/ to law enforcement agencies</p> <p>1.1.3 % of employees informed about gift-receiving and conflict of interest by-laws</p>	<p>Annual monitoring; Focus groups; and Interviews with stakeholders</p> <p>Internal referral statistics</p> <p>A survey of a random sample of public sector employees</p>	<p>Lack of cooperation from relevant stakeholders</p>	<p>Outbreak of the COVID-19 or other health crises</p> <p>Political reasons</p>
<p>Component 1 - Mandatory results/outputs 2</p>	<p>1.2 employees in institutions are aware of transparency, accountability and related laws in the fight against corruption</p>	<p>1.2.1 N° of awareness-raising programs for employees in institutions on transparency, accountability and related laws in the fight against corruption</p> <p>1.2.2 Number of participants in awareness-raising training on corruption crimes and related regulations</p>	<p>Training reports</p> <p>Results of evaluation of exercises, trainers and training materials</p>		<p>Outbreak of the COVID-19 or other crises</p>
<p>Component 2 - Mandatory results/outputs 1</p>	<p>2.1 Developed operational manual on assessing and managing corruption risk</p>	<p>2.1.1 Status of the manual on assessing and managing corruption risks</p>	<p>Internal Assessment</p>	<p>Lack of cooperation and commitment</p>	<p>Outbreak of the COVID-19 or other crises</p>

Component 2 - Mandatory results/outputs 2	2.2 Developed baseline and indicators to measure the reform in the selected sectors	2.2.1 N° of indicators developed	Internal reports	Commitment and cooperation issues	Outbreak of the COVID-19 or other crises
Component 2 - Mandatory results/outputs 3	2.3 Competent staff trained in the use of the operational manual to assess progress in the selected sectors	2.3.1 N° of trainees and the number of training days carried out	Annual training report. Monitoring reports, studies and papers Focus groups	Lack of cooperation from stakeholders in the selected sectors	Change of Leadership in any of the selected sectors
Component 3 - Mandatory results/outputs 1	3.1 Trained staff capable of contributing to the promotion of the anti-corruption culture	3.1.1 The number of trainees and the number of training days carried out by the institution's team internally and externally	Annual training report.	Commitment and cooperation issues	Outbreak of the COVID-19 or other crises
Component 3 - Mandatory results/outputs 2	3.2 Citizens are more aware of the negative impact of corruption and more people are familiar with different corruption types and practices	3.2.1 % of change in citizen's awareness of the concepts and anti-corruption law	Surveys, reports and studies	Commitment and cooperation issues	Domestic opinion affected by certain corruption related circumstances.at the time of carrying out of the outreach activity/ies
Component 3 - Mandatory results/outputs 3	3.3 More partners contributing to enhancing the capacities to combat corruption	3.3.1 MoUs are signed, with dedicated focus on combating corruption	Interviews with a sample of specialists and stakeholders. Focus groups	Lack of cooperation of the partners	Change of Leadership in any of the selected sectors Lack of political will