UNDP/EUPOL COPPS Joint Programme

Strengthening Internal Police Accountability, National Anti-Corruption and Civilian Oversight

2011-2013

United Nations Development Programme - Programme of Assistance to the Palestinian People
EU Co-ordinating Office for Palestinian Police Support

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Programme Document

UNDP/EUPOL COPPS Joint Programme

Strengthening Internal Police Accountability, National Anti-Corruption and Civilian Oversight

Country: UNDP Programme of Assistance to the Palestinian People

UNDAF Outcome(s)/Indicator(s): N/A

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Expected Outcomes:
1. Internal Police Accountability Strengthened
2. National Anti-Corruption Efforts Strengthened
3. Civilian Oversight Strengthened

Executing Entity: UNDP/PAPP

Implementing Agency: UNDP/PAPP with technical assistance from EUPOL COPPS

Summary

The UNDP/EUPOL COPPS Joint Programme aims at promoting democratic governance based on the rule of law and respect for human rights. To this end, it seeks to strengthen internal police accountability, national anti-corruption efforts and the oversight role of civil society. In line with the Palestinian National Authority's National Development Plan: 2011-2013 (PNANDP) and related sector strategies – adopting a right-based approach and driven by development principles of national ownership, empowerment, participation and inclusion, the programme entails: (a) support to the Palestinian Civil Police (PCP) to strengthen internal police accountability; (b) assistance to the newly established Palestinian Anti-Corruption Commission (PACC) and Corruption Crimes Court (CCC) to enhance national anti-corruption efforts; and, (c) engagement of Palestinian civil society to promote civilian oversight. The overarching objective is to strengthen the social contract between the PNA and the people based on justice and security within the broader framework of the rule of law. This Joint Programme offers a timely opportunity for a holistic and sustainable approach to reinforcing democratic governance, as the PNA and its people prepare for an independent state.

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Table of Contents

1. INTRODUCTION 4

2. SITUATIONAL ANALYSIS 4

2.1 National Context 4

2.2 Problem Analysis and Counterpart Capacity 5

3. INTERVENTION LOGIC 9

4. PROGRAMMATIC INTERVENTIONS 11

4.1 Programmatic Interventions 12

Matrix of Outputs & Activities - Outcome 1: Internal Police Accountability Strengthened 15

Matrix of Outputs & Activities - Outcome 2: National Anti-Corruption Efforts Strengthened 19

Matrix of Outputs & Activities - Outcome 3: Civilian Oversight Strengthened 21

5. OWNERSHIP 22

6. MANAGEMENT ARRANGEMENTS 22

7. PARTNERSHIPS 24

8. RESULTS AND RESOURCES FRAMEWORK 26

9. BUDGET 27

10. MONITORING & EVALUATION 27

11. RISK ANALYSIS 28

12. LEGAL CONTEXT 41

1. INTRODUCTION

The rule of law is based on justice and security. These interdependent imperatives provide the foundation for democratic governance and the conditions for sustainable socio-economic development. Justice and security are mutually reinforcing. Together, they safeguard effective protection and democracy based on accountability, transparency and oversight – all so necessary to achieve human security and the full spectrum of civil, political, social, economic and cultural rights.

Human security – as opposed to national security, alone – is essential to establish a society in which people and communities live in freedom from fear and enjoy protection of their human rights. Human security premises that people be treated equally under the protection of the law; and, that people have access to resources and basic services, while also participating in the governance of their state.[1] In the occupied Palestinian territory (oPt), a wide range of PNA institutions have been entrusted to protect and deliver human security under challenging circumstances. It is therefore of vital importance that these institutions – not the least law-enforcement institutions, such as the Palestinian Civil Police (PCP) – are empowered to effectively manage the internal security needs in a manner that is consistent with the rule of law and good governance.

The overall objective of this Joint Programme is thus to strengthen the development of efficient and accountable law-enforcement institutions within the broader framework of the rule of law and democratic governance. In this vein, the Joint Programme will focus specifically on internal police accountability, national corruption efforts and civil society oversight. The goal is to address the normative dimension of law-enforcement and thereby complement the operational capacity development of the PCP, currently carried out by EUPOL COPPS. By partnering with UNDP, the Joint Programme adds a critical component of human rights, gender and the rule of law to the capacity development of the PCP.

Indeed, the professionalism of public institutions, such as law-enforcement, has both a technical and a normative dimension. Building technical professionalism of law-enforcement aims at enhancing proficiency to carry out core operational functions, such as: reporting, investigation of crime scenes or control of crowds. Strengthening the code of conduct and the respect for the normative framework ensures that the same operational functions are carried out in adherence with the law and with accountability to the civil authorities and the general public. In advancing citizen's protection, it is important to train and sensitize law-enforcement to recognize and address violations of human rights, including gender-based violence. To this end, law-enforcement personnel needs training to relate such crimes to the normative framework in domestic and international law, and to hold the same accountable against these standards.

In view of the above, and in line with the Palestinian National Authority's National Development Plan: 2011-2013 (PNANDP) and related sector strategies, the Joint Programme adopts a right-based approach and is driven by development principles of national ownership, empowerment, participation and inclusion. On this basis, the Joint Programme entails: (a) support to the Palestinian Civil Police (PCP) to strengthen internal police accountability; (b) assistance to the newly established Palestinian Anti-Corruption Commission (PACC) and Corruption Crimes Court (CCC) to enhance national anti-corruption efforts; and, (c) engagement of Palestinian civil society to promote civilian oversight. By bringing in a broader spectrum of institutions and stakeholders, a holistic approach is pursued to advance human security on the basis of the rule of law and, in so doing, promote democratic governance.

2. SITUATIONAL ANALYSIS

2.1 National Context

Against the backdrop of increased political turmoil at home, and the Arab Spring in the region, the Palestinian National Authority (PNA) - with the ongoing support of the international community –has sought to advance human security for Palestinians by continuing to strengthen its capacity to govern and gradually improve its performance in preparation for eventual statehood. While its ultimate objective, a free and independent state of Palestine within the 1967 borders, has not yet been realised, there is growing consensus that the PNA is indeed ready for statehood.[2]

[1] See the Palestinian Human Development Report 2009/10: *Investing in Human Security for a Future State* and the OECD/DAC Guidelines on Security Sector Reform and Governance (2005).
[2] UNSCO Report to the Ad Hoc Liaison Committee (18 September 2011).

In this context, it is important to note the PNA's sustained commitment to the basic principles of democratic governance and the rule of law. Building on the Palestinian Basic Law (amended in 2003) and the Programme of the Thirteenth Government - *Ending the Occupation, Establishing the State*, the new National Development Plan - *Establishing the State, Building our Future* (2011-2013) reaffirms the PNA's strong commitment to safeguard and uphold human rights and to consolidate good governance and the rule of law. As such, it identifies six strategic objectives:

- To provide national security and public safety throughout the country;
- To deliver justice and the rule of law for all citizens;
- To modernize and streamline public administration;
- To empower local government and bring public services closer to citizens;
- To attain financial independence and economic stability; and,
- To promote Palestine's sovereign presence in the international community.

In addition, the National Development Plan makes mention of the PNA's efforts to build an effective and efficient security sector, in which security agencies perform their assigned roles transparently and are accountable to the civil authorities. In line with the draft Security Sector Strategic Plan (2011-2013), the priority policies include:

- Complete the reorganisation of the security services into three branches separately accountable for policing, national security, and intelligence to the civilian political leadership;
- Strengthen the transparency and public accountability of the security services in order to build strong community relations with citizens and to ensure that the human rights of all citizens are respected without exception;
- Develop effective civilian government oversight and inspection systems in the Ministry of Interior and the security establishment; and
- Enhance the extent and quality of coordination between branches of the security services and with justice sector institutions.

Moreover, the PNA is committed to combat corruption in both the public and private sectors. Its commitment extends to strengthening public oversight bodies and mechanisms which will hold institutions and individuals accountable. To this end, the PNA has recently established the Palestinian Anti-Corruption Commission (PACC) and Corruption Crimes Court (CCC) that will play a key role in holding the public sector, as well as the private sector to account. In addition, the PNA recognizes the important role that civil society has in this regard, especially in the absence of a functioning parliament. As such, the PNA has stated in its National Development Plan that it seeks to "encourage more robust oversight of government performance by the civil society and non-governmental organisations."[3]

In the same vein, UNDP and EUPOL COPPS are committed to support the PNA in its efforts to promote the rule of law based on justice and security. By placing human security and people's rights at the centre, a stable environment can be created in which individuals and businesses will have the confidence to co-exist peacefully and make socio-economic investments in the future. Similarly, women and men alike, need assurances that they will be treated fairly and equally under laws that are enforced by disciplined security services and adjudicated by an independent and efficient judiciary. Therefore, the objective is to build not only operationally effective, but also accountable public institutions.

2.2 Problem Analysis and Counterpart Capacity

2.2.1 PCP Internal Accountability

Police accountability ultimately refers to the quality of police services provided. In this context, enhancing accountability requires that the police force operates in a service-oriented and effective manner, while also respecting standard procedures, rules and regulations and – above all – the law. This requires a careful balance between the need to protect and serve, on the one hand, and the need to maintain order, on the other hand. This illustrates the interrelation between justice and security. As such, enhancing accountability is not (exclusively) aimed at criticizing and reprimanding individual police officers, but should also lead to improve the overall performance by enhancing the organisational set-up, streamline business processes, and set (new) organisational priorities.

Recognizing that an appropriate balance between internal and external oversight mechanisms is necessary to ensure full transparency and accountability, three broad levels of police oversight are commonly identified:

[3]National Development Plan – Establishing the State, Building our Future (2011-2013).

1. *Internal oversight*. This refers to the processes through which police organisations ensure compliance with procedures, rules and regulations; process and investigate complaints and grievances; determine culpability of individual police officers while adhering to fair (civil) trial standards; and, ultimately, enforce professional conduct and behaviour;
2. *Civil oversight*. This refers to institutions, rules and processes through which the (democratically elected) government holds the police accountable for their policies, performance, and conduct;[4] and
3. *Social or civil society oversight.* This refers to groups within society that monitor the policies, performance, and conduct of the police. The media, human rights NGOs, women's rights organisations, and academic institutions often play active roles in this respect.

The Palestinian Civil Police (PCP) is one of the key institutions responsible for providing protection and safety and for creating a secure environment that is conducive to democratic governance and socio-economic development. As such, it is essential to ensure open dialogue and cooperation between the PCP and civil society. Public perceptions of, and engagement with, the PCP should provide a crucial communications and monitoring tool. As the PCP is endowed with extensive powers (pertaining to, *inter alia*, surveillance, investigation, search, seizure, arrest, interrogation and detention), it is critically important that the PCP safeguards the rights of the Palestinian people, ensuring full transparency and accountability.

As the PCP improves its capacity to carry out functions such as patrolling, traffic policing, criminal investigations and arrests, it is vital that their powers are kept in check. Moreover, it is equally essential that police activities focus on serving the actual needs of all citizens. While the PCP recognizes the need to be accountable – it is still unclear what this concept theoretically and practically means to the police. Beyond the work of EUPOL COPPS, no systematic efforts have been made to support the PCP in developing and implementing this concept into its every-day activities.

In response, and as described in its Strategic Plan (2010-2012), the vision and mission of the PCP is to become a transparent and accountable law enforcement institution capable of providing safety for all citizens based on the rule of law. The PCP Strategic Plan (2010-2012) embodies the desire to become a modern policing institution founded on professional police officers being able to meet the needs of citizens. The vision and mission of the PCP, as described in its Strategic Plan, is to be "*a transparent and accountable law enforcement agency that aims to guarantee (...) security and safety for all citizens on an equal basis. The PCP aims to work closely with other security institutions as well as civil society organisations to maintain safety and security and to promote a democratic society. The PCP performs [its] tasks in a transparent and accountable way (...). The PCP recruits, trains, and rehabilitates police personnel aimed at attaining the highest professional standards.*"

While the PCP is genuinely committed to adhere to these principles, it still grapples with translating these into action. It lacks a comprehensive strategy to enhance democratic control and accountability, perhaps stemming from the fact that efforts are still principally geared towards improving operational capacity (i.e. the technical component). According the Independent Commission for Human Rights (ICHR), 384 complaints were made against the PCP last year.[5] Reportedly, most were related to arbitrary arrest, protracted detention and ill-treatment. Various measures were taken by the PCP to address these complaints. In some cases, complaints were referred to the military prosecutor for legal action. However, there is a divergence between the number of complaints reported by the ICHR and the number of complaints received from the ICHR[6], according to the PCP. Currently, there is no system to properly track individual complaints and follow up on whether disciplinary measures are taken against the individual police officers involved.

Accountability and external oversight over the PCP, as well as other PNA institutions is hindered by the lack of a functioning Palestinian Legislative Council (PLC), where the civil oversight functions are concentrated. In the case of the PCP this is also affected by a relatively weak Ministry of Interior[7], the absence of a functioning Inspector-General's Office at the Ministerial level, as well as the absence of an appropriate legal framework regulating the work of the police. In the absence of a Police Law, there are only limited policies outlining the specific duties and responsibilities of each PCP member. Hence, the basic roles and duties of the police are not clearly defined. The Ministry of Interior is in the process of reviewing the draft Police Law, but in the absence of the PLC it is unlikely that it will come into force soon.

[4] While the Palestinian Legislative Council (PLC) is currently inactive, the Programme might be expanded to include civil oversight.
[5] This information is based on correspondence between the PCP and the ICHR, 2011.
[6] PCP claims that 29 complaints were sent to them.
[7] The Carnegie Papers - Policing the People, Building the State (February 2011).

Finally, the Law of Service for the Palestinian Security Forces No. 8. (2005), which also applies to the PCP, outlines certain corrective measures for professional misconduct, but the law is not fully understood and/or applied. Current internal police oversight practices do not reflect what is provided for in these articles. Internally, the PCP has developed a draft by-law to the 'Law of Service for the Palestinian Security Forces' pertaining to disciplinary procedures and regulations, which is currently under review by EUPOL COPPS. As it stands, PCP disciplinary matters still fall under the jurisdiction of the military courts, which impedes transparency and seems contradictory to the civil nature of the PCP.

Internal PCP Oversight Mechanisms

Currently, the three internal oversight bodies at the PCP are: the Inspector-General's Office (IGO); the Bureau for Grievances and Human Rights (BGHR); and the Police Security and Disciplinary Department (PSDD). The following provides an overview of their current mandates, roles and duties.

Inspector-General's Office (IGO)

The Inspector-General's Office (IGO), which was established on 18 December 2008, reports directly to the Chief of Police. Its establishment highlights the importance the PNA places on strengthening internal oversight and the need to comply with (internal) procedures, rules and regulations. The office currently consists of 30 staff, most of whom have a background in law and/or finance. However, most of them do not have any formal audit/inspection experience.

The IGO is responsible for, *inter alia*:

- Ensure that (internal) procedures, rules and regulations are being followed;
- Perform technical inspections of weapons and other equipment, ensuring they are being used in accordance with relevant rules and regulations;
- Review contracts, tenders and agreements to ensure best value for money;
- Evaluate operational and administrative plans and ensure proper follow-up; and
- Appraise the overall performance of the PCP.

Bureau for Grievances and Human Rights (BGHR)

The Bureau for Grievances and Human Rights (BGHR), which was established on 14 February 2009, is responsible for processing and investigating complaints and grievances, ensuring full adherence to national and international human rights standards. The Bureau, which currently employs seven staff, has established a separate subsidiary committee which deals specifically with complaints made by the ICHR.

The BGHR is responsible for, *inter alia*:

- Receive, process and investigate complaints and grievances, both from individual citizens and from national and international human rights organisations;
- Provide recommendations to the Chief of Police concerning these complaints and ensure proper follow-up;
- Prepare and analyze statistical data and provide policy advice;
- Ensure compliance with national and international human rights standards, e.g. by visiting detention cells and correctional facilities;
- Organize human rights trainings for PCP personnel; and,
- Raise public awareness of the BGHR and liaise with the media.

Police Security and Disciplinary Department (PSDD)

The Police Security and Disciplinary Unit (PSDD), which employs 134 staff across all districts, is responsible for investigating incidents of professional misconduct attributed to officers on the force. Furthermore, it provides the Chief of Police with recommendations about what disciplinary measures should be taken.

The PSDD is responsible for, *inter alia*:

- Receive, process and investigate complaints and grievances, and investigate cases of professional misconduct;

- Provide recommendations to the Chief of Police concerning their investigations and ensure proper follow-up;
- Liaise with the security services regarding PCP personnel; and,
- Foster discipline and ensure proper implementation of instructions and directives.

Based on the above, it is apparent that there is (still) no clear division of labour between these three internal oversight bodies. In fact, the PCP lacks the statistical data to monitor their performance in this regard and there seems to be some confusion as to how many cases are reported. There is no consistency on how citizen complaints are handled by the PCP, and it is difficult for the public to follow up or obtain results from their complaints. Based on extensive consultations with PCP senior management, conducted by EUPOL COPPS over the past years, an urgent need has been identified– and indeed agreed upon – to clarify mandates, develop proper standard operating procedures (SOPs), and strengthen the overall institutional capacity of these oversight bodies in order to improve the overall PCP capacity to achieve the strategic goals laid out in the different strategies.

PCP Gender Unit

Aimed at further improving the manner in which the PCP addresses the security needs of women, men, boys and girls, the PCP established a Gender Unit in May 2011 after long and sustained efforts from a number of internal and external stakeholders. This newly established body, the first one in the Arab region, is tasked with the responsibility to promote and integrate all issues related to gender. Currently, women make up 3% of the Palestinian police force. The work of the Gender Unit is essential to ensure that the work of the PCP addresses the human security needs of the entire population. The gender focal point's duty is to provide technical advice on gender equality and women's empowerment at both the strategic and operational level. However, the unit still lacks a comprehensive strategy and work plan, as well as sufficient resources to perform its duties and advance its agenda. Its' staff requires capacity-building and a variety of tools and resources to promote gender issues, both within the PCP and as an integral part of the wider PNA effort to advance the National Gender Strategy, which brings together the Ministry of Women's Affairs; Gender Units and Advisers in the Ministry of Interior, the Prime Minister's Office, and other relevant institutions.

Independent Commission for Human Rights (ICHR)

The role of the Independent Commission for Human Rights (ICHR) deserves specific attention as it is crucial in the oversight and accountability of Palestinian national institutions and their responsibility to uphold and promote human rights. As a national oversight mechanism, it plays an oversight role with Palestinian security institutions as a whole, including the PCP. The ICHR is presently discussing an MOU with the PCP, which will encompass several issues, including joint training activities and addressing complaints.

2.2.2 Palestinian Anti-Corruption Commission and Corruption Crimes Court

As mentioned in a recent World Bank publication, the PNA has of late enacted a number of new laws aimed at enhancing its anti-corruption efforts.[8]Notably, the PNA has enacted the Illicit Gains Law (2005), the Anti-Money Laundering Law (2007), and the Anti-Corruption Law (2010). The latter in particular constituted an important milestone: in addition to establishing an independent anti-corruption commission, the law introduced a number of 'new' corruption offences and enhanced the legal protection for so-called whistle-blowers.

However, confidence levels among the general public remain low. According to a recent public perception survey carried out by the World Bank, Palestinians still feel that the PNA is not doing enough to tackle corruption.[9]In its 2010 Annual Report, the Palestinian CSO, AMAN, stated that "there have been significant developments in the performance of the public sector in transparent recruitment procedures, procurement, and management of public funds, but further institution building support is needed to strengthen both the prosecution and prevention of corruption cases".[10]

Following the establishment of the Palestinian Anti-Corruption Commission (PACC) and the Corruption Crimes Court (CCC), and building on efforts made in the past by the AMAN-Coalition for Integrity and Accountability, further support is needed to ensure effective service delivery. The PACC has a wide mandate, according to the law which established it. It is tasked to

[8]World Bank - Improving Governance and Reducing Corruption in the West Bank and Gaza (2011).
[9] Ibid.
[10]AMAN - Corruption Report 2010. Available at: http://www.aman-palestine.org/Documents/Publication/CorruptionReport10.pdf.

receive, investigate, and potentially prosecute all cases related to corruption. It is also responsible for developing national-level policies, including a national anti-corruption plan and establishing mechanisms and procedures to prevent and address corruption in government institutions. The mandate of the PACC also includes public awareness and outreach campaigns, to change attitudes and behaviours. Finally, the PACC is also charged with maintaining income declarations of all public servants, starting with those in the West Bank. These obligations require the PACC to have a wide set of skills, and clear work priorities. While the PACC has made great strides in recent months including the development of a draft national anti-corruption strategy, staff levels (which as of December 2011 will stand at 30) still need to be enhanced in order to respond effectively to the increasing number of cases and responsibilities. Around 80 corruption files have already been transferred from the Attorney-General's Office (AGO), many of which are still pending due to the lack of capacity of the PACC to both investigate and prosecute cases.

The CCC commenced its work in October 2010. It is a specialized court composed of three first-instance judges. The head of the panel works full-time, but the remaining two judges divide their time between the CCC and the regular courts. At this time, the Chief Justice appoints the judges but no provisions have been made to address, for example, the duration of appointment or disciplinary action and removal. The CCC hears cases referred to it by the PACC. At present, the three-panel court is able to deal with the caseload but the number of cases is likely to increase significantly in the coming years, especially as the capacity of the PACC increases.[11]The CCC judges still require some additional skills training, as well as specific expertise on handling corruption cases.

In view of the above, institutional capacity development is needed at multiple levels to ensure that the PACC and CCC are indeed able to handle an increasing caseload, while attaining the highest levels of quality and integrity. As such, it is necessary to strengthen national capacities to, among other things, properly investigate and adjudicate corruption cases by improving evidence-gathering and investigative techniques. It is worth mentioning that the PACC could benefit from linkages to the existing UNDP Regional Programme on anti-corruption to which the PACC is a signatory to, allowing the PACC to make professional contacts with regional counterparts.

2.2.3 Civil Society Oversight

Public involvement in democratic oversight is crucial to ensure accountability, transparency and respect for human rights across the security sector. Proper public oversight ensures that security sector governance is upheld based on democratic principles and closely monitored against standards of accountability. In doing so, it paves the way for conditions that permit sustainable human development, such as: political inclusion, legal protection, economic opportunities and gender equality. In the context of the oPt, however, civil society oversight needs to be further empowered. As a result of the protracted Israeli occupation and internal political divisions, there is a reluctance to disclose information regarding the running of the security sector, including budget and personnel allocations. This hampers effective public oversight and its inherently potential leverage. Advocacy by civil society organisations representing the interests of local communities, professional networks, women and other stakeholders offers a strong voice and leverage to prevent and address abuses and corruption, while also providing a platform for contributing to the policy-making process. Indeed, a dynamic relationship between civil society and the PNA is an important indicator of the maturity of democratic structures.

However, the capacity of civil society organisations that exist varies. ICHR is one of the few organisations closely monitoring the security services. Others - like AMAN, Al-Haq, Sawa – All Women Together Today and Tomorrow, MADA – Palestinian Centre for Development and Media Freedoms, Palestinian Centre for Conflict Resolution and Reconciliation, Women's Studies´ Centre; and Institute for Women's Studies (Birzeit University) – will benefit from further empowerment to expand their monitoring work, engage in policy reform and exercise adequate leverage. Such empowerment is also in line with the Security Sector Strategic Plan (2011-2013), which specifically mentions the need to strengthen community relations to ensure full respect for human rights. This is an important entry point for integrating civil society in security sector governance. Thus, civil society empowerment will cut across the objective of this Joint Programme.

3. INTERVENTION LOGIC

Since 2006, the EU Co-ordinating Office for Palestinian Police Support (EUPOL COPPS) has contributed to the establishment of a sustainable and effective policing arrangement, closely linked to the overall criminal justice reform process. Through mainly EU Member State staffing contributions, EUPOL COPPS has placed police and rule of law advisers in a variety of

[11] Currently, there are approximately 20 cases pending before the CCC.

institutions, starting with the PCP and extending to various justice bodies, such as the Attorney General's Office (AGO) and the Ministry of Justice. Throughout the past few years, the PCP in particular has made great institutional advances, improving basic police skills. Indeed, the PCP is committed to becoming a modern and democratic police service. However, more work is required to advance respect for human rights and ensure a service-oriented approach that promotes genuine justice and human security. Thus, the PCP still needs to overcome a number of hurdles.

As PNA institutions and employees continue to improve their overall technical capacity, it is essential to strengthen the necessary institutional checks and balances to ensure that they are accountable to citizens. This means not only an expectation that these institutions actually ensure service delivery, but also that they do not abuse their powers while doing so. Conceptually, this requires a rights-based approach and a balance between security and justice under the broader framework of the rule of law.

Developed in close collaboration with the PNA, the Joint Programme seeks to ensure full complementarities, building on the expertise of both UNDP and EUPOL COPPS. EUPOL COPPS has long established relationships with the PCP, the PACC and the CCC. It is also able to provide technical knowledge in a number of areas. UNDP, with its expertise in governance, rule of law and sustainable development, is able to draw on its vast network of experts to complement EUPOL COPPS. By offering different sets of mutually reinforcing interventions, UNDP and EUPOL COPPS will optimize their comparative advantages to achieve a common objective. The programme overall rests on development principles of national ownership, inclusion, participation and empowerment. It is geared at tapping into existing capacities, encouraging dialogue, and capitalizing on the existing commitment to principles of democratic governance, as a means of achieving statehood.

In view of the above, the broader intervention logic of the UNDP/EUPOL COPPS Joint Programme is to place the rule of law, democratic governance and accountability at the centre. In line with the National Development Plan (2011-2013) and subsequent sector strategies, this programme is premised on a holistic approach. Similarly, enhancing accountability should be based on a whole-of-government approach, involving different ministries, departments and institutions, and a long-term development approach, rather than a short-term one which operates in silos. In a complementary fashion, support extends to stakeholders entrusted to uphold the principles of democratic governance such as the PCP, including its Gender Unit, the Palestinian Anti-Corruption Commission (PACC) and the Corruption Crimes Court (CCC), as well as civil society.

Another area relates to policy reform. The PCP - as a public institution - still faces numerous challenges since it is still a militarized force, rather than a service-oriented institution. Different police administrations and units work in silos with little cross-departmental communication and cooperation. In response, an alignment and improvement process has begun to change job descriptions, organisational structures and standard operating procedures (SOPs) on every-day police functions.

The focus of interventions will be geared at soft-ware. The PCP has only recently begun to realize that its aspirations cannot solely be met with 'hardware' components, such as infrastructure or equipment assistance. In response, the PCP strategy (and subsequent support requests) now encapsulates 'software' components, such as capacity-building and institutional transformation. It should be mentioned that, EUPOL COPPS advisers have been working closely with their PCP counterparts to systematically address many of the issues mentioned above. In 2012, at least eight PCP administrations will receive support through externally funded projects[12], combined with continued mentoring and advising from EUPOL COPPS. This large-scale support, which will be coordinated by EUPOL COPPS to ensure cohesiveness and complementarities, will address job descriptions, clarify organisational mandates and structures, identify and implement trainings, and develop SOPs for each PCP administration.

In the same vein, a shift or transformation towards decentralization in decision-making is required. That is a less centralized decision-making process that is not exclusively carried out at the highest level in PCP. To this end, support has commenced to decentralization to create a more responsive structure that accelerates decision-making and hence more efficient and rapid response. Conversely, operational support to the PCP will be complemented with efforts to promote a people-centred and rights-based approach to policing.

In this regard, strengthening the institutional capacity of the three internal oversight bodies is a precondition to developinga citizen-centred complaint system. As other externally funded projects, the programme will also entail clarifying organisational mandates, structures and implementing training programmes that will allow the PCP to adopt a people-centred approach to

[12] These administrations will receive support from The Netherlands (UNOPS), Spain (IMG), and the United Kingdom (UN Women).

service. This entails empowering through knowledge and attitudinal change to adopt and apply human rights in their code of conduct and redress towards greater accountability.

In the absence of proper parliamentarian oversight, it is also imperative to empower civil society as a cross-cutting objective. Since dialogue between the PCP and civil society is rare, it will be crucial to support CSOs to build their capacity in this area and also to sensitize the PCP to engage with them. By balancing the capacities on both sides (internal and external), the overall result should improve the performance of the PCP and – through civil society oversight - benefit the population at large.

Along a similar logic to increasing oversight of the PCP, the recently established PACC represents a firm commitment to tackle abuse of power and corruption. The absence of oversight and scrutiny by the PLC, ranging from the appointment of senior level civil servants to the review of budgets, has serious implications for the overall transparency of the PNA. Moreover, most PNA institutions still grapple with a variety of integrity and accountability issues, *inter alia*, vague financial and administrative procedures, no regulations on access to information, ghost employees, and placatory hiring and promotion of staff.[13]

The establishment of the PACC represents an important step in the process of tackling transparency and integrity issues. However, as identified in the 2010 Corruption Report, the PACC staff needs to be trained on how to effectively carry out their duties.[14]UNDP and EUPOL COPPS are already working with the PACC and the CCC to further develop their capacities.

4. PROGRAMMATIC INTERVENTIONS

As mentioned above, the programme will focus on knowledge and attitudes in further developing the institutional structures and capacities of the PCP internal oversight bodies, including the Gender Unit, as well as the PACC and CCC. The normative dimension of human rights, the rule of law and democracy will be embedded in all activities and interventions, as the core objective of the Joint Programme. This will be further reinforced by promoting civil society oversight through existing and strengthened capacities, so to enhance protection and foster dialogue between the state and the citizens.With regard to the PCP, the Joint Programme will complement and build on other interventions by international development actors[15].

In specific, the Joint Programme will:

- Develop an accountability strategy with regards to the PCP;
- Develop standard operating procedures (SOPs);
- Support to track complaints and evaluate response processes;
- Support to capacity development of the three internal oversight bodies (IGO, BGHR, PCDD);
- Increase awareness of PCP accountability mechanisms;
- Provide operational support to oversight bodies;
- Provide support to the PCP Gender Unit;
- Strengthen the institutional capacity of PACC and CCC;
- Develop staff capacity;
- Raise public awareness of the PACC and its services;
- Develop cross-cutting CSO engagement strategy; and,
- Provide comprehensive support package to CSOs to enhance civilian oversight.

Improving accountability and internal oversight mechanisms will involve the police organisation as a whole, as compliance also depends on transparent recruitment policies, good capacity-building including institutional transformation through awareness-raising, solid management, proper business processes, fair and equal career opportunities, retention and promotion of trained staff, and decent working conditions.

It will also require capacity development to ensure that the PCP is administered in full accordance with Palestinian domestic law as well as international human rights law and democratic principles. To this end, the legal framework, which outlines (and

[13] For a more comprehensive review see Aman - Corruption Report 2010. Available at: http://www.aman-palestine.org/Documents/Publication/CorruptionReport10.pdf.
[14] Ibid. p. 47
[15] These include projects implemented by UNOPS, IMG, and UN Women.

indeed limits) the powers bestowed upon the PCP, will be reviewed (in combination with strengthened oversight mechanisms) to ensure full compliance.

Addressing issues related to professional misconduct will have to be handled in such a way that it ensures buy-in and support at all levels of the organisation. Thus, programmatic interventions will be reinforced by policy-dialogue at all levels to ensure full PCP support for the proposed activities.

Since the Joint Programme aims at transferring specialized skills and expertise (i.e. how to handle a citizen complaint or conduct a corruption investigation of a high-level government official), external experts will be used to complement the skills and expertise that EUPOL COPPS advisers do not possess. In addition, external experts will be utilized to advance agendas on sensitive matters.

Based on the assumption that their case loads of PACC and CCC will increase significantly in the coming years, a national anti-corruption strategy will be developed to translate the PNA's strategic governance objectives into action. As these institutions were recently established, UNPD and EUPOL COPPS will focus on institutional capacity development, coordination with other relevant justice actors, and also entail public awareness campaigns.

Finally, the integration and inclusion of a civil society as cross-cutting sector will play an important role in advancing security-sector governance based on justice and human rights. The Joint Programme will conduct a comprehensive mapping study to ensure the implementation of an array of civil society oversight interventions, including research and analysis; representation and inclusive consultation processes; training, advocacy and awareness-raising. The mapping study will also address the issue of overlap of activities and funding.

In conclusion, while the two target components of the Joint Programme (PCP, PACC/CCC) are closely interlinked, the interventions have been designed to respond to the specific needs of each of the partner institutions and stakeholders. However, UNDP and EUPOL COPPS will actively endeavour to create linkages between the different interventions and ensure activities are carried-out in a mutually reinforcing manner. For instance, the PACC is the sole body responsible for investigating corruption cases; however, a specific programme activity will be geared towards solidifying the cooperation between the PACC and PCP when it comes to investigating cases. While civil society is not an isolated component in the programme, empowerment of the same will adopt an integrated approach and cut across the programme.

For each of the three outcomes, an exit strategy will be designed, as appropriate. The exit strategies will be drafted one year into the implementation. However, as this programme merely constitutes a first effort to sustainably improve accountability and transparency, it may be appropriate to develop a phase two of the programme. As such, the exit strategies will be continually analysed and adapted, as appropriate.

4.1 Programmatic Interventions

The interventions under this programme are three-fold:

Intervention 1: Support to the PCP to Strengthen Internal Accountability
Intervention 2: Support the PACC and CCC to Enhance National Anti-Corruption Efforts
Intervention 3: Support Palestinian CSOs to Promote Oversight

Intervention 1: Support to the PCP to Strengthen Internal Accountability

As highlighted in its Strategic Plan (2010-2012), the PCP aims to be a transparent and accountable law enforcement agency. However, it (still) lacks a comprehensive strategy which clearly outlines the roles and responsibilities of each of the three internal oversight bodies. Therefore, UNDP and EUPOL COPPS intend to assist the PCP in developing and adopting a comprehensive strategic planbased on the specific directives of the IGO, BGHR and PSDD.

Currently, there is no consistency or predictability on how the PCP internal accountability bodies operate – for instance, when citizens make complaints, the service they receive will greatly differ depending on who they meet, or where they file their complaint. Thus, establishing basic institutional frameworks will allow the PCP to more consistently and effectively manage their everyday operations.

As part of the strategy, clear SOPs must be established to ensure that the three internal oversight bodies work together in a mutually reinforcing and effective manner. Following the adoption of the strategy and the formulation of the SOPs, UNDP and EUPOL COPPS will provide support to develop and implement a detailed training programme aimed at translating the strategic plan into action.[16] In addition to promoting respect for international human rights norms and standards and compliance with the code of conduct, the training programme aims to develop critical skill sets to ensure proper implementation. In tandem, operational support will be provided to improve working conditions and, ultimately, improve service delivery.

The aforementioned activities will not immediately transform the PCP into a fully accountable institution, as this will also requirea gradual behavioural transformation. As such, the UNDP/EUPOL COPPS Joint Programme will actively contribute to introducing modern concepts of police accountability and to changing attitudes and mind-sets.

Linking up the different programmatic interventions, the programme will actively endeavour to build confidence and promote interaction between the PCP, civil society and the general public. While the relations between the PCP and civil society are strained, UNDP and EUPOL COPPS intend to actively nurture dialogue and debate. By providing opportunities for the PCP and civil society to discuss ideas and share concerns, the programme will allow for improved cooperation on security, justice and rule of law issues. In addition, the programme will also support conducting public awareness campaigns aimed at building trust and confidence amongst the general public. By doing so, it is hoped that more citizens will report on police misconduct.

Finally, UNDP and EUPOL COPPS aim to ensure gender-responsiveness in every aspect of the programme. As the PCP is gradually becoming more sensitive and responsive to the different needs of women and men, this will entail an ongoing process of assessing the implications for both sexes of any law, policy or action. As mandates are reviewed and SOPs are developed, UNDP and EUPOL COPPS will, in partnership with the PCP Gender Unit and CSOs, strive to ensure that women's as well as men's concerns and experiences are an integral dimension of the design and formulation so that all benefit equally and remain equally invested in governance and oversight of the security sector. The baseline perception surveys mentioned above will enable progress on institutional change to be measured from a gender perspective.

Gender Unit

The Chief of Police has recently appointed a gender adviser. Her work was initially met by resistance from (senior) PCP personnel but this situation is changing as they recognize the importance of having the first Gender Adviser in the Arab world. Building on the existing EUPOL COPPS interventions, the programme aims to support the efforts of the Gender Unit through activities focused on institutional transformation, as well as through a number of quick impact interventions. Given the relative newness of this unit, as well as the resistance it at times faces, activities need to be carried out in a flexible manner and when deemed appropriate by the gender team and acceptable by the PCP.

Inspector-General's Office (IGO)

The IGO needs to urgently enhance its audit and inspection functions as well as increase its capacity to adequately address allegations of mismanagement. In addition to reviewing its mandate and developing clear SOPs, UNDP and EUPOL COPPS intend to assist the IGO in the development of a proper inspection plan. To ensure that inspections are carried out by qualified staff, UNDP and EUPOL COPPS will conduct specialised training for relevant IGO staff.

Bureau for Grievances and Human Rights (BGHR)

Recognizing its fundamental role to address complaints filed by citizens against the PCP, the programme will focus specifically on raising public awareness of the BGHR and its role within the larger PCP structure. Special attention will be paid to aligning the BGHR with the ICHR and signing a memorandum of understanding. Aimed at promoting its services and building confidence among the general public, the BGHR will organise a series of sensitization workshops targeting civil society, with emphasis on human rights groups and academia, and the media.

To ensure that complaints are received and processed in a timely and professional manner, UNDP and EUPOL COPPS will also provide capacity development support to all BGHR staff. This will entail, *inter alia*, enhancing (external and internal) communication skills, improving writing skills, and streamlining internal reporting mechanisms. In addition, UNDP and EUPOL

[16] UNDP and EUPOL COPPS will ensure close cooperation with the PCP Training Administration.

COPPS will assist the BGHR in strengthening its administrative support to other relevant bodies conducting investigations and in developing a computerised complaints system in order to analyse trends and propose remedial action.

Police Security and Disciplinary Department (PSDD)

With 134 staff, the PSDD is responsible for investigating incidents of professional misconduct and providing recommendations for disciplinary measures. Its role is not only to process and investigate complaints but also to foster discipline and ensure adherence to the PCP mission and mandate.

In addition to clarifying its role and reviewing its organisational structure, UNDP and EUPOL COPPS will assist the PSDD in conducting a series of trainings on integrity, ethics and gender equality for all PCP staff. Aimed at strengthening adherence to democratic principles, particularly accountability to the civil authorities and the general public, and promoting respect for international human rights norms and standards, it is hoped that the trainings will help change mind-sets and ensure that the PCP becomes more sensitive and responsive to the diverse human security needs of the Palestinian people.

Currently, the mandates of the different internal oversight bodies clearly overlap. From a citizen's perspective, it is not always clear how to file a complaint and seek (legal) redress. As such, it will be important to properly delineate roles and responsibilities and to translate these into proper SOPs. As such, UNDP and EUPOL COPPS will focus on strengthening professional skills and institutional capacity to address any weaknesses, thereby promoting accountability and transparency, establishing proper monitoring and evaluation of services delivered, and alleviating negative perceptions of PCP professionalism and competence among the general public. Once the capacity of these institutions has been built, one of their responsibilities will be to conduct both internal and external awareness campaigns to improve the functioning of accountability mechanisms.

Matrix of Outputs &Activities - Outcome 1:InternalPolice Accountability Strengthened[17]			
	IGO (staff: 30)	**BGHR (staff: 7)**	**PSDD (staff: 134)**
Output 1.1: Support the development of an accountability strategy	Activity 1: Carry out series of workshops with the three internal oversight bodies to review mandates and adopt accountability strategy (EUR 75.000).		
	Activity 2: Review and disseminate PCP code of conduct (EUR 10.000).		
	Activity 3: Train all PCP staff on code of conduct (EUR 30.000).		
Output 1.2: Enhance organisational set-up of internal oversight bodies	Activity 4: Analyse and assess the current set-up of the IGO and provide recommendations to enhance the organisational structure in conjunction with Human Resources (EUR 20.000).	Activity 4: Analyse and assess the current set-up of the BGHR and provide recommendations to enhance the organisational structure in conjunction with Human Resources (EUR 15.000).	Activity 4: Analyse and assess the current set-up of the PSDD and provide recommendations to enhance the organisational structure in conjunction with Human Resources (EUR 25.000).
Output 1.3: Develop standard operating procedures (SOPs)	Activity 5: Develop SOPs for IGO (EUR 30.000).	Activity 5: Develop SOPs for BGHR (EUR 30.000).	Activity 5: Develop SOPs for PSDD (EUR 30.000).
	Activity 6: Assist in organizing inspections and establishing effective reporting mechanisms. (EUR15.000).	Activity 6: Develop writing skills and assist in establishing effective reporting mechanisms (EUR 10.000).	Activity 6: Develop writing skills and assist in establishing effective reporting mechanisms (EUR 10.000).
Output 1.4: Support capacity development of internal oversight bodies	Activity 7: Assess training needs of staff and assist in development and implementation of training plan (EUR 40.000).	Activity 7: Assess training needs of staff and assist in development and implementation of training plan (EUR 30.000).	Activity 7: Assess training needs of staff and assist in development and implementation of training plan (EUR 60.000).
	Activity 8: Organize study trips to expose relevant PCP staff to international best practices on police oversight and accountability, e.g. police ombudsman institutions (EUR 95.000).		
Output 1.5: Increase external and internal awareness of PCP accountability mechanisms		Activity 9: Use the media to raise public awareness of BGHR and its services. Organize sensitization workshops targeting civil society, including human rights groups and academic institutions (EUR 90.000).	Activity 9: In conjunction with the PCP training administration, build on previous awareness-raising activities on integrity, ethics and gender equality, extending theseto all PCP staff (EUR 175.000).
Output 1.6: Provide equipment to internal oversight bodies	Activity 10: Procure equipment and office supplies based on needs assessment (EUR 50.000).		
	Activity 11: Assist in development of computerised complaints system, including a statistical database (EUR 100.000).		
Output 1.7: Provide support to PCP Gender Unit	Activity 12: Provide financial support to EUPOL COPPS Gender Unit to conduct quick impact projects (EUR 60.000).		

[17]For a complete overview of outputs, outcomes and indicators, see the Results and Resources Framework (Section 8).

Total Cost of Intervention 1: EUR 1.000.000

Intervention 2: Support to the PACC and CCC to Enhance National Anti-Corruption Efforts

Based on the PNA's strong commitment to tackle corruption and encourage foreign investment, UNDP and EUPOL COPPS intend to support the development of a national anti-corruption strategy spearheaded by the PACC and CCC. In view of the recent enactment of a series of anti-corruption laws, UNDP and EUPOL COPPS will provide a comprehensive support package aimed at strengthening institutional capacity, improving coordination between relevant justice actors, and expanding public outreach.

It is well documented that corruption left unchecked severely hampers respect for human rights and economic growth, while undermining a government's ability to provide basic services and justice. As such, the Joint Programme endeavours to work closely with the PACC and CCC to fight corruption and establish a culture of accountability across the oPt. In addition to developing a national anti-corruption strategy, efforts will be geared towards formulating clear SOPs and adopting a comprehensive code of conduct. By doing so, UNDP and EUPOL COPPS seek to strengthen their capacity to properly investigate and adjudicate an increasing caseload. Dovetailing these efforts, the development of an IT platform to streamline business processes and improve information management will be essential.

Following the success of the introductory training programme conducted by EUPOL COPPS, it was identified that additional trainings to further develop staff capacity is still needed. Consequently, UNDP and EUPOL COPPS plan to implement a detailed training programme targeting not only prosecutors and judges but also support staff. Aimed at developing critical skill sets, the programme will provide tailor-made trainings, exposing PACC and CCC staff to best practices and linking them to international networks. In view of the complexity of the subject matter, the training will include the following topics:

- Definitions, causes and effects of corruption
- Legal aspects of combating corruption
- International legal instruments on corruption
- International human rights law
- Integrity, ethics and gender equality
- Investigative techniques
- Interrogation of suspects and witnesses
- Information management
- Case management
- Rules of evidence
- Financial investigations of corruption
- International legal cooperation
- Recovery of assets
- A variety of other topics, as needed for the PACC staff.

In addition to the trainings, a critical component of the programme is to improve coordination and cooperation between the various justice actors through a series of seminars and conferences. By bringing together officials from the PCP, AGO, HJC, PACC, CCC and MOJ, the seminars and conferences will provide an opportunity to foster cross-fertilization and create synergies.

While it is imperative to further develop staff capacity, it is equally important to raise community awareness and build public trust. Through a series of targeted media campaigns, the programme will raise confidence levels and reduce negative perceptions of the PACC/CCC and the PNA anti-corruption efforts at large. The impact of these campaigns will be linked to the overall monitoring system and will evaluate increases in the uptake of cases disaggregated by sex, age and location.

The programme will be linked to regional efforts to combat corruption. Although international legal cooperation mechanisms exist worldwide, the PNA has had difficulty taking full advantage of these resources due to the protracted Israeli occupation. Following a regional workshop[18] organized by UNDP's Regional Centre in Cairo/Beirut (RCCB) and the successful introduction of UNDP's integrity index tool at the municipality level, it was further agreed that UNDP would support the development of PACC's institutional capacity, including the further development of the national anti-corruption strategy.[19]

As mentioned previously, UNDP and EUPOL COPPS are committed to mainstreaming gender throughout this initiative. In addition to ensuring that gender equality features prominently in the training programme, the programme

[18] "Voice and Accountability for Improved Service Delivery" (UNDP/RCCB, October 2010).
[19] The Ministry of Local Governance formally adopted the integrity index tool in late 2010. Following a trial period, the Ministry of Local Governance decided to expand its use across the oPt.

will ascertain that gender is properly addressed in the national anti-corruption strategy as well as the SOPs and code of conduct. Building women's capacity and confidence to identify and report corruption safely will be a focus of the programme, and men will be sensitised to enable them to work effectively with women, particularly as their numbers increase in the PACC and CCC, and gender equality becomes more entrenched institutionally.

Matrix of Outputs& Activities - Outcome 2: National Anti-Corruption Efforts Strengthened			
	PACC	**CCC**	**PCP**
Output 2.1: Strengthen the institutional capacity of the PACC and CCC	Activity 1: Support the PACC in developing national anti-corruption strategy (EUR 60.000).		
	Activity 2: Support the PACC in developing strategic plan, including a mission statement, work plans and M&E framework (EUR 60.000).		
	Activity 3: Launch an IT platform designed to streamline business processes and improve information management (EUR 70.000).	Activity 3: Procure equipment and office supplies based on needs assessment (EUR 50.000).	
	Activity 4: Review and disseminate PACC code of conduct (EUR 15.000).		
	Activity 5: Develop SOPs for PACC, including on cooperation with PCP (EUR 75.000).		
	Activity 6: Strengthen international and regional cooperation, including through UNDP's regional initiative on anti-corruption (n/a).		
Output 2.2: Develop staff capacity of the PACC and CCC	Activity 7: Assess training needs of staff and assist in development and implementation of training plan (EUR 230.000).		
	Activity 8: Organize seminars and conferences aimed at improving coordination and cooperation between the PACC and other justice sector institutions (EUR 75.000).		
Output 2.3: Raise public awareness of PACC and its services	Activity 9: Use the media to raise public awareness of PACC and its services. Organize sensitization workshops targeting civil society, including human rights groups and academic institutions (EUR 80.000).		
	Activity 10: Develop and produce information booklets and brochures for dissemination among the general public (EUR 10.000).		
Total Cost of Intervention 2: EUR 725.000			

Intervention 3: Support to Palestinian CSOs to Promote Oversight

UNDP and EUPOL COPPS recognize that CSOs have an important role to play in enhancing civilian oversight and ensuring that the PCP respects human rights, including women's protection, and is accountable to the civil authorities and the general public. While not creating a separate component, civil society support will be integrated across the board.

Mindful of the fact that development partners are already supporting civil society in various ways, and building on ongoing efforts, the Joint Programme will focus on the following complementary activities in support of civil society: (a) conduct a comprehensive mapping; (b) conduct comprehensive consultation process; and, (c) produce a plan/engagement strategy for approval and implementation.

Based on the findings of (a) and (b), the engagement strategy (c) will be presented to the donors within six months of the programme start-upfor review and approval.Once approved, the engagement strategy will: (d) be implemented in support of civil society oversight.

Matrix of Outputs & Activities - Outcome 3: Civilian Oversight Strengthened	
	CSOs
Output 3.1: Develop CSO engagement strategy	Activity 1: Conduct comprehensive mapping study (EUR 45.000)
	Activity 2: Conduct consultations with PCP, CSOs and civilian oversight mechanisms (EUR 5.000)
	Activity 3: Prepare engagement strategy (N/A).
Output 3.2. Implementation of approved engagement strategy	Activity 4: Implement engagement strategy based on findings produced under Output 3.1 and following approval of implementation plan by development actors (EUR 190.000)
Total Cost of Intervention 3: EUR 240.000	

5. OWNERSHIP

National ownership is essential to ensure sustainability. A guiding principle and operational modality of UNDP programming, national ownership is inherently embedded in the implementation of the programme. The programme has not only been designed in close consultation with national counterparts, but has been vetted by all relevant national partners. In the same spirit, the programme will be implemented with full Palestinian ownership, which is secured by an exclusive Palestinian team representing UNDP that complements the PCP/EUPOL COPP's Joint Project Teams, overseen by the Palestinian Ministry of the Interior.

The activities outlined in this document build on existing and trusted partnerships between UNDP, EUPOL COPPS and national counterparts: PCP, MOI, PAC and CCC. These are partnerships that have been cultivated over time and have translated into genuine trust and confidence. To this end, the programme's outputs, outcomes and activities have undergone an examination and approval by relevant national partners:

- PCP-wide needs analysis conducted by the PCP Research, Planning and Development Administration (RPDA), other relevant PCP bodies and EUPOL COPPS advisers.
- Reviewed and validated by the heads of each PCP unit, including the head of the RPDA.
- Supported by the Programme Steering Committee (PSC), which examines and recommends all project-based assistance for the PCP for approval by of the Minister of Interior and the Chief of Police.

During the implementation phase, national ownership will be secured through:

- Close monitoring by the PSC, which will receive implementation support from a Project Field Committee (PFC).These PSC and PFC will not only track progress, but also ensure that PCP needs are being met.

Similarly, the programme activities aimed at supporting the PACC and CCC have been developed in partnership with the national counterparts based on existing working relationships. As such, the activities for the PACC and CCC have been jointly reviewed and validated. UNDP and EUPOL COPPS will continue to work closely with the PACC and CCC to monitor progress and jointly resolve obstacles. As for the civil society element, the implementation is focussed on consultations, dialogue and local capacities, which by default entails strong national ownership in driving the oversight process.

Overall, the programme only builds on existing capacities and hitherto successful partnerships with national counterparts. Thus, rather than creating parallel *forums* and placing an additional burden on each of the partner institutions, the programme aims to build as much as possible upon existing structures, such as the PCP PSC, Security Sector Working Group (SSWG) and Justice Sector Working Group (JSWG).

Finally, to ensure proper programme oversight and guidance, a Programme Board will be established, co-chaired by the relevant PNA institutions, so as to drive the strategic direction of the programme.

6. MANAGEMENT ARRANGEMENTS

The programme will be implemented in partnership with relevant PNA institutions, in particular the PCP, PACC, and CCC, as well as CSOs. UNDP will be responsible for managing the programme in accordance with its financial rules and regulations, while EUPOL COPPS will provide technical advice and capacity development support. Both UNDP and EUPOL COPPS will ensure national ownership at every step, particularly as a means of achieving sustainability.

Programme Team

The Programme Team will be comprised of nine staff. The Programme Manager – with the support of the Finance/Procurement Officer - is tasked with the day-to-day management, ensuring that the programme produces the expected results in accordance with the Programme Document and subsequent work plans. In addition, s/he is responsible for issuing narrative and financial reports to account for resources allocated and results achieved. While UNDP will recruit two national technical experts, EUPOL COPPS will assign five already deployed experts to implement specific components of the programme. The MOU outlining the roles and responsibilities of both UNDP and EUPOL COPPS is annexed to the Programme Document.

It is important to note that EUPOL COPPS will continue to provide the PSC with technical advisorysupport. In addition, a Project Field Committee (PFC) will be established. Comprised of relevant PCP counterparts, including a representative from the Research, Planning and Development Administration (RPDA), as well as a EUPOL COPPS Police Adviser, the PFC will oversee the implementation of the programme and will report to the PSC.

Programme Board

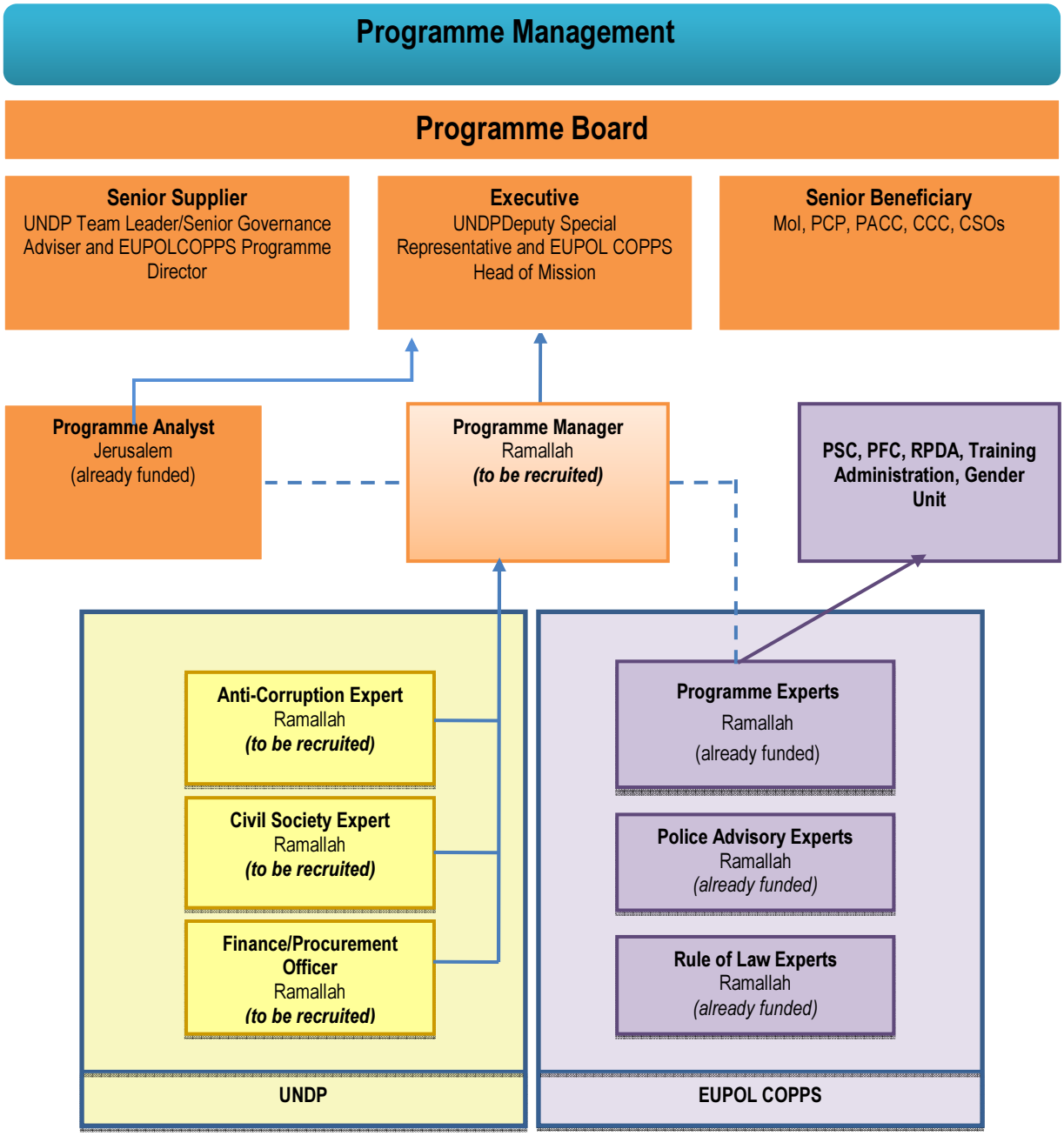
Aimed at bringing together key actors and stakeholders, a Programme Board will be established to review the strategic direction of the programme, ensuring accountability and proper oversight.[20] The board meetings will also provide a transparent forum for stringent quality control and review of progress. This will entail determining deliverables and achievement of benchmarks, alongside opportunities for fine-tuning and adjustments.

The Programme Board, which will meet twice a year and be comprised of the MoI, PCP, PACC, CCC, UNDP, EUPOL COPPS and donors/development partners. Additional *ex officio* members may be added to guarantee adequate representation of Palestinian CSOs. In addition to ensuring accountability, the Programme Board will examine and reinforce linkages with, *inter alia*, UNDP's Local Governance and Rule of Law & Access to Justice Programmes and the numerous EUPOL COPPS interventions in the security sector. Finally, the Programme Board will feed into other existing coordination mechanisms, such as the PSC, PFC, SSWG and JSWG.

[20] As per UNDP rules and regulations, the Programme Board will be co-chaired by the PNA; UNDP will act as the Secretariat.

Management Structure

The organisational chart for the programme is as follows:



7. PARTNERSHIPS

Partnerships are essential to achieving success with the programme. This entails close and open partnership between UNDP and EUPOL COPPS, national partners and stakeholders, development partners, the broader UN system and beyond. To this end, the programme will invest significantly in tapping into existing partnerships and form new ones. The challenges involved in the establishment of effective development partnerships should not be understated as each side of a development partnership brings to the table its own political and cultural preconceptions. Thus, confidence-building, the creation of an environment conducive to candid communication, and the maintenance of a flexible approach and open communication are all critical to achieving successful results.

The chief partners include:

EUPOL COPPS - The EU Coordination Office for Palestinian Police Support assists the PNA in enhancing human security by providing technical advice and guidance in the areas of policing, criminal justice and the rule of law. As such, EUPOL COPPS offers capacity development support to the PCP in a variety of areas, including gender. EUPOL COPPS also supports the development of an effective and accountable criminal justice sector that complies with international human rights norms and standards.

Given the recognized achievements by EUPOL COPPS thus far in building the capacity of PCP and other justice sector institutions, there exists indeed a platform, confidence and trust to take these partnerships to a new level – one that complements substantive operational training with that of a normative framework of human rights, gender, justice and related accountability.

UNDP – Within its Programme of Assistance to the Palestinian People (PAPP), UNDP enjoys a long-standing and trusted partnership with all ministries of the PNA. Under the leadership of the PNA, UNDP provides capacity development in the areas of Governance, Poverty Reduction, Environment and Infrastructure. In advancing sustainable human development, it has adopted a rights-based approach that focuses on the root-cause and on empowering national institutions, communities and civil societies based on development principles of national ownership, empowerment and inclusion. Through its 'Development for Freedom' consolidated plan 2012 – 2014, UNDP will ensure close linkages and synergies between the programme, its development mandate and the PNA's statehood efforts.

Within its Governance portfolio, UNDP provides support to all three branches of government, civil society organisations and the private sector. In addition to its Local Governance and Public Administration Programmes, UNDP recently launched a major Rule of Law & Access to Justice Programme which focuses on: 1) strengthening the capacity of rule of law institutions; 2) enhancing access to justice, particularly for vulnerable groups; 3) promoting gender and juvenile justice; 4) initiating rule of law in the Gaza Strip; and 5) building confidence among stakeholders. In addition, UNDP chairs the UN Country Team's Sector Area Group (SAG), which offers an opportunity for engaging the broader UN system in support of the UNDP/EUPOL COPPS Programme.

Other actors will be engaged both in a consultative process and complementary fashion, includingthrough a range of coordination forums, such as:

- **Security Sector Working Group**
- **PCP Programme Steering Committee**
- **Justice Sector Working Group**
- **Governance Sector Area Group (SAG)**
- **Protection Cluster**
- **Legal Task Force**
- **Gender Task Force**

In specific, the following agencies/organisations may play an important partnership role:

UNODC - The United Nations Office on Drugs and Crime provides support to the Correctional and Rehabilitation Centres Department (CRCD) by strengthening the operational management and oversight of prisons. Through general and specialised training of correctional staff, vocational training for prisoners, and improved health care for inmates, UNODC, in partnership with the PNA, aims to achieve sustainable reform in accordance with international standards. With a view to establishing a solid foundation for institutional reform, UNODC is currently developing a comprehensive national programme under the framework of its Regional Programme on Drug Control, Crime Prevention and Criminal Justice Reform in the Arab States (2011-2015).

OHCHR – The High Commissioner for Human Rights conducts monitoring and reporting, while also providing capacity development to institutions and civil society. OHCHR serves as the Chair of the Protection Cluster. The main objective of OHCHR Palestine for 2006-2007 is to implement the High Commissioner's Plan of Action and Strategic Management Plan (2006-2007) in the OPT. This entails strengthening and activating mechanisms and capacities for the protection and promotion of human rights based on partnerships and project activities.

UN Women -Created in July 2010, UN Women assists Member States in accelerating progress towards their national goals on gender equality and the empowerment of women. In addition, it holds the UN system accountable for its own commitments on gender equality. In the oPt, UN Women has facilitated the development of a national strategy to combat sexual and gender-based violence (SGBV) and it currently implements a gender-focused programme targeting the security and justice sectors.

ICHR - the Independent Commission for Human Rights was established in 1993 upon a Presidential Decree issued by the former President Yasser Arafat. The Decree was subsequently published in the Official Gazette in 1995. In accordance with the Decree, the duties and responsibilities of ICHR are as follows: "to follow-up and ensure that different Palestinian laws, by-laws and regulations, and the work of various departments, agencies and institutions of the State of Palestine and the Palestine Liberation Organisation meet the requirements for safeguarding human rights". The Decree entrusted ICHR with the drafting of its statutes in a manner that would ensure its independence and effectiveness.

DCAF - The Geneva Center for Democratic Control of Armed Forces is an international foundation which focuses on policy-relevant research and analysis on the current state of Palestinian security institutions. It works closely with CSOs that help give a voice to marginalised groups, opening up the policy-making process to a wider set of perspectives. DCAF's work is underpinned by the belief that human security and the rule of law are essential preconditions for sustainable peace and development.

All interventions will be closely coordinated with national and international stakeholders. Other partners might be identified throughout the lifespan of the programme if specific expertise is required and not found among the partners listed above.

8. RESULTS AND RESOURCES FRAMEWORK

See attached Excel sheet.

9. BUDGET

The estimated budget covers an 18-month implementation period starting 1 December 2011.

Description	Period	Budget (EUR)
Outcome 1: Internal Accountability Ensured		
Output 1.1: Support the development of anaccountability strategy	18 months	115.000
Output 1.2: Enhance organisation set-up of internal oversight bodies	18 months	60.000
Output 1.3: Develop standard operating procedures (SOPs)	18 months	125.000
Output 1.4: Support capacity development of internal oversight bodies	18 months	225.000
Output 1.5: Increase external and internal awareness of PCP accountability mechanisms	18 months	265.000
Output 1.6: Provide equipment to internal oversight bodies	18 months	150.000
Output 1.7: Provide support to the PCP Gender Unit	18 months	60.000
	Sub-Total	**1.000.000**
Outcome 2: National Anti-Corruption Efforts Enhanced		
Output 2.1: Strengthen the institutional capacity of the PACC and CCC	18 months	280.000
Output 2.2: Develop staff capacity of the PACC and CCC	18 months	305.000
Output 2.3: Raise public awareness of PACC and its services	18 months	140.000
	Sub-Total	**725.000**
Outcome 3: Civil Society Oversight Promoted		
Output 3.1: Develop CSO engagement strategy (mapping, consultations, produce engagement strategy)	6 months	50.000
Output 3.2: Implement engagement strategy based on findings produced under Output 3.1 and following approval of strategy by development actors.	18 months	190.000
	Sub-Total	**240.000**
Project Administration and Implementation Costs		
National Programme Manager - SB5 (Salary: EUR 36.216/year + Health & Life Insurance: EUR 425 /year)	18 months	54.962
National Expert (Civil Society) - SB4 (Salary: EUR 35.196/year + Health & Life Insurance: EUR 425/year)	18 months	53.432
National Expert (Anti-Corruption) - SB4 (Salary: EUR 35.196/year + Health & Life Insurance: EUR 425/year)	18 months	53.432
National Financial/Procurement Officer - SB3 (Salary: EUR 24.360/year + Health & Life Insurance: EUR 425/year)	18 months	37.178
Office Space, Travel and Transportation, IT and Communication, Furniture, Security Services (EUR 10.632/staff/year)	18 months	63.792
External evaluation (consultancy)	n/a	10.000
External audit	18 months	20.000
	Sub-Total	**292.796**
	General Management Service (7%)	**158.045,72**
	Total Budget	**2.415.842**

10. MONITORING & EVALUATION

Effective monitoring and evaluation (M&E) is critical to determine whether interventions are yielding the expected results. The demand for increased development effectiveness has been based on a realisation that producing high-quality deliverables is not enough. Attention must be centred on realistic and positive change, and aim for results where they are most needed.

The main objectives of M&E are to: 1) support substantive accountability to governments, beneficiaries, donors, other partners and stakeholders; 2) ensure informed decision-making; 3) prompt corrective action; 4) promote risk management; and e) enhance organisational and individual learning. In addition, it helps to extract relevant information from past and ongoing activities that can be used as the basis for programmatic fine-tuning, reorientation and future

planning, aligning programmatic interventions with national targets and priorities.[21]All M & E will be based on data disaggregated by sex, age and location to enhance qualitative analysis of the programme's impacts.
Programme implementation will be monitored through the following:

- Monitoring progress toward achieving the three programme outcomes will be ensured by the Programme Manager through data collection on an ongoing basis with the aim of measuring progress against specific indicators.
- M&E at the activity level will be performed by the Programme Team on the basis of the annual work plans prepared for each outcome. Individual team members will submit internal quarterly reports, enabling the UNDP Team Leader/Senior Governance Adviser and the EUPOL COPPS Programme Director to assess progress on a regular basis.
- The Programme Board will hold biannual meetings to discuss programme progress towards achieving results. To facilitate oversight, the Programme Manager will submit biannual progress reports which present the results of M&E processes.
- An M&E Plan will be set up in Atlas and arrangements will be made so that the programme is externally audited according to the agreed-upon budget lines in chapter eight of this Programme Document. The M&E Plan will include an issue log, risk log and lessons-learned log that will be updated by the Programme Manager to facilitate tracking and resolution of potential problems or requests for change.

11. RISK ANALYSIS

Given the unique political, security and development context of the oPt, the UNDP/EUPOL COPPS Joint Programme inevitably involves a number of risks that may jeopardise the projected outputs and outcomes of the programme. However, this is not uncommon in the oPt, but rather an overall risk faced by all international development and humanitarian actors.

The challenges are both internal and external, and yet interrelated. The establishment of a police force during an ongoing military occupation - and in the absence of a peace-agreement - places severe constraint on such police force to execute its mandate both operationally and from a normative view point. The lack of freedom of movement hampers investigation and evidence-gathering, which in turn risks undermining due process. The overall climate of a militarized environment and violations directly or indirectly related to the occupation poses a challenge to promote respect for human rights and a change in attitude.

Conversely, and unrelated from the external occupation, the advancement of the rule of law always poses major challenge in any crisis/post-crisis setting where new institutions are established in a state-building process. Generally, changing attitudes and mindsets is a lengthy process and it is hoped that the wider political context in which the programme operates remains conducive to bringing about these changes.

At the internal level, strengthening accountability and oversight therefore requires sustained buy-in and support, with attention to the potential setbacks that may pose a risk to delivering on all agreed-upon objectives. As the programme aims to bring about societal change in an environment of external pressure, such as a military occupation, without progress at the political level, there is a risk that the present level of national ownership might subside over time.

With regard to the PCP, the main risks include a weak legal framework, no clear division of labour between the three internal oversight bodies, and a general lack of internal coherence and cooperation. While UNDP and EUPOL COPPS enjoy excellent relations with the PCP and this programme is committed to addressing these gaps, limited access to case information poses a challenge.

Moreover, as in all crisis/post-crisis situations, there is a risk pertaining to the possibility of political interference and even intimidation and harassment of complainants and witnesses. There is also a risk that Palestinian civil society

[21] The framework for planning, monitoring and evaluation within UNDP is provided in the UNDP Programme and Operations Policies and Procedures (POPP), the UNDP Handbook on Planning, Monitoring and Evaluation, and the UNEG Standards for Evaluation in the UN System. These tools aims to provide guidance to UNDP management and staff on key functions and mechanisms through which the results and principles enshrined in the programmatic documents of UNDP, including the strategic plan, are to be achieved. They reflect the intentions of the Executive Board and also inform outside stakeholders about how UNDP conducts its work.

organizations may refuse to engage in what is regarded as an extremely sensitive and difficult area. These are chief challenges that the programme intends to address.

Finally, it is important to bear in mind that the nascent partnership between UNDP and EUPOL COPPS also poses a number of challenges. In addition to the need to align distinctly different corporate cultures, high staff turnover has been identified as an imminent risk to proper programme implementation. However, the emerging partnership between UNDP and EUPOL COPPS has been established on a solid basis for cooperation and carries a great potential for setting a precedent in the oPt and globally.

For a detailed description of the threat factors and the mitigation measures, please refer to the matrix below.

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
Output Level							
Lack of national ownership and buy-in	All, due to uneven or stalled uptake of activities	Maintain strong partnerships with national counterparts. Identify and support change agents.	UNDP and EUPOL COPPS are no longer regarded as trusted partners	High	High	High	Solidify partnerships at local level with institutions, civil society and communities, while also strengthen high-level leverage system of oversight and reinforcement. Expand trust- and confidence-building measures and increase ongoing engagement, coupled with clearly defined and communicated incentives. Work with established national mechanisms, such the Programme Steering Committee (PCP) to sustain ownership as a preventive action. Empower change agents to influence sense of ownership through leverage and incentives.

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
Limited access to Information, including citizen complaints	All, particularly activities related to institution-building. It will be difficult for programme staff to engage if they unaware of the work of their counterparts	Maintain strong partnerships with national counterparts Ensure high-level intervention	Unforeseen legal limitations to information-sharing	High	High	High	Identify and establish modalities for structured and institutional information sharing, combined with strengthened partnerships to encourage flow of information. Strengthen trust- and confidence building measures to advance shared vision and reward-system for cooperation. Establish and maintain internal accountability system for reward and recognition to advance transparency and cooperation.
Lack of internal coherence and cooperation	All, particularly activities in support of the PCP. If one of the internal oversight bodies refuses to engage, the whole programme may be affected	Develop and implement accountability strategy Develop clear and complementary organisational mandates	Individual relationships supersede organisational mandates	Medium	Medium	Medium	Identify and establish modalities and organizational streamlining for structured and institutional cooperation and efficiency. Nurture team-building and results-driven approaches, while training actors to effectively coordinate and apply team-approach across the three internal oversight bodies.

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
							Strengthen trust- and confidence building measures to advance shared vision and reward-system for cooperation. Establish and maintain internal accountability system for reward and recognition to advance transparency and cooperation. Empower change agents, especially at leadership level, equipping these with skills and incentives to lead coordination.
Weak Legal Framework	All, particularly activities in support of the PCP. In the absence of a proper legal framework, it may impossible to develop a comprehensive accountability strategy	Advocate for legal reform Build cross-institutional relationships Indentify gaps and areas of concern	Legal reform inadequate and/or unenforceable	Medium	Medium	Medium	Benefit from the existing Rule of Law Programme in support of Ministry of Justice (legislative review and drafting). Maintain dialogue and capacity building support with policy-and law-makers.. Review draft Police Law, support reform and monitor implementation.

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
Limited interest and engagement of CSOs	Activities under Intervention 3. In turn, the programme will be unable to develop external oversight mechanisms	Maintain strong partnerships with CSOs Ensure inclusive consultation and trust-building	Insufficient number of suitable CSO partners	Low	Medium	Low	Deepen existing engagement and partnership-building with CSOs conducted by UN, EUPOLCOPPS and development partners. Ensure and reinforce the inclusion of different CSOs with a strong focus on justice, security, rule of law and governance. Invest in dialogue, communications and advocacy to reach out effectively to CSO's and establish trust.
UNDP/EUPOL COPPS relationship	All. Without proper coordination and cooperation between UNDP and EUPOL COPPS, the programme goals may not be achievable	Develop MOU and ensure strong management support. Regular and timely communication and problem-solving.	Unforeseen change of EUPOL COPPS mandate	Low	High	Low	Establish and respect the modalities of cooperation embodies in the Programme Board for the Joint Programme. Systematic approach to coordination and communication through daily communications, regular team meetings and joint briefings for national partners and

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
							development partners. Shared M&E and reporting strategies to ensure a shared sense of responsibility for the success of the programme.
High staff turnover	All. High staff turnover may jeopardise well-established relationships and negatively affect institutional memory	Ensure proper planning Develop adequate handover procedures Support and empower national staff Ensure access to Expert Rosters	Unforeseen change of EUPOL COPPS mandate Loss of institutional memory	Medium	High	Medium	Improve human resources policies that retain staff. Ensure staff well-being, team-spirit and shared commitment. Put in place information management mechanism, such as reports, minutes, filing systems, debriefings. Benefit from existing rosters to identify external expertsfor rapid deployment.
Outcome Level							

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
Political Sensitivities	All, particularly activities in support of the PCP, PACC and CCC. Perceived political sensitivities may severely hinder programme implementation	Maintain strong partnerships with national counterparts Ensure high-level intervention Ensure implementation at an appropriate pace	Difficulty in persuading partners to tackle sensitive issues	High	High	High	De-sensitize political sensitivities through stronger focus on development dimension related to rule of law and democratic governance. Raise awareness and build consensus around sensitive issues through ongoing engagement and within existing activities (as part of attitudinal change). Empower change agents to transcend misconceptions and focus on impartial democracy – as opposed to perceived partisan politics. Empower high-level partners and superiors (e.g. Chief of Police) to steer perceptions towards professionalism, rather than politics.

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
Institutional interventions do not translate into societal change	All. Even if the programme delivers on the agreed-upon objectives, there is some risk that its impact will be limited	Conduct public awareness campaigns Ensure broad political and social buy-in Ensure visibility of the programme, as appropriate	Attitudinal change are not keeping pace with programmatic interventions	Low	Medium	Low	Strengthen communications and advocacy to attract and transform specific target groups at all levels that can influence societal change. Facilitate dialogue between the PNA and civil society, including the media. Develop and execute comprehensive media relations strategy.
Lack of trust in public institutions	All. If confidence levels remain low, the general public might not come forward and make complaints	Conduct public awareness campaigns Recognise positive performance Support CSOs to foster confidence.	Inability to significantly enhance performance	Medium	Medium	Medium	Utilize leverage and inroads represented by UNDP Rule of Law/Access to Justice Programme (witness protection), community-based programmes and ongoing work with civil society to expand outreach and benefits of all ready established trust. Ensure human security/public services by setting precedents and raise awareness of these cases: each successful case will encourage confidence to come forward.

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
							Establish strong media/communications capacity to support community/PCP dialogue Ensure public access and easily available information on results and impact, including factual and solid M & E. Ensure outreach and easily accessible information to vulnerable or exposed groups.
Intimidation and harassment	All, particularly activities in support of the PCP, PACC and CCC	Ensure high-level intervention Build confidence to protect investigators, complainants and witnesses Maintain impartiality	Lack of close protection and witness protection programmes	Low	Low	Low	Closely monitor ongoing investigations and identify high-risk situations for immediate action of protection/intervention/redress . Nurture and empower high-level partners to ensure oversight, compliance and accountability.

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
Israeli occupation	All, in particular activities related to investigation and evidence-gathering. In addition, the militarized environment poses a challenge to promote respect for human rights and attitudinal change.	Actively monitor the security situation, design flexible interventions and back-up plans. Maintain ongoing dialogue with COGAT and ensure close support from UNSCO and the UN political leadership. Ensure ongoing and close consultations with donors/development partners for strategic flexibility and readjustment in programming. Ensure dialogue with the PNA (PCP, PACC/CCC) and civil society.	Continued/increased aggression by the State of Israel Arbitrary arrests and detentions of programme stakeholders	High	Medium	High	Ensure daily/weekly political/security information and analysis to flexibly and rapidly adapt planning and implementation to changing environment. Produce rolling contingency planning based on the above, and constantly ensure a two-option approach (alternative dates, venues). Increase communication with COGAT, UNSCO Political Affairs, RC Coordination Unit, OHCHR monitoring units. Implement a crisis-sensitive training module on human rights combined with practical experience and lessons learned from crisis-settings. Optimize the leverage of UNSCO, development partners, missions/consulates to channel and influence the operational environment.

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
Political interference	All, particularly activities in support of the PACC and CCC. Political interference has the potential to severely undermine the performance and legitimacy of the programme's partner institutions	Ensure broad political and social buy-in. Ensure high-level intervention by senior UN/EU/PNA officials. Maintain impartiality manage diplomatic persuasion at all levels.	Inability to control the level of political interference	Medium	Medium	Medium	Strengthen relationships and access to PNA institutions and capitalizing on existing PNA- supported programmes on Local Governance, Rule of Law, Public Administration to monitor and rapidly use such leverage to address interference. Strengthen and benefit from high-level relationshipsin the PM and President's Office to protect programme. Work closely with civil society to closely monitor ongoing investigations and identify high-risk situations.
Reconciliation	All. Reconciliation may lead to increased political unrest and the (temporary) suspension of programme activities	Keep track of political developments Maintain impartiality and ensure a focus on universal standards. Build cross-institutional relationships	Donors/development partners withdraw support to the programme	Low	Medium	Low	Deepen relationships with PNA and civil society to serve as a catalyst that sustains respect of democracy and human rights in the programme. Plan for alternative activities to adjust to changing dynamics - not to compromise

Threat Factors	Programme Activities Affected by Threat Factor	Programme Vulnerability		Security Risk Analysis			Recommended Mitigation Measures
		Existing Mitigation	Remaining Vulnerabilities	Threat Likelihood	Threat Impact	Risk Level	
							the human rights objective. Ensure adherence to core-development principles of inclusion, participation and empowerment.
Political divisions	All. Internal divisions create obstacles to working with all parties	Maintain impartiality Maintain strong partnerships with national counterparts	Inability to mitigate the impact of political infighting	Low	Medium	Low	Maintain strong partnerships at local and central level and across divides to secure impartiality and trust to mediate and bridge gaps as they arise. Plan for alternative activities to maintain flexibility and ability to continuously implement impartial and non-partisan activities.
Financial							
The programme will strictly adhere to**UNDP Financial Regulations and Rules**. In addition to the requirement that each programme shall be audited at least once in its lifetime, the Programme Manager - as the budget holder - is responsible for all financial transactions. Since UNDP is the executing agency for this programme, all implementing partners are legally obligated to follow UNDP procedures, rules and regulations.							
Environmental							
It is recognized that an environmental risk assessment is irrelevant for the implementation of this programme.							

12. LEGAL CONTEXT

This Programme Document shall be the instrument envisaged in the Supplemental Provisions to the Project Document, attached hereto. Consistent with the above Supplemental Provisions, the responsibility for the safety and security of the executing agency and its personnel and property, and of UNDP's property in the executing agency's custody, rests with the executing agency.

The executing agency shall:

- Put in place an appropriate security plan and maintain the security plan, taking into account the security situation in the country where the project is being carried out; and
- Assume all risks and liabilities related to the executing agency's security, and the full implementation of the security plan.

UNDP reserves the right to verify whether such a plan is in place, and to suggest modifications to the plan when necessary. Failure to maintain and implement an appropriate security plan as required hereunder shall be deemed a breach of this agreement.

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