

Palestinian Draft Law on Access to Information

Bringing access to information legislation in line with international civil-democratic standards

Ramallah, April 2013

سأن الحسب عنها مع وقوع جريمه تمثل جنابه، او بوفرت للمحكمة معطيات تشير الى أن الصحفي حصل على هذه المعلومات بطريقة مخالفة للقانون، ويجوز لمصدر المعلومات في هذه الحالة ان يشترط على المحكمة ابقاء اسمه سريا.

٣. لا يتحمل أي شخص حصل على معلومات صنفت بموجب القانون بأنها سرية أية مسؤولية قانونية ما دام وصوله الى هذه المعلومات لم يكن بحكم وظيفته، ولم يقد بأعمال مخالفة للقانون في الحصول عليها، وقام بنشرها بهدف اطلاق الجمهور عليها.

الفصل الثالث

طلب الحصول على المعلومات

المادة (١١): تقديم الطلب

يقدم طلب الحصول على المعلومات بشكل مكتوب الى المؤسسة العامة التي تستحوذ على المعلومة، ويجوز للمؤسسات العامة قبول تقديم الطلبات بشكل خطي من خلال وسائل الاتصال الالكترونية، ويجب أن يحتوي هذا الطلب على تفاصيل كافية تمكن الموظف المختص من استخراج المعلومة بجهد بسيط.

الفصل الثاني

مبادئ الحق في الإطلاع

المادة (٧): وجوب النشر

يتوجب على المؤسسات العامة سنوية تتضمن على الأقل:

١. خطط إدارية حول آلية عمل المؤسسة العامة تتضمن أهداف، والحسابات المالية، والموازنات، وأداءات العمل والعلاقة مع جهات المستخدمين، إنجازات، والمعوقات.

٢. آليات التي يستطيع الأفراد على أساسها التعرف على المؤسسة العامة والمشاريع الخاصة بالمؤسسة العامة.

٣. النسخ التي تحتفظ بها المؤسسة العامة بها، والحالات التي تحفظ بها.

٤. مضمون أي قرار أو سياسة قد يؤثران في الشعب، وأسباب إتخاذ القرار و الأهداف المرجوة منه.

٥. تقارير الهيئات والمؤسسات الرقابية الرسمية بحق المؤسسة العامة.



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The Geneva Centre for the Democratic Control of Armed Forces (DCAF) promotes good governance and reform of the security sector. The Centre conducts research on good practices, encourages the development of appropriate norms at the national and international levels, makes policy recommendations and provides in-country advice and assistance programmes. DCAF's partners include governments, parliaments, civil society, international organisations and the core security and justice providers such as police, judiciary, intelligence agencies, border security services and the military.

About MADA

The Palestinian Center for Development and Media Freedoms (MADA) was established in 2006 to support journalists in the Palestinian territories who continue to face numerous oppressive constraints in their struggle for freedom of expression. The vision of MADA is to end the violations against journalists, support them in their work, reduce practices of self-censorship out of fear of reprisal, and facilitate Palestinian media in reclaiming its role as the fourth authority.

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Background

During the months of November and December 2012, a committee of four Palestinian legal experts revised and amended the existing Palestinian *Draft Law on the Right to Access Information* (2005). The committee was established by the Palestinian Center for Development and Media Freedoms (MADA). It benefited from the financial and conceptual support provided by the Geneva Centre for the Democratic Control of Armed Forces (DCAF).

The four legal experts from the West Bank and the Gaza Strip were selected on the basis of their knowledge of national and international law, access to information legislation and standards of media freedom. The work of the committee included the following steps:

- Identifying gaps in the existing Palestinian Draft Law on the Right to Access Information (2005);¹
- Re-drafting the law in light of international best practice and recommendations formulated by Palestinian stakeholders;
- Submitting a new Palestinian Draft Law on the Right to Access Information to Palestinian decision-makers; and
- Promoting its enactment into law.

The work of the committee followed recommendations formulated in the MADA-DCAF Working Paper *“Palestinian Media and Security: Promoting Palestinian Journalists’ Access to Information through Legislation”* (2012). More than 250 Palestinian stakeholders participated in formulating these recommendations as part of a MADA-DCAF project between November 2011 and April 2012 in the West Bank and the Gaza Strip. During this project, MADA and DCAF distributed an assessment questionnaire (see annex) to a total of 146 representatives of the Palestinian media, civil society, executive, legislative and judiciary authorities. The main findings of the assessment process were presented in a national conference on access to information, which MADA and DCAF

held in Ramallah on 9 October 2012.²

The committee of legal experts studied the participants’ recommendations for amending the Palestinian *Draft Law on the Right to Access Information*. They submitted their new *Draft Law on the Right to Access Information* during a workshop held by MADA and DCAF on 17 December 2012 in Ramallah. A DCAF international expert reviewed the work of the committee and made recommendations for further improvement.

In December 2012, MADA launched a public campaign in support of the enactment of the new *Draft Law on the Right to Access Information*. The campaign was supported by additional donors such as the OSF, the FFF and IFEX.

Why publish a new Palestinian Draft Law on the Right to Access Information?

The present publication includes the new Palestinian *Draft Law on the Right to Access Information* prepared by the legal committee supported by MADA and DCAF. Publishing this new *Draft Law* has three objectives:

1. To provide an informed input to decision-makers of the Palestinian National Authority (PNA) and the Palestinian Legislative Council (PLC) in charge of enacting a Palestinian *Draft Law on the Right to Access Information*
2. To provide Palestinian stakeholders and members of the donor community alike with a solid basis on which to build further support for projects aimed at enhancing transparency and accountability of

¹ The text of the 2005 Palestinian *Law on the Right to Access Information* is available in: *Access to Information and Security Sector Governance. Reference Text Reader*, Geneva/Ramallah: DCAF, 2010, pp. 25-31, available: <http://www.dcaf.ch/Publications/Access-to-Information-and-Security-Sector-Governance-Reference-Text-Reader>

² This process was summarised in a documentary film, which was broadcast on Palestinian national TV. The documentary is available: http://www.youtube.com/watch?v=sDXEiB_OkPs&feature=youtu.be.

Palestinian public bodies, including security sector institutions

3. To help civil society and media representatives devise appropriate awareness campaigns for promoting the enactment of Palestinian access to information legislation

What are the key principles of access to information legislation?

The committee of legal experts who revised and amended the Palestinian *Draft Law on the Right to Access Information* paid particular attention to respecting the following key principles and standards of access to information legislation. The following section describes what these principles and standards are and where they can be found in the new Palestinian *Draft Law on the Right to Access Information*.

With regards to the scope and definitions, access to information legislation should include:

- Clear definitions of the institutions covered by the law, e.g. “public bodies” (including security, defence and law enforcement agencies), “information”, “information commissioner”, “minister”, etc. - Art. 1
- A clear statement regarding the purpose of the Law - Art. 2
- A clear statement in favour of the principle of maximum disclosure, which should limit restrictions to documents only to those which are strictly necessary - Art. 3
- The prevalence of access to information laws over other laws - Art. 44

With regards to exceptions, access to information legislation should include a very limited scope of exceptions related to:

- National security, law enforcement and judiciary investigations - Art. 19, 22
- Economic and monetary interests - Art. 23, 24
- Foreign policy and international relations - Art. 20
- Privacy - Art. 26

With regards to the procedures for accessing information, access to information legislation should include:

- Guidelines for submitting written or oral applications - Art. 11, 12
- Reasonable timeframes for submitting requests and deadlines for the administration to respond to these requests - Art. 13
- Free access to information as a matter of principle, except where requests require a specific amount of research - Art. 40
- The administration’s obligation to motivate a denial of access to information should be based on specific legal grounds - Art. 18

With regards to the Commissioner General of information, access to information legislation should support:

- The Commissioner’s full independence from the executive and budgetary autonomy - Art. 27
- The Commissioner’s appointment by parliament or following a proposal submitted by government and ratified by parliament - Art. 33
- The Commissioner’s capacity to adjudicate conflicts and investigative powers - Art. 38

With regards to the authorities’ duty to promote open government, access to information legislation should include:

- Guidance for public bodies to:
 - Maintain and archive documents - Art. 5
 - Proactively publish documents, activity reports, news, etc - Art. 7, 8
 - Organise public meetings and press conferences - Art. 9
 - Train officials in charge of providing information to the public - Art. 6

With regards to the protection of whistleblowers, access to information legislation should include:

- Protective measures for witnesses of wrongdoings and cases of corruption - Art. 10

Recommendations

MADA and DCAF believe that the new Palestinian *Draft Law on the Right to Access Information* is in line with international civil-democratic standards. Based on this input, MADA and DCAF recommend that the Palestinian authorities:

1. Initiate a review process aimed at approving a final version of the *Draft Law*
2. Engage in a public consultation process on the need to enact this *Draft Law* into law
3. Enact the *Draft Law on the Right to Access Information* into law
4. Ensure that, over time, the new system promoted by the Law fully responds to expectations of the Palestinian society in terms of transparency and accountability of public bodies, including security sector institutions.

MADA and DCAF reiterate their offer of assistance to the Palestinian authorities and all interested parties in developing Palestinian media legislation which respects civil-democratic standards.

Palestinian Draft Law on the Right of Access to Information (2012)

Chapter One

General Provisions

Article 1: Definitions

For the purposes of the implementation of the provisions of this Law, the following definitions apply to the key terms and designations listed below:

Authority: Palestinian National Authority (PNA).

Commissioner General: Commissioner General of Information.

Office: Office of the Commissioner General of information.

Public Institution: All ministries, departments, executive and regulatory bodies; legislative, judicial and executive institutions; local bodies, civil society organizations (charities, unions and federations) and any party that receives State funding; private institutions that manage public facilities, perform public works, or that possess information on the environment or public health and safety matters; and any other institution considered by the Commissioner General to be of a public nature for the purposes of the implementation of this Law.

Competent

Employee:

Employee designated by a public institution to process requests for information in its possession.

Public Figure:

A person who has a leading position in the State such as a member of the Legislative Council, the Council of Ministers, the Supreme Judicial Council, the Office of the Presidency, or of security sector institutions; or a person who holds a senior position in a political party, union or federation known in the community; or any other person considered by the judicial authorities to be a public figure for the purposes of this Law.

Information:

Written or electronically-stored records and documents, drawings, maps, tables, pictures, films, microfilms, sound recordings, videos tapes, graphs, or any information accessible via special devices; and any information considered by the Commissioner General to fall within the scope of this Law.

Alternative

format:

A format that enables persons to obtain the information they require in a format that responds to their specific needs.

Article 2: Law Purposes

This law shall aim to:

1. Enable persons to exercise their right of access to information held by public institutions, in accordance with the provisions of this Law.
2. Foster a culture of transparency and accountability within Palestinian public institutions in a spirit of openness vis-à-vis the general public.

Article 3: Information Disclosure

All information held by public institutions shall be accessible unless stipulated otherwise by this Law on security or other grounds.

Article 4: Competent Employee

Each public institution shall appoint a person tasked with the responsibility of processing requests for information. These persons shall be empowered with the authority to access and retrieve the required information.

Article 5: Information Management and Storage

Public institutions shall manage and store information in their possession in an orderly manner to facilitate information retrieval, and shall store information electronically whenever possible.

Article 6: Employee Training

Public institutions shall organize training courses for their employees on the importance of the right to access information, on how to facilitate the exercise of this right, and on information storage and retrieval mechanisms.

Chapter Two

Principles of the Right of Access to Information

Article 7: The obligation to publish key information

Each public institution shall publish an annual report that, at a minimum, will include:

1. Information on: administrative and working procedures and regulations;

objectives and achievements; problems encountered; budget and audited accounts; and the services the institution provides to the general public.

2. The procedural steps to be taken by individuals who wish to learn about the public policy and projects of the institution.
3. The type of information held by the institution and details of how it is managed and stored.
4. Information on any decision or policy adopted by the institution that may affect the general public, including the rationale behind them, and their intended impact.
5. Official regulatory body reports about the institution.
6. Any other information that the Commissioner General considers should be published.

Article 8: Industrial Institutions' disclosure obligations

Industrial institutions, both public and private, shall publish semi-annual reports that must, at a minimum, include:

1. The location(s) and nature of any toxic substances utilized, and information on the potential risks posed by them.
2. Manufacturing waste discharge levels.
3. Means of waste disposal.

Article 9: Public Institution Public Meetings

A public institution must announce the date, place and purpose of each of its public meetings; the public may not be prohibited from attending these meetings, except in cases stipulated under this Law.

Article 10: Protection of Informant

1. An employee who, in good faith, discloses information about irregularities or breaches of the law shall be protected and may not be penalized in any way for making the disclosure.
2. Journalists' information sources may not

be disclosed unless the sources wish to be identified, or in cases where a court orders source disclosure to prevent a crime or because the information was obtained in an illegal manner.

3. A person who obtains information legally classified as confidential is not liable to prosecution on condition that the information is not obtained by that person acting in an ex officio capacity or in another illegal manner, and that the public is granted access to the information in question.

Chapter Three

Information Requests

Article 11: Submission of Request

Requests to access information shall be submitted in writing to the public institution that possesses the required information. Such requests may be submitted via electronic mail, provided they contain sufficient detail to enable the competent employee to retrieve the information with minimum effort.

Article 12: Notification of Receipt of Request

Upon receiving the request, the competent employee shall immediately notify the requesting party of the date of receipt of the request, the type of information requested, and the time required to respond to the request.

Article 13: Response to Request

The competent employee shall respond to each request within 7 days of receipt, a timeframe that may be prolonged by a maximum 7 days if the request entails the retrieval of a large amount of information, or if access to the information involves consultation with a third party or another public institution. Non-response within a maximum period of 14 days shall be considered a rejection of the request.

Article 14: Request Approval

If the request is approved, the competent employee shall make the information requested available and determine the associated fee chargeable to the requesting party. If the request is for more than

one item of information, the competent employee should allow the requesting party to access all the available items of information required that are not subject to the access restrictions stipulated under this Law on security or other grounds.

Article 15: Submission of Information

Upon approval of the request, the competent employee shall provide the required information to the requesting party in accordance with the established procedures of the public institution. Responses to information requests shall not be exclusively verbal and must include a copy of the document containing the information requested. Instructions issued by the Commissioner General shall indicate how the requesting party can obtain a copy of the required information.

Article 16: Alternative Information Format

When requested and to the extent possible, the competent employee shall provide information in an alternative format that meets the requirements of the requesting party. The competent employee may transform information into an alternative format on condition that the requesting party agrees to cover the associated costs.

Article 17: Referrals of Requests to Another Institution

The competent employee may, with the prior agreement of the requesting party, refer a request to another institution if that institution is considered better placed to respond to the request in terms of the ready availability of the information required and its ability to provide it in alternative formats. In such cases, requests are considered to have been submitted to the public institutions to which they have been referred.

Article 18: Rejection of Request

If the request is rejected, the competent employee shall state the reason(s) for the rejection in a written response to the requesting party. The reasons for the rejection of a request may not extend beyond the following considerations:

1. The institution does not possess the requested information.
2. The requested information is subject to the access restrictions imposed under this Law on security or other grounds; the

competent employee shall explain the nature of the restrictions and how they affect access to the information requested.

Chapter Four

Exceptions

Article 19: National Security and Public Order

The competent employee shall refuse to release any information whose disclosure risks endangering the defence capabilities and national security of the State. This includes information on:

1. Weapons, tactics, strategies and military forces, as well as military operations which aim to protect the homeland.
2. Intelligence information utilized, in accordance with the applicable laws, to thwart any act of aggression or crime that endangers the internal and/or external security of the State.
3. International communications and correspondence related to defence matters, including military alliances.

Article 20: Information about a Foreign Party

The competent employee shall refuse to disclose any information concerning a foreign State or organization with which an agreement has been concluded to keep this information confidential, provided that the employee can prove the existence of such an agreement.

Article 21: Access to Information Over 20 Years Old

The competent employee shall not refuse to disclose information referred to in Articles (19) and (20) of this Law if it is more than 20 years old and still held by a public institution, except in cases where a decision by the Commissioner General to keep the information confidential for a further fixed time period is justified and adequately explained.

Article 22: Information on Judicial Investigations

Public institutions responsible for the investigation of crimes and oversight of law enforcement and

police action shall refuse to disclose information if it risks jeopardizing a criminal investigation, or compromising the reputation of a person who has not been convicted of any crime or wrongdoing. The public prosecutor may order partial disclosure of criminal investigation proceedings in corruption cases if he/she deems it necessary to inform public opinion.

Article 23: Economic Security Issues

Without prejudice to the applicable laws, the competent employee may refuse to disclose professional or commercial information of a confidential nature pertaining to the public institution if it risks causing material damage to the economic interests of the State, or undermining its ability to manage the national economy.

Article 24: Commercial Secrets

The competent employee shall refuse to disclose any information containing professional secrets to a third party, or disclose information which may undermine the competitiveness of a third party unless that party agrees to such disclosure.

Article 25: Internal Affairs of the Institution

The competent employee may refuse to disclose any information that relates to the internal affairs of the institution and its staff, including internal orders and preliminary discussions and proposals.

Article 26: Privacy

1. The competent employee shall refuse to disclose any information about the private life of a third party or which might endanger the safety of any person, except in the following cases:
 - a. The person concerned agrees to the disclosure.
 - b. The information concerned is available in the public domain.
 - c. Disclosure is required by court order or approved by the Commissioner General.
 - d. The requesting party is a custodian of the third party.
 - e. If the requesting party is a relative of the third party, and provided that the

request is submitted at least 20 years after the death of the latter.

2. Any person intending to publish information about a public figure shall not be prevented from accessing or publishing such information. In the event that the information proves to be incorrect, a financial penalty can be imposed on the person who publishes it, in accordance with the applicable provisions of the Law.

Chapter Five

Commissioner General of Information

Article 27: Office of the Commissioner General of Information

Pursuant to the provisions of this Law, an Office of the Commissioner General of Information shall be established. It shall enjoy the legal personality and independence it requires to exercise its functions. The Office shall be allocated a special budget within the public budget of the Palestinian National Authority.

Article 28: Powers of the Office

The Office shall be considered as an authority of appeal for persons whose access to information requests have been rejected. The Office shall aim to ensure implementation of the provisions of this Law and to achieve the goals set out therein. Accordingly, it shall be entitled to exercise the following powers:

1. Develop, regulate and implement the programmes, plans and policies pertaining to the defence of the right of individuals to access and obtain information.
2. Raise public awareness about the importance of ensuring the right of access to information and the positive results to be gained from the exercise of this right at the level of the individual, society and the State.
3. Contribute to the training of public institution employees and officials on the importance of the right to access information, on how to facilitate the exercise of this right, and on information storage and retrieval mechanisms.
4. Monitor infringements of the right of access to information and publish reports and studies highlighting impediments to the

exercise of this right and ways to eliminate them.

Article 29: Office Headquarters

The Office headquarters shall be located in Jerusalem and branches may be established in all Governorates.

Article 30: The Office Acts as an Appeal Authority

The Office shall be considered an appeal authority for persons who wish to contest:

1. Rejection of a request for information.
2. The fee charged for accessing information.
3. Rejection of a request to obtain information in an alternative format.
4. The prolongation of the time period authorized to respond to an information request beyond the maximum timeframe imposed under Article (13) of this Law.
5. The fact that his/her information request was referred to more than one institution without his/her prior approval, as required by this Law.
6. Other outcomes that the Commissioner General of Information agrees to examine on appeal.

Article 31: Dates of Appeal

An appeal must be submitted to the Office no later than 30 days after the request has been rejected or 30 days after the date of any decision of the institution against which the requesting party wishes to lodge an appeal.

Article 32: Response to the Appeal

The Office shall respond to an appeal no later than one month after its submission. Upon registration of the appeal, the Office shall immediately notify the relevant institution in writing that its rejection of the access to information request concerned has been appealed and request to be informed of the precise reasons for the rejection.

Article 33: Appointment of the Commissioner General of Information

The Commissioner General of Information shall be appointed to preside over the Office by decision

of the Council of Ministers that is subject to the subsequent approval of the Palestinian Legislative Council. The appointee may serve a maximum of two four-year terms. His/her salary and other financial entitlements shall be determined within the framework of the nomination decision-making process.

Article 34: Functions of the Commissioner General

The Commissioner General shall follow up and rule on appeals lodged with the Office, appoint Office staff and regulate their work routine.

Article 35: Full-Time Commissioner General

The Commissioner General must be devoted full-time to the functions of the position and may not simultaneously engage in any other work or hold any other position or function, regardless of whether or not the latter are remunerated.

Article 36: Dismissal of a Commissioner General

The services of the Commissioner General shall be legally terminated in the event that :

1. He/she simultaneously performs another function and/or holds another position.
2. He/she is convicted of a crime or wrongdoing involving corrupt or immoral behaviour.
3. He/she is detained or is declared bankrupt.

Article 37: Binding Recommendations of the Commissioner General

Recommendations issued by the Commissioner General are binding on all public institutions.

Article 38: Mandates of the Commissioner General

The Commissioner General shall be empowered with the authority to:

1. Enter any public institution and inspect its registers and papers and any documents related to information for which access has been requested.

2. Interrogate any employee in private in order to access the required information.
3. Refer to the judiciary persons responsible for concealing, damaging or modifying information with a view to intentionally distort the truth and prevent it from being presented to the judiciary.
4. Question ministers and any other senior State officials in the event that they issue orders to conceal information. If the Commissioner General considers that the reasons given for such orders are unjustified, he/she may immediately refer the matter in writing to the President of the Authority, the Prime Minister or the Chairman of the Legislative Council for appropriate follow-up.

Article 39: Reporting

The Commissioner General shall submit reports every six months to: the Palestinian Legislative Council, the President of the National Authority, and the Prime Minister. The reports shall contain:

1. Cases of unjustified refusal to provide information.
2. Operational problems encountered by the Commissioner General in the discharge of his/her duties.
3. Recommendations considered appropriate by the Commissioner General.

Chapter Six

Fees

Article 40: Access to Information Fees

Fees associated with access to information requests shall be determined by regulations drawn up by the Commissioner General and issued by the Council of Ministers. The fee shall not exceed the actual cost of the copying process or the market price of the requested copies.

Article 41: Appeal Fees

The appeal fee shall not exceed 10 Jordanian dinars or the equivalent amount of the legal currency in circulation.

Chapter Seven

Final Provisions

Article 42: Challenges to Decisions of the Commissioner General

The decisions of the Commissioner General may be challenged before the administrative judiciary, and persons may also request the judiciary to declassify information that is not accessible on security and other grounds as defined under the relevant provisions of this Law.

Article 43: Sanctions against employees who refuse to release information in compliance with this Law

An employee who fails to provide requested information in a manner that is inconsistent with this Law, or who provides incorrect or false information, shall be considered liable to face

disciplinary sanctions, as provided for under this Law.

Article 44: Cancellation

Any clause that is inconsistent with the provisions of this Law will be revoked.

Article 45: Executive Regulations

The Council of Ministers shall issue the regulatory framework for the implementation of this Law within a period not exceeding six months from the date of publication of the Law.

Article 46: Enforcement, Execution and Publication

All competent authorities – each one within its respective sphere of jurisdiction – shall implement the provisions of this Law, which will enter into force one year after its publication.

Annex 1

Questionnaire submitted to the participants of the MADA-DCAF consultative process in 2011-2012

1. Scope and definitions

1.1 Constitutional anchorage

- Does the law refer to an article in the Constitution, which guarantees the right to access information?

1.2 Principle of maximum disclosure

- Does the law include the principle of "maximum disclosure"?

1.3 Definition of 'information' and 'public bodies'

- What do the definitions of 'information' and 'public bodies' encompass?
- What other relevant definitions can be found in the law?

2. Obligation to publish

- Does the law mention the obligation for public institutions to disclose information?
- What types of documents do the public institutions have to publish regularly?
- Does the law mention the obligation for public institutions to hold public meetings?

3. Promotion of open government

3.1 Information officer

- Does the law foresee the appointment of an information officer?

3.2 Maintenance of records

- Does the law specify the obligation for public institutions to maintain records?

3.3 Training of officials

- Does the law specify the obligation for public institutions to train officials

in dealing with access to information requests?

3.4 Information commissioner

- Does the law foresee the establishment of an information commissioner's office?
- What duties does the law specify for the information commissioner?

4. Procedures to grant access

4.1 Application

- Does the law specify the procedures for the requester's application?

4.2 Timeframe

- Does the law specify the timeframe within which public institutions have to provide the information to the requester?

4.3 Fees

- Does the law specify the fees to be paid by the requester?

4.4 Review

- Does the law foresee an independent review of refusals to provide access to information?

5. Limited scope of exceptions

- Does the law entail a list of exceptions to the right of access to information?
- What are these exceptions?
- What do the exceptions related to national security include?

6. Protection for whistleblowers

- Does the law specify measures for the protection of whistleblowers?

The Geneva Centre for the Democratic Control of Armed Forces (DCAF)

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The Palestinian Center for Development and Media Freedoms (MADA)

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