

Amending the Regulatory Framework for Handling Palestinian Citizens' Complaints

Working Paper
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the rule of law

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

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Overview

The aim of this Working Paper is to raise Palestinian decision-makers' awareness on the importance of improving the mechanisms through which the executive authorities handle citizens' complaints.

The present Working Paper provides a summary of the discussions held by a joint task force composed of representatives of the Office of the President, the Council of Ministers and The Geneva Centre for the Democratic Control of Armed Forces (DCAF) for amending the Palestinian Council of Ministers' *Regulation on Complaints No. 6 of 2009* and for formulating recommendations for reform.

In particular, this Working Paper aims to support the work of the Council of Ministers' Legal Committee, which is tasked with reviewing the *Regulation on Complaints No. 6 of 2009*. Representatives of the Council of Ministers' Directorate General of Complaints, staff members of the ministerial complaint units and legal advisors working in Palestinian Governors' Offices will also benefit from the findings and recommendations of this Working Paper.

While DCAF focuses on complaints handling in relation to complaints against the behaviour of police and security forces, enhancing the overall complaints handling system will also benefit other parts of the public administration and thus the wider Palestinian population.

Problem Statement

The Palestinian executive authorities have established an internal system for handling citizens' complaints. This system consists of two main tracks. In one track, under the authority of the President's Office, legal departments at the Governors' Offices handle citizens' complaints in a decentralised manner in the governorates. In the other track, under the umbrella of the Council of Ministers, ministerial complaint units deal with people's grievances against the various Palestinian ministries. Yet, this internal complaint handling system does not allow for a thorough follow-up of citizens' complaints against abuses of power, maladministration or violations of human rights by Palestinian executive authorities and security sector institutions. This shortcoming increases people's lack of trust in Palestinian institutions.¹

The Regulatory Framework for Handling Complaints by Palestinian Executive Authorities²

In 2009, the Council of Ministers issued the *Regulation on Complaints No. 6* (hereafter the

Regulation), which provides for the establishment of a Directorate General of Complaints in the Council of Ministers and outlines the role, mandate and procedures of the complaint units in the various Palestinian ministries. According to the *Regulation*, the Directorate General of Complaints (hereafter the *Directorate*) technically supervises the ministerial complaints units. These units receive complaints against their respective Ministers, and in the case of the Ministry of Interior, against the police and security forces. The system allows for complaints to be submitted by both private citizens and civil society organisations.

The *Regulation* also standardises the work of those legal advisors working under the umbrella of the Office of the President at the Governors' Offices who are responsible for complaint handling. Yet, in their complaint-handling function, the Governors' Offices also apply laws, some of which pre-date the establishment of the Palestinian Authority. These laws include the *Jordanian Law No. 7 of 1954 on the Prevention of Crimes*, the *Jordanian Regulation No. 1 of 1966 on Administrative Formations* and the *Presidential Decree No. 22 of 2003 Concerning the Jurisdiction of Governors*.

¹ In an unpublished survey that DCAF commissioned in 2012, a great majority of interviewed complainants expressed their lack of trust in the complaint handling system put in place by Palestinian executive authorities. In many cases, their complaint had reportedly received no feedback at all from the authorities.

² For a detailed overview of the legal and regulatory framework for complaints-handling by Palestinian ministries and Governors' offices, see: *Ombuds Institutions*

and Security Sector Governance. A Palestinian Legal Collection. Geneva: DCAF, 2010 (<http://www.dcaf.ch/Publications/Ombuds-Institutions-and-Security-Sector-Governance-A-Palestinian-Legal-Collection>)

Response

Since 2012, DCAF, in cooperation with the Office of the President and the Council of Ministers, has assisted the Palestinian executive authorities in the West Bank in reviewing and improving their complaint handling system. Besides supporting the review of the regulatory framework for handling complaints, DCAF also provided training to civil servants working in Palestinian ministries and Governors' Offices on complaint handling procedures and promoted the media's role in externally monitoring the performance of the complaints handling system. This Working Paper focuses on the progress achieved in the review of the regulatory framework.³

The Process of Amending the Regulation on Complaints No. 6 of 2009

In 2012, DCAF, in cooperation with the Office of the President and the Council of Ministers, established a task force in charge of reviewing and amending the *Regulation on Complaints No. 6 of 2009*.

A detailed overview of the meetings of the task force is provided in Annex 2 of this report. The consultations of the task force resulted in the following outputs:

1. A new Draft Regulation amending the *Regulation on Complaints No. 6 of 2009*, and
2. A written proposal to the legal affairs department at the Council of Ministers recommending treating the amendment of the *Regulation* as one of the legislative priorities of the government in 2013.

In November 2012, the Ombudsman of the Republic of Serbia, Mr Saša Janković, reviewed the proposed amendments and submitted a written memorandum with his observations to the task force.

In December 2012, in Jericho, with the participation of Mr Janković, DCAF and the Directorate General of Complaints at the Council of Ministers facilitated a national conference on the Palestinian complaint handling system. During the conference, the Secretary-General of the Council of Ministers and the Legal Advisor to the Palestinian

President announced their support for getting the reviewed *Regulation* adopted. To prepare the new version for official endorsement, the Council of Ministers' Legal Committee reviewed the amended *Regulation* and engaged in a process of further consultations.

Throughout 2013, DCAF facilitated feedback and training sessions with civil servants from the ministerial complaint units who will be affected by the amendment of the *Regulation*. The participants in these sessions made their own recommendations for amending the *Regulation on Complaints No. 6 of 2009* and for the practical implementation of the changes. In October 2013, 10 civil servants visited key national and regional complaint handling institutions in Spain on a study trip supported by AECID and coordinated by DCAF together with the Spanish National Institute for Public Administration (INAP) in Madrid. Following the study trip, the civil servants made additional recommendations for improving the Palestinian regulatory and institutional framework for complaint handling.

During a second national conference on complaints, held in December 2013 in Ramallah, the Head of the Council of Ministers' Legal Committee confirmed that amending the *Regulation* was considered a priority by the Palestinian government, and a new legal task force would be established to review the *Regulation*.

Formulating Recommendations for Legal Reform

The observations, findings and recommendations included in this report are those of the members of the joint task force of DCAF, the Office of the President and the Council of Ministers for amending the *Regulation on Complaints No. 6 of 2009* and of the expert commissioned by DCAF, the Ombudsman of the Republic of Serbia, Mr Saša Janković. They are indistinctly referred to in this document as "the experts." Their recommendations are mainly addressed to the experts of the Council of Ministers' Legal Committee, who will be in charge of amending the *Regulation* and submitting it to Palestinian decision-makers with a view to its enactment.

³ For reasons of limited access and resources, DCAF could not conduct a similar project in the Gaza Strip. This report therefore presents only the results of activities implemented in the West Bank. DCAF hopes to be able to conduct similar activities in the Gaza Strip soon.

General Observations

The experts commend the Directorate General for Complaints at the Council of Ministers for its commitment to bringing the legal and regulatory framework for complaints-handling in line with international standards. Thus, the experts share the Directorate General for Complaints' opinion that amending the *Regulation on Complaints No. 6 of 2009* is necessary for improving the handling of citizens' complaints. The experts noted that the consultative process informing the amendment had been an inclusive process, characterised by openness to referring to international references and practice.

While the process is on good course, the remaining challenge consists of convincing Palestinian decision-makers of the need to reforming the legal and regulatory framework for complaint-handling.

In order to reach full compliance with best international practice, the legal framework of the Palestinian complaints handling will require further development of norms, in particular to strengthen the independence of the system. The experts' specific findings and recommendations included in the next section are meant to provide guidance in this process.

Specific Findings and Recommendations

Finding #1. *The purpose of the Regulation and vision and mission of the Directorate General of Complaints are not specified*

Recommendations:

- To define in clear terms the purpose of the Regulation and link it to international standards of good governance, the rule of law and human rights.
- To define in clear terms the vision and mission of the Directorate General of Complaints, of the ministerial complaint units and of the legal departments at the Governors' offices.

Finding #2. *The division of responsibility between the Directorate General of Complaints and the ministerial units and the legal departments at the Governors' offices is ambiguous*

Recommendations:

- To clarify the necessary division of responsibility between the Directorate and the ministerial complaints units and the Governors' offices by amending Articles 2, 6 and 11 of the Regulation.
- To avoid overlapping mandates and to eliminate any ambiguity with regards to the responsibilities and specific tasks of those three complaints handling mechanisms, for instance by clarifying the following points:
 - The *Directorate* supervises the ministerial complaints units and monitors their work
 - The ministerial units have the duty to transmit their annual statistical reports to the *Directorate*
 - The Office of the President's Governorates' Affairs Department supervises the Governors' offices' complaint handling staff
 - The Governors' offices' complaint handling staff are bound to inform the *Directorate* about complaints that concern the Council of Ministers. This is consistent with the joint MoU signed between the Council of Ministers and the Office of the President.

Finding #3. *The personal and professional profile for the position of Head of the Directorate General of Complaints is not sufficiently detailed*

Recommendations:

- To amend Article 2 of the *Regulation* to introduce a more detailed profile for the position of Head of the Directorate, including the following conditions:
 1. having held a senior civil servant position
 2. enjoying a reputation of making legitimate, credible and authoritative decisions, and
 3. being highly knowledgeable about the complaints handling system.
- To introduce a vetting process for the position of the Head of the Directorate to guarantee his/her integrity. The vetting

process shall mainly ensure that the Head of the *Directorate*:

1. has never been involved, throughout his career, in cases of maladministration, abuse of power or human rights violations
2. is politically neutral and not affiliated to the ruling party
3. is committed to handle classified documents with the necessary care and responsibility and to instruct his/her colleagues to adhere to the same standards and to oversee their work.⁴

Finding #4. *The Directorate General of Complaints has only limited complaint resolving authority*

Recommendations:

According to Article 2 of the existing *Regulation*, the Directorate General of Complaints shall report directly to the Secretary General of the Council of Ministers, who, given his/her current hierarchical status, cannot impose binding decisions on ministers or other senior civil servants in the administration. Therefore, the experts recommend adding a new article to the *Regulation* which:

- Enables the *Directorate* to refer a complaint to the Prime Minister's Office, in case an executive institution fails to solve the complaint.
- Specifies the *Directorate's* role, function and authority in solving complaints.
- Clarifies whether the *Directorate* has an advisory role, or whether it is also vested with mediation and conflict-solving powers.

Finding #5. *The Directorate General of Complaints cannot conduct investigations*

Recommendations:

- To explicitly authorise the *Directorate* to initiate and conduct its own investigations into matters revealed by complaints without any limitation by adding a new Article to the *Regulation*.

⁴ For vetting standards in security sector institutions, please refer to: *Vetting and the Security Sector. Backgrounder*, Geneva: DCAF, 2006, available: <http://www.dcaf.ch/Publications/Vetting-and-the-Security-Sector>

- To introduce the option of establishing an investigation and inspection unit by the *Directorate* by adding a new paragraph to Article 4 and by amending Article 2.
- To specify in Article 4 the scope of the *Directorate's* investigative mandate and whether the Directorate can initiate an investigation *ex-officio*, i.e. upon its own initiative, or only based on a complaint received.
- To introduce the *Directorate's* obligation to submit a written statement to the Prime Minister in case one or several persons within the administration are found impeding the complaint-solving process, obstructing the investigation or barring access to documents.

Finding #6. *The Directorate General of Complaints' cannot conduct hearings and on-site visits*

Recommendation:

- To add an article conferring to the *Directorate* the right to conduct hearings with state officials concerned with the contents of a complaint and to conduct announced and unannounced visits to relevant sites.

Finding #7. *The Directorate General of Complaints does not have the right to access all information related to the complaint under investigation, including classified documents*

Recommendations:

- To confer an explicit right to the investigators of the *Directorate* to be granted access to classified documents by adding a paragraph to Article 13.
- To ensure that the investigators remain bound to handle all information in a confidential way, for example by introducing the obligation of signing a legal disclaimer when taking up their function.

Finding #8. *The Regulation does not explicitly mention the complementary nature of complaint handling mechanisms and the judiciary nor the Directorate's role to call for the enforcement of judicial decisions*

Recommendations:

The experts emphasised that the Directorate General of Complaints should not accept complaints on issues already decided or in the process of being decided by a court. However, the *Directorate's* capacity to intervene in case public officials refuse or fail to implement court decisions should be strengthened. The experts stressed on the complementarities of complaint handling mechanisms with the judiciary. Therefore, the experts recommend:

- To introduce the notion that the complaint-handling system plays a preventive and complementary role to the judiciary system, by amending the introduction of the *Regulation*.
- To add a new article to the *Regulation* enabling the *Directorate* to submit a written recommendation to the Prime Minister in case a court decision is not being implemented by the concerned party.

Finding #9. *The Regulation does not contain binding provisions for the ministerial units and legal departments at the governors' offices to submit regular reports to the Directorate nor for the Directorate to make reports public*

Recommendations:

- To introduce an explicit requirement for ministerial complaint units and legal departments at the Governors' Offices to produce quarterly and yearly statistical and narrative reports and to submit them to the *Directorate* for compilation in a single annual public summary report, by amending Article 5. The Article should specify format, contents and period to be covered in the reports.
- To add to Article 5 the obligation to publish these reports or their summary, in order to ensure the transparency and accountability of the complaint handling process.

Recommendations for Further Steps

The experts recommend that the Palestinian Council of Ministers amends and eventually enacts a new *Regulation* for complaint handling

by the Palestinian executive authorities. They commend the Council of Ministers' Legal Committee for considering this matter as part of the top regulatory reforms to be conducted in 2014. Based on the review of the *Regulation on Complaints No. 6 of 2009*, DCAF and the task force members recommend the following:

To the members of the Council of Ministers' Legal Committee in charge of amending the Regulation:

- To establish a task force of legal experts in charge of amending the *Regulation*.
- To mandate the task force to amend the *Regulation* in light of the recommendations highlighted in this Working Paper.
- To secure political support from the Office of the President, the Council of Ministers, the PLC, and relevant ministries to promote the enactment of a new *Regulation*.

To Palestinian Authorities and PLC decision-makers:

- To review the work of the task force of legal experts in charge of re-drafting the *Regulation*.
- To ensure that endorsing and implementing a new *Regulation* becomes part of the government's top priorities in order to strengthen transparency and accountability of the Palestinian public bodies, including security sector institutions.

To Palestinian civil society and media organisations:

- To raise Palestinian citizens and journalists' awareness of the need for a new *Regulation* on complaints.
- To ensure the continuity of public information programmes such as *Ashkilamen*⁵ in order to highlight the challenges of implementing the *Regulation*.

DCAF reiterates the offer of assistance to the Palestinian authorities and all interested parties in continuing the development of a regulatory framework for complaints-handling which respects civil-democratic standards.

⁵ Since 2012, DCAF has supported Wattan TV's *Ashkilamen* programme, the first online television media coverage on complaints. For more details, see: <http://www.wattan.tv/ar/wattan-tv/81052.html?q=online>

Annex 1:

Palestinian National Authority Council of Ministers: The Regulation on Complaints No. 6 of 2009

The Council of Ministers,

In reference to the Amended Basic Law of 2003 and its Amendments, particularly the provisions of Article 68 thereof,

Having reviewed the Decision of the Council of Ministers No. 13/10/2003/PM.CoM/AQ of 2003,

The Decision of the Council of Ministers No. 05/03/09/CoM/AQ of 2005, and

The Regulation on the Department of Complaints at the Council of Ministers and Units of Complaints at Ministries, promulgated on May 3rd, 2005;

Based upon the recommendation of the Higher National Group of the Legislative Plan;

Based upon what the Council of Minister approved in its session, which convened in the city of Ramallah on March 8th, 2009,

Hereby promulgates the following Regulation:

Chapter I: Definitions

Article 1: Definitions

Upon the enforcement of the provisions of this Regulation, the following words and expressions shall have the meanings designated thereto hereunder unless the context determines otherwise:

The Council: The Council of Ministers.

The Premier: The Prime Minister.

The Prime Ministry: The Palestinian Prime Ministry, which consists of the Cabinet Secretariat of the Council of Ministers and Office of the Prime Minister.

The Secretary General: The Secretary General of the Council of Ministers/Chairman of the Office of the Prime Minister.

Directorate General of Complaints: The Directorate General of Complaints at the Prime Ministry.

Units and offices: The Complaints Units and Offices at government institutions and Governorates.

Head of the government institution: The competent Minister in his ministry or the head of the non-ministerial institution in accordance with the Law.

Government institutions: The ministries, institutions, bodies and authorities that report to the Council of Ministers.

Chapter II: The Directorate General of Complaints

Article 2: Composition

A specialised directorate general shall be composed in the Council. Its structure shall be approved within the general structure of the Prime Ministry. It shall report directly to the Secretary General and shall be named the Directorate General of Complaints. It shall consist of three departments. An employee shall assume its administration in accordance with the following criteria:

1. An employee in line with the functional hierarchy from the higher category.
2. To hold the bachelor degree in humanitarian sciences.
3. To have experience for a period of not less than seven years in the field of administrative or legal work.
4. To have adequate experience in dealing with the public as well as public service ethics.
5. Not to have been convicted with a crime or misdemeanour of moral turpitude unless he is re-incapacitated.
6. To be of good conduct and repute.

Article 3: Technical Support and Supervision

The Directorate General of Complaints shall solely carry out all processes of technical support

and supervision; monitoring, coordination and support of units at ministries and offices at governorates; and coordination with the Complaints Department of the Office of the President of the Palestinian National Authority.

Article 4: Departments of the Directorate General of Complaints

The Directorate General of Complaints shall consist of three departments as follows:

1. The Department of Follow-up with Units and Offices.
2. The Department of Coordination with the Complaints Unit at the President's Office, at the Legislative Council and with Nongovernmental Institutions.
3. The Department of Documentation, Archive and Reception.

Article 5: The Quarterly Report

The Directorate General of Complaints shall develop a regular quarterly report on the complaints submitted thereto or to the units and offices and submit to the Secretary General for presentation to the Council.

Article 6: The Complaints Examined by the Directorate General of Complaints

The Directorate General shall examine the following complaints:

1. Those filed against the government institutions.
2. Those relating to the abstention from executing final judicial rulings entered against government institutions.
3. The complaints lodged by civil society organisations in relation to the performance of the government and the institutions reporting thereto.
4. The complaints on which a decision has been made or which have been rejected by a unit or office in the event new substantial data appear and change the course of the complaint.

Article 7: The Complaints Not Examined by the Directorate General of Complaints

The Directorate General shall not examine the following complaints:

1. The complaints heard by the Judiciary.
2. The complaints pertaining to conflicts between persons, whether they were natural or juridical.
3. The complaints, on the subject matter of which a definitive judicial ruling had been entered.
4. The complaints submitted by citizens in relation to making use of humanitarian aid and internal or external grants.
5. The complaints, on [the filing of] which more than a whole year has elapsed.

Chapter III: Units and Offices

Article 8: Composition of the Units and Offices

1. Specialised units shall be composed in government institutions. Their organisational structure and job description shall be approved within the organisational structure of the institution and shall be named the Complaints Units at ministries as a minimum, and Complaints Offices at governorates.
2. The units shall report immediately to the Minister.
3. The units and offices shall report technically to the Directorate General of Complaints at the Prime Ministry. An employee shall assume their administration in accordance with the following criteria:
 1. A civil servant shall assume the administration of the unit in accordance with the functional hierarchy from the A4-C [Grade] and shall be assisted by a sufficient number of employees.
 2. To hold the first university degree.
 3. To have experience for a period of not less than five years in the field of administrative or legal work.
 4. To have adequate experience in dealing with the public as well as in public service ethics.

5. In regard of the Offices of governorates, the Governor may select the person whom he deems to be fit to receive and follow up with the complaints in the governorate.

Article 9: Jurisdictions and Tasks

Jurisdictions and tasks of units and offices:

1. To receive and follow up with the citizens' complaints relating to the performance of government institutions and their employees.
2. To coordinate and cooperate with Directorate General.
3. The units and offices shall coordinate and cooperate amongst them and in relation to complaints and common issues.

Article 10: The Units' Regular Report

The units and offices shall adhere to submitting a regular quarterly report to the Directorate General of Complaints, including information on the complaints; their number; completed, remaining and rejected ones; reasons of delay; in addition to the problems the Unit faces in the course of performing its function in accordance with administrative and legal rules.

Article 11: The Complaints Examined by the Units and Offices

The units and offices shall examine the following complaints:

1. Those filed against the government institutions.
2. Those relating to the follow-up of the execution of the final judicial rulings entered against government institutions.
3. Those lodged by civil society organisations in relation to the performance of the institution to which the units and offices report.

Article 12: The Complaints Not Examined by the Units and Offices

The units and offices shall not examine the following complaints:

1. The complaints heard by the Judiciary.

2. The complaints, on the subject matter of which a definitive judicial ruling had been entered.
3. The complaints pertaining to conflicts between persons, whether they were natural or juridical.
4. The complaints previously presented to the Complaints Unit, which decided to refuse or those which had been processed and a decision made thereon.
5. The complaints on humanitarian aid and external grants.

Chapter IV: Institutions' Commitment and Observation of the Periods of Judicial Contestation

Article 13: Commitment of Official Institutions

In the course of facilitating the mission of the Directorate General of Complaints and units and offices, official institutions with a relation to the subject of the complaint shall be committed to present all the documents related to the issue complained of on the allotted time.

Article 14: The Written Response

The Directorate General of Complaints or the units and offices must respond in writing to the complainant, [regardless of] whether the response was positive or negative, within a maximum period of thirty days.

Article 15: Observation of the Periods of Judicial Contestation

Upon the examination of complaints, the Directorate General of Complaints and the units and offices shall observe the periods of judicial contestation which are applicable at the High Court of Justice and prescribed under the Law of Civil Service, Law of Civil and Commercial Procedure and their amendments, as well as by any other law in this regard.

Article 16: Resorting to the Judiciary

The complainant shall have the right, if he so wants, to resort to the Judiciary to adjudicate his complaint.

**Chapter V:
Complaints against the Directorate General
and Units and Offices**

Article 17: Complaints against Employees of the Directorate General of Complaints

In the event the complaint is filed against the Chairman of or an employee at the Directorate General of Complaints, it shall be submitted immediately to the Secretary General in order to take the proper procedures thereon.

Article 18: Complaints against the Employees of Units or Offices

In the event the complaint is filed against the officer in charge of or an employee at the units and offices, it shall be submitted immediately to the Minister or Governor as the occasion may be in order to take the proper procedures thereon.

Article 19: Malicious Complaints

In case it appears to the Directorate General of Complaints or the units and offices that the complaint filed is a malicious one, the Directorate General or the units or offices shall have the right to take the respective expedient legal proceedings in accordance with the provisions of the laws in force.

**Chapter VI:
Conclusive Provisions**

Article 20: The Annual Report

The Directorate General of Complaints shall adhere to submitting its annual report to the Secretary General as well as any other reports for presentation to the Council of Ministers.

Article 21: The Procedural Manual

The Directorate General of Complaints shall present the Procedural Manual and the forms relating to the complaints as well as circulate them to the units and offices following approval of the Secretary General.

Article 22: Legal Support

The Legal Affairs of the Council of Ministers shall provide legal support to the Directorate General of Complaints. Coordination shall be in place between them.

Article 23: Repealing

The Regulation on the Department of Complaints at the Prime Ministry and Units of Complaints at Ministries, promulgated on May 3rd, 2005, as well as any provision that contradicts the provisions of this Regulation, shall be repealed.

Article 24: Entry into Force and Implementation

All the competent authorities, each within the sphere of its jurisdiction, must implement the provisions of this Regulation, which shall enter into force as of the date of its promulgation and shall be published in the Official Gazette.

Promulgated in the city of Ramallah on March 8th, 2009, [Corresponding to] Rabee' al Awwal 11th, 1429 Anno Hegira.

Salam Fayyad

Prime Minister

Annex 2:

Overview of the DCAF-Office of the President-Council of Ministers Task Force on Complaints Consultation Process

Members of the task force:

- Representative of the Office of the President
- Representatives of the Directorate General of Complaints at the Council of Ministers
- Representative of the Council of Ministers' legal affairs department
- Representative of the PLC staff
- Representative of civil society
- Representative of Birzeit University

	Date	Place	Session	No. of Participants
1	04.03.2012	Ramallah	Preparatory meeting for the task force to agree on the action plan for the <i>Regulation's</i> review process	8 (members of the task force)
2	18.03.2012	Ramallah	First meeting of the task force to discuss all the documents, papers, and reports available about the <i>Regulation</i> and its gaps	8 (members of the task force)
3	01.04.2012	Ramallah	Second meeting of the task force to review the <i>Regulation</i>	8 (members of the task force)
4	15.04.2012	Ramallah	Third meeting of the task force to review the <i>Regulation</i>	8 (members of the task force)
5	29.04.2012	Ramallah	Fourth meeting of the task force to review the <i>Regulation</i>	8 (members of the task force)
6	06.05.2012	Ramallah	Fifth meeting of the task force to draft the proposed draft amendments	8 (members of the task force)
7	04.06.2012	Ramallah	Sixth meeting of the task force to finalize the draft amendments	8 (members of the task force)
8	01.12.2012	Ramallah	Seventh meeting of the task force to review the proposed draft amendment based on the expert's comments	8 (members of the task force)
9	09.12.2012	Ramallah	Eighth meeting of the task force to review the proposed draft amendment based on the expert's comments	8 (members of the task force)
10	20.12.2012	Jericho	Conference 'Complaints Handling Mechanisms in PNA institutions: Reality and Prospects'	40 participants
11	28.03.2013	Ramallah	Ninth meeting of the task force to validate the final reviewed draft amendment	8 (members of the task force)
12	18.12.2013	Ramallah	'First National Complaints Conference: Complaints as a Citizens' Right: Reality and Prospects'	60 participants

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