Egypt's Anti-Corruption Public Policy Ecosystem: An Overview and An Evaluation

Mereet Hany Adly

PhD Researcher in the Department of Political Science, Suez Canal University

Supervised By

Prof. Amany Ahmed Ismail Khodair

Prof. Salwa ElSaid Farrag

Abstract:

Egypt has one of the oldest and most established public administration structures in history. The Egyptian experience with corruption is arguably as old as its public administration. The fight against corruption in Egypt also dates back to ancient times. Focusing on the modern era, most scholars agree that anti-corruption efforts have always been more cosmetic than genuine. Recently, and since 2014, the anti-corruption public policy ecosystem in Egypt has witnessed a new turn, paving the way for what can arguably be considered a new phase of the fight against corruption. Despite efforts, a quick review of international corruption measurements reveals that Egypt continues to suffer high levels of corruption, costing it considerably on the economic, social and political fronts. As such, there remains a need for a comprehensive exploration of the internal structure of the anti-corruption policy ecosystem. In response to this need, this paper poses a key question, namely: How is Egypt's anti-corruption public policy ecosystem structured, and what are its key strengths and limitations? Devoted to untangling this complex structure, the paper explores the legal, institutional and strategic anti-corruption frameworks in Egypt. The paper aims to go beyond merely presenting the features of the existing ecosystem, to providing a general assessment of its capacities and the constraints that may limit its success. The paper's conclusions aim to inform both future research, as well as policy development in the anti-corruption domain.

Keywords:

Anti-corruption public policies, Policy ecosystem, Legal framework, Institutional Framework, Strategic Framework, Egypt.

منظومة السياسات العامة لمكافحة الفساد في مصر: عرض وتقييم

الملخص:

تُعد مصر من أقدم الدول تاريخيًا في امتلاك هيكلًا راسخًا في الإدارة العامة. وتزعم أغلب الدراسات أن تجربة مصر مع الفساد قديمة قدم إدارتها العامة. كما أن جهود مكافحة الفساد تعود إلى عصور مصر القديمة. أما في العصر الحديث، فيتفق معظم الباحثين على أن جهود مكافحة الفساد في مصر اتسمت بطابع شكلي أكثر من كونها جوهرية. منذ عام ٢٠١٤، شهدت منظومة السياسات العامة لمكافحة الفساد في

مصر تحولًا جديدًا، يمهد الطريق لمرحلة يمكن اعتبارها بداية لحقبة مختلفة في مجال مكافحة الفساد. وعلى الرغم من هذه الجهود، فإن المؤشرات الدولية تُظهر أن مصر لا تزال تعاني من مستويات مرتفعة من الفساد، وهو ما يُكلفها كثيرًا على الصعيد الاقتصادي والاجتماعي والسياسي. بناءً على ذلك، تظل هناك حاجة إلى دراسة بنية منظومة السياسات العامة لمكافحة الفساد. واستجابةً لهذا الاحتياج، تطرح هذه الورقة البحثية سؤالًا محوريًا: ما هي أهم ملامح منظومة السياسات العامة لمكافحة الفساد في مصر؟ وما هي أبرز نقاط القوة والقصور فيها؟ تسعى هذه الورقة إلى استكشاف هذه المنظومة المعقدة من خلال استعراض وتحليل الأطر القانونية والمؤسسية والاستراتيجية ذات الصلة. ولا تقتصر أهداف الورقة على عرض مكونات المنظومة الحالية، بل تمتد لتقديم تقييم عام لقدراتها والمعوقات التي قد تحد من فعاليتها. وتطمح النتائج التي تتوصل إليها الورقة إلى إثراء النقاش البحثي وتقديم التوصيات لصناع القرار بشأن السياسات المستقبلية في مجال مكافحة الفساد في مصر.

الكلمات المفتاحية:

السياسات العامة لمكافحة الفساد، منظومة السياسيات، الإطار التشريعي، الإطار المؤسسي، الإطار الاستراتيجي، مصر.

Introduction

Egypt has one of the oldest and most established public administration structures in history. The Egyptian experience with corruption is arguably as old as its public administration. Some academic contributions date it back to Pharaonic Egypt[1]. Despite significant evolution of the state and societal visions of the purpose of government, corruption has arguably accompanied the Egyptian state's governmental structure in its various phases of history until contemporary times.

The fight against corruption in Egypt also dates back to ancient times, where Egyptians were the first exporters of integrity and justice as concepts forming key societal pillars, personified in the goddess *Ma'at*[2]. The Egyptian king Horemheb (1314-1342 B.C.) is believed to have issued the first recorded anti-bribery law[3]. Focusing on the modern era, most scholars agree that anti-corruption efforts have always been more cosmetic than genuine. Laws and policies have usually been promulgated, yet without sufficient attention to implementation or enforcement.

Research Problem

Recently, and since 2014, the anti-corruption public policy ecosystem in Egypt has witnessed a new turn. The national political scene, after two popular uprisings in 2011 and 2013, has paved the way for the government to undertake a new phase of the fight against corruption. The 2014 Egyptian constitution first laid the grounds for such direction, joining very few world constitutions in addressing the issue of governance. In 2015, Egypt has also committed itself to the global Sustainable Development Agenda, formulating its own 2030 vision, and taking serious steps towards realizing target 16.5, involving the reduction of "corruption and bribery in all their forms"[4].

Despite efforts, a quick review of international corruption measurements reveals that Egypt continues to suffer high levels of corruption, costing it considerably on the economic, social and political fronts. As such, there remains a need for a comprehensive exploration of the internal structure of the anti-corruption ecosystem, highlighting areas of strength, and potential limitations.

Research Question

In response to this need, this paper poses a key question, namely: How is Egypt's anti-corruption public policy ecosystem structured, and what are its key strengths and limitations? Several sub-questions are derived from this key question. First, how have anti-corruption efforts in Egypt evolved over time? Second, what are the key features of Egypt's legal anti-corruption framework, and how comprehensive is it? Third, who are the main actors involved in Egypt's anti-corruption policy landscape? Finally, what strategies has Egypt adopted at the national level, and how effective were these in ensuring coherence and dealing with fragmentation?

Research Argument

This paper argues that Egypt's anti-corruption public policy ecosystem post-2014 reflects a significant formal commitment and an evident political will to deal with corruption through legal and institutional mechanisms, under a well-developed strategic framework. However, while each component presents important strengths, the overall system reveals limitations in coherence, inclusiveness, and implementation. A clearer understanding of these gaps is considered essential for informing future policy design, enhancing coherence across governance actors, and contributing to broader regional and international discussions on anti-corruption reform.

Research Objectives

This paper is devoted to untangling the complex anti-corruption ecosystem in Egypt, particularly after 2014. This is done by exploring the legal, institutional and strategic frameworks. The particular aim of the paper is to explore the entities which interact with one another in light of an existing structure, forming what can be termed as the anti-corruption policy ecosystem in Egypt. As such, the focus is on both the structure and the agency in this ecosystem. This conceptualization challenges the linear understanding of policymaking offered by the stages/cycle model. It rather seeks to achieve a concise understanding of the milieu in which different actors are involved, drawing the features of anti-corruption in Egypt post-2014.

The paper aims to go beyond merely presenting the features of the existing ecosystem, to providing a general assessment of its capacities and the constraints that may limit its success. The paper's conclusions aim to inform both future research, as well as policy development in the anti-corruption domain.

Research Methodology

This paper's methodology is mainly qualitative, and desk based. It draws primarily on a review of scholarly literature and official government documents, accessed through official websites. Although the study does not involve primary fieldwork, the analysis is informed by insights gathered through direct observation and participation in public trainings, lectures, conferences, and policy forums related to governance and anti-corruption in Egypt. This combination of sources ensures a sufficient presentation of contextualized understanding of the legal, institutional, and strategic components of the national anti-corruption efforts.

Research Division

To reflect on the paper's main and sub-questions, the below discussion is divided into four main sections. The first section presents a rough historical overview of anti-corruption efforts in Egypt since the 1950s. The following three sections separately address the legal, institutional, and strategic frameworks. Key reflections and conclusions are then elaborated on.

A. A Historical Overview of Anti-corruption Efforts in Egypt

Exploring the Egyptian anti-corruption efforts requires that we shed light on the historical precedents of the contemporary public policy ecosystem. According to Counsellor Dr. Marian Kaldas, the Executive Director of the Egyptian Centre for Arbitration and Settlement of Non-Banking Financial Disputes, in her extensive doctoral thesis studying anti-corruption in Egypt, the modern Egyptian fight against corruption can be broken down into four main phases.

The first phase (1950-1970) has witnessed the adoption of a legislative criminal policy, directed at combatting corruption, particularly illicit enrichment, and reforming the public sector to allow it to play the expanding roles that the revolutionary government has promised. Examples include the "purification of government administration" law issued in 1952, and law number 181 of the same year, which allowed for the dismissal of public officials involved in corruption. Laws criminalizing bribery were issued and amended in 1953, 1957 and 1962. This phase also witnessed the creation of key oversight bodies, particularly the Administrative Prosecution Authority (APA) in 1958, the Central Auditing Organisation (CAO) in 1964, and the Central Agency for Organization and Administration (CAOA) in the same year. Despite these measures, corruption continued to expand with the size of the government.

The second phase covers the presidency of Sadat, until the beginning of the Mubarak era. During this phase, the state's economic direction has dramatically changed. Efforts were made to regain investors' trust. The 1971 constitution was promulgated in this context. Bribery law was amended again in 1975, as well as the civil servants' law in 1971. These efforts aimed at protecting the integrity of the civil servants. However, since laws do not operate in vacuum, the context of *Infitah* economic policies did not help these laws realize their goals. Thus, corruption continued to grow and expand.

The third phase, from 1981 to 2011, witnessed what scholars conceive as the corrupt "marriage of wealth and power". This does not mean that no anti-corruption measures were taken though. Laws were issued to organize procurement and forbid monopolistic practices in 1998 and 2005 respectively. The Money Laundering Unit in the Ministry of Justice was created in 2002. Like previous periods, these moves proved only cosmetic, covering for an ever-growing infrastructure of grand corruption[5].

This quick overview of the first three phases of anti-corruption in Egypt reveals that policies were majorly *de jure,* focusing on issuing or amending laws to provide foundations for anti-corruption. *De facto* policies targeting the enforcement of these laws were largely absent. Functionally, most policies were focused on detection and repression, rather than prevention of corruption. As for the direction/pattern of policies, this was predominantly top-down, sidelining any serious bottom-up measures. Mechanisms employed mainly targeted changing the effort and changing the potential risks and rewards system. Raising awareness or changing the incentives via institutionalizing a full-fledged good governance system were never included in the anti-corruption vision of any of the three historical phases. Finally, implementation tools were almost exclusively authoritative in nature, relying on state-enforced sanctions to direct change away from corruption. This policy portfolio proved insufficient in curbing corruption or achieving on-ground improvements.

After 2011, Egypt has entered a new phase of its modern history. The commencement of this phase was marked by political instability, social tensions, constant protests and power fragility. Accordingly, anti-corruption failed to make it to the top of the policy agenda[6]. The relative political stability that came with 2014 marked not only a fourth phase in the anti-corruption policy journey, but also a new era in the Egyptian policy scene at large. The below sections mainly focus on the anti-corruption policy ecosystem in Egypt starting 2014.

B. The Legal Framework

The significance of the anti-corruption legal framework stems from the fact that as a crime, it lacks a clear identification of the victim, who in this case is not necessarily an individual, but can possibly be "the public interest"[7]. Accordingly, the existence of laws to allow regulatory and supervisory entities to control corruption is vital, since the act might be consensual between the parties involved[8].

Before delving into the legal framework governing contemporary anti-corruption policies in Egypt, it is important to shed light on the international legal framework in which Egyptian laws are formulated. Egypt is a signatory to several key international anti-corruption instruments, including the United Nations Convention Against Corruption (UNCAC) since 2003,

United Nations Convention Against Transnational Organized Crime (UNTOC) since 2004, the Arab Anti-Corruption Convention (AAC) since 2010, the African Union Convention on Preventing and Combating Corruption (AUCPCC) since 2017, as well as the African Peer Review Mechanism. Egypt is also a member of Financial Action Task Force
(FATF), complying with its recommendations as of 2021[9]. Together, these instruments guide national anti-corruption laws. Although some laws do predate these agreements, they work within the same direction[10].

On the national level, one can differentiate between different sets of law that have evolved over the years. First, laws that criminalize corruption and its different forms. Perhaps the most important law in this category is the Egyptian Penal Code and its amendments (Law 58 of 1937). The code has chapters dedicated to criminalizing bribery, misappropriation of public funds, treachery, and forgery. The Criminal Procedure Act and its amendments (Law 150 of 1950) complement the Penal Code, specifying the responsibilities of investigating authorities, detailing procedures of arrest, search, and seizure[11]. It is worth noting that the latest proposed amendments to the Act in 2024, for the first time, included reference to protection of witnesses and whistleblowers[12]. Although this amendment is not particularly concerned with corruption cases, it is a very important one for anti-corruption purposes. This laws' bundle also includes several laws criminalizing specific forms of corruption. For example, illicit gain is criminalized by Law 11 of 1968, amended by Law 62 of 1975, money laundering is also addressed in a separate Law number 80 of 2002, amended by Law 36 of 2014, and conflict-of-interest is addressed in Law 106 of 2013[13].

Second, there is a body of laws that deal with regulating major governmental agencies/procedures, ensuring the control of corruption in key sectors. This includes the State Lawsuit Authority Regulation Law (75 of 1963), amended by Law 10 of 1986, as well as the Police Authority Law (109 of 1971), which addresses corruption-related crimes like forgery, bribery, influence-peddling, embezzlement, illicit gain and money laundering. This law's anti-corruption capacities were later complemented with Presidential Decree number 10 for 1984, which established the General Department for Combating Public Funds Crimes (GDCPFC). Other relevant laws here are the Judiciary Law and its amendments (46 of 1972), the State Council Law (47 of 1972), the Public Agencies Legal Departments Law (Law No. 47 of 1973), the Leadership Positions Law (5 of 1991) and its amendments, the Public Procurement Law (89 of 1998) and its amendments (Law 182 of 2018), the Central Bank and Banking System Law and its amendments (88 of 2003), and the Competition Regulation and Prevention of Monopoly Practices Law (3 of 2005)[14]. A key legislation belonging to this category is the Civil Service Law

(81 of 2016). It is worth noting that this law's precedent was named "Public Sector Employees Law" (47 of 1978). However, as part of the public administration reform strategy, the law's essence and name were changed. It came to introduce new procedures for merit-based public sector employment, performance management, work environment improvements and standardization of structures and hierarchies. The law's new name also implies a change in the mindset, from government sector employment serving an employee's interest to civil service targeting the public interest[15].

Third, one can list several laws regulating the creation and functioning of anti-corruption authorities. This includes the Administrative Prosecution and Disciplinary Courts Regulation Law and its amendments (Law 117 of 1958), which governs the operations of oversight, examination, and investigation of public officials by the administrative prosecution. Also, the Administrative Control Authority (ACA) Law (Law 54 of 1964), and its latest amendments (207 of 2017) and (160 of 2018), is a key law under this category. This law specifies the work and responsibilities of the authority. This set of laws also include the laws regulating the roles of various anti-corruption bodies, like CAOA law and its amendments (Law 118 of 1964), the CAO Law and its amendments (Law 144 of 1988), and the General Authority for Financial Control Law (10 of 2009)[16].

All the above laws are interpreted and applied within a rigorous judicial regulatory framework composed of courts on various levels. These include the Higher Constitutional Court, Ordinary Courts, Public Prosecution, State Council, State Lawsuits Authority, and Administrative Prosecution Authority[17].

Despite the absence of a general overarching anti-corruption law, most observers would argue that the existing legal framework is extensive and broad, providing a strong basis for anti-corruption efforts. Yet, most critics point out to the absence of two important anti-corruption legislations, namely an access to information law and whistleblowers protection law[18]. The absence of whistleblowers protection was particularly pointed out in the 2015 and 2020 review cycles of the implementation of UNCAC[19]. The 2015 review has provided specific details on the needed protections and measures[20]. Although a draft law was prepared by the government in 2014, this has never been materialized into a law[21]. According to a press interview with Medhat Elsherif, Parliament Economic Committee Deputy in 2022, challenges facing this law include financing the department responsible for whistleblowers and witnesses' protection in the Ministry of Interior, identifying the identity of persons qualifying for protection, and determining the periods of protection[22].

C. The Institutional Framework

The institutional anti-corruption framework in Egypt is composed of two main types of oversight bodies. The first is

Public Control Agencies. This is represented by the ACA[23]. As previously noted, the ACA was established in 1964. Its aim is to act as the main independent general oversight body responsible for corruption control in public bodies. The law outlining its competencies was amended in 2017 and 2018, to stipulate, according to articles 2 and 3, that the agency investigates shortcomings in public administration, recommends solutions, monitors law enforcement and implementation, detects violations by public officials and others affecting public service integrity, handles citizen and media-reported complaints on corruption, and provides relevant data and studies to top government officials[24].

The scope of competences of the ACA includes the public administration and its branches, public agencies, public sector, public and private associations and sectors engaging in public work, as well as all agencies to which the sate contributes[25]. As for the crimes that the ACA is concerned with, these include crimes of aggression against public funds (embezzlement, abuse of funds, fraud…etc.), crimes of exploiting public office (bribery and abuse of power), counterfeiting of official documents, illicit gain, impersonating a civil servant to obtain any profit or benefit, crimes related to foreign exchange transactions, human organ transplantation, and human trafficking[26]. The ACA also coordinates with other relevant bodies on a number of other crimes including tax and customs evasion, money-laundering, commercial fraud, and public health crimes.

Internally, the ACA is divided into administrative units, each concerned with a specific sector, namely education, healthcare, and higher education, among others. It carries out its responsibilities through four central departments and twenty-three regional offices[27]. Until recently, the ACA was exclusively formed of former military and police officers. Since 2019, it started to widen its pool of candidates, appointing civilians from university graduates, after thorough integrity and security screening[28]. According to the first review cycle of the implementation of UNCAC conducted in 2015 by Burkina Faso and Algeria, the ACA has adequate resources, be these financial, technical or human resources, to perform the functions it is supposed to deliver[29].

The 2017 ACA Law amendment has also introduced a new training arm, namely the National Anti-corruption Academy (NACA). According to article number 55, the main objective of this academy is to educate and train the ACA's members to better perform their jobs, in addition to supporting the cooperation with other anti-corruption agencies worldwide. The Academy is also concerned with raising public awareness of corruption risks, anti-corruption significance, and values of integrity and transparency[30]. The establishment of the NACA came to reflect a new approach to anti-corruption in Egypt, exemplifying a direction of combatting corruption through culture, which extends the temporal and spatial impact of anti-corruption efforts, encompassing "prevention" as a key element as well[31].

The second type of oversight bodies is the External Control Agencies, each of which is focused on a specific type/domain of corruption. This category comprises several institutions, including the CAO, the Ministry of Finance agencies and units (financial controllers), the CAOA, the APA, the Illicit Gains Authority, the GDCPFC (Ministry of Interior), the Anti-Money Laundering and Combating the Financing of Terrorism Unit, and the Financial Regulatory Authority (FRA)[32]. The below table summarizes the main objectives/foci of each of these agencies.

Table (5): Egypt's Anti-Corruption Institutional Framework[33]

Agency	Objective/Focus
The Central Auditing Organization (CAO)	Responsible for all government revenues and expenditures. Its mandate includes the oversight of trade unions, political parties, and professional associations[34].
The Ministry of Finance (Financial Controllers)	Besides its main role in designing and implementing fiscal policies, the ministry has an anti-corruption supervisory role over all financial and accounting entities, ensuring their compliance with state laws and regulations[35].
The Central Agency for Organization and Administration (CAOA)	Responsible for reforming the public administrative body and improving its efficiency. Its anti-corruption role is mainly preventive, performed via maintaining high standards for governance and accountability. This involves proposing relevant laws, inspecting personnel departments, improving employee selection systems and reforming the salaries and bonuses' system[36].

The Administrative Prosecution Authority (APA)	Tasked with monitoring and investigating crimes, both of administrative and financial natures, involving civil servants in all governmental bodies and across levels. The authority hands over offenders to criminal court. It also works as a platform for whistleblowing, allowing officials to report cases of corruption[37].
The Illicit Gains Authority (IGA)	Empowered with significant legal authority, it oversees the integrity of public officials on the financial level. It regularly examines financial disclosure statements and investigates complaints concerning illegal wealth associated with potential corruption[38].
General Department for Combating Public Funds Crimes (GDCPFC)	Working as part of the Ministry of Interior, it addresses a range of economic corruption-related crimes like bribery, forgery, money laundering, influence trading, currency smuggling, and fraud[39].
The Anti-Money Laundering and Combating the Financing of Terrorism Unit	Collaborates with investigative bodies domestically and internationally to scrutinise and investigate cases involving suspicious economic activity, and coordinates with the judicial authorities[40].
The Financial Regulatory Authority	Works on regulating the non-banking financial sector, increasing disclosure and transparency and controlling corruption[41].

The different institutions coordinate their work through National Committees responsible for policy design, integration, and alignment of all efforts towards a strategic national vision, in light of the international legal frameworks that Egypt has committed itself to. Metaphorically, these committees are the kitchen in which all institutional ingredients are processed[42]. Chief among these committees is the National Coordinating Committee against Corruption (established in 2010 and chaired by the Prime Minister), and the National Coordinating Subcommittee against Corruption (established in 2014 and headed by the chair of the ACA)[43]. The former acts as the main supervising and synchronizing body for all anti-corruption efforts, and the latter, being embedded under the former, is responsible for developing the strategy and suggesting reforms, while maintaining effective communication between anti-corruption agencies[44].

Providing a general assessment of the anti-corruption institutional framework in Egypt, some Western critics question the independence of anti-corruption agencies[45]. One needs to point out here that the 2014 Egyptian Constitution has been wary of this matter though. Accordingly, it devoted Chapter 11 of Part 5 to discussing "Independent Bodies and Oversight Agencies". It affirmed in article number 215 that regulatory agencies shall enjoy technical, financial and administrative independence[46]. Additionally, article 16 has specified that the law shall protect the independence of these bodies and that their heads shall be appointed by the President following the approval of the majority of the House of Representatives, yet they shall only be dismissed from their position in specific cases identified by the law[47]. In addition to constitutional guarantees, the real independence of anti-corruption regulatory bodies remains a matter of political will, which arguably still manifests in the various reforms that the Egyptian government has pursued in recent years. Even if deviations endure, the existing framework would empower these institutions, provided that political will exists. Other critics have considered the existence of numerous bodies a sign of weakness of the administrative apparatus. This also further complicates the process of integration and coordination among the different relevant bodies[48]. Cases of officials inside these institutions being charged with corruption crimes themselves present a puzzling dilemma as well.

Another important critique comes from the fact that the anti-corruption policy ecosystem in Egypt is mostly dominated by state apparatus, with very little role for civil society organizations and a marginal contribution from the media[49]. This was noted in the 2014 National Integrity System assessment done by TI. In this assessment, the dominance of the executive pillar was highlighted, raising concerns about it dominating the scene and preventing other pillars, like civil society, media, and businesses from efficiently fulfilling their roles[50]. It is important to note though that the anti-corruption policy ecosystem in Egypt does not operate in vacuum. It does in the context of turbulent regional arrangements, a recent pandemic, a challenging developmental scene and an immature legislative framework governing relevant aspects. This might explain the ability of the executive to play a more consistent role, compared to other actors, like the civil society, which lacks the effectiveness or the capacities to be present on the ground.

That said, it is worth noting that some civil society organizations do play a minimal role in the anti-corruption ecosystem, mostly focused on organizing conferences and trainings. Some of these organizations include: the Egyptian Transparency Network (*Al-Shababka Al Masriya Ltaazeez Al-shafafeya*), Egyptians Against Corruption (*Masryoon Ded Al-Fasad*), and We See You (*Shayfenkom*)[51]. Similarly, the media does play some role working as a watchdog and sometimes lobbying for anti-corruption enforcement, at least on the level of the grassroots and petty corruption. Yet, the independence and partiality of media is occasionally questioned by a broad base of the citizenry. Thus, social media provided an alternative media channel for playing a more effective role in some cases. As for the business community's involvement, this is relatively limited and confined in its contributions to raising awareness campaigns[52].

D. The Strategic Framework

The Egyptian Constitution of 2014 was one of the few fundamental laws that directly addressed corruption and obliged the government to take serious steps to combat it. This was stated in article number 218[53]. In accordance with the constitutional provision, the National Anti-corruption strategy was developed on three main phases. The first phase covered the period from 2014 to 2018. The second covered 2019 to 2022, and the third and current phase started in 2023 and shall continue until 2030. The different phases were developed in close alignment with Egypt vision 2030[54]. The formulation of strategies reflects the state's vision to fight corruption through a comprehensive governance framework that not only curbs corruption, but also fosters principles of good governance[55].

The first strategy had ten general objectives addressing the challenges identified in the strategy as the main reasons behind corruption in Egypt. These objectives are also based on a thorough examination of the strengths, weaknesses, strengths and opportunities of the national environment. Its main success was that it managed to put the issue of corruption on the public policy agenda. This was manifested in three main paths that the government has taken. The first is legal in nature, working on the infrastructure of laws that would pave the way for anti-corruption efforts, as explained above. The second is concerned with empowering the supervisory authorities to perform their role in combatting corruption. Finally, asserting the political will of the leadership to take meaningful steps to enforce laws[56]. According to Mahmoud Khalifa and Amany Khodair, evidence on these two points can be seen in the continuous increase of corruption cases completed by the APA, which has jumped from 130,563 in 2013, to 148,815 in 2014, to 153,763 in 2015, to 189,156 in 2016[57]. Another strong manifestation of the policy's direction is the change in the public procurement system in 2018, which superseded previous systems and paved the way for just competition based on objectivity and transparency. The online Government Contracting/Procurement System was a unique practice in the region, assisting with the control of corruption in this important sector[58].

The second strategy built on the previous, focusing on addressing the challenges that faced it in the implementation of its goals[59]. The lessons learnt from the first phase have also pointed to the difficulty of measuring progress. Thus, the second strategy has given special attention to goal attainments measurement in quantitative terms[60]. This was reflected in the follow-up report issued by the ACA in 2022, concluding the achievements and shortcomings pertaining to the nine strategic goals of the strategy. Overall, the strategy's ability to achieve its goals was estimated to be 86%.

The report has also outlined the most successful practices, chief among which are the following. First, the offering of 140 governmental services online through Egypt Digital Services Portal, and the enhancement of Egypt's e-government infrastructure in general in different domains. Second, the development of the Code of Conduct for Public Officials, in accordance with article 57 of the Civil Service Law number 81 of 2016, with clear Key Performance Indicators (KPIs). Third, the development of the Internal Audit Units (IAUs) in 73 governmental institutions and the publication of the relevant manuals. Fourth, the full activation of the Government Financial Management Information System, which integrates the different financial units in the government through technology. Fifth, the establishment of the "Egypt Award for Government Excellence", to motivate a sense of competitiveness among governmental bodies in seeking citizen satisfaction and enhancing integrity. Sixth, the issuing/amendment of some relevant anti-corruption laws, as outlined above. Seventh, enhancing the policy integration infrastructure in the anti-corruption policy ecosystem. Eighth, fostering Egypt's presence and active role in regional and international anti-corruption communities. Finally, spreading public awareness through universities, academic programmes, workshops and other NACA efforts[61].

Challenges have also been highlighted in the report. The most notable ones are: first, the failure to enhance the legal anti-corruption infrastructure, evident in the inability to promulgate whistleblowers' protection law, access to information law, and international cooperation in criminal affairs law, and the failure to activate the conflict-of-interest law. Second, the failure to establish a working mechanism for citizens to evaluate governmental services, and the delay in the implementation of the "workers' satisfaction with the work environment" survey. Third, the inability to publish the National Corruption Perception Index since 2020, due to Covid-19. Finally, the absence of an active role for the civil society in anti-corruption efforts[62].

The most recent strategy (2023-2030) has defined its vision as seeking "a national environment characterized by integrity that combats corruption"[63]. This vision has been translated into five main strategic goals: first, an efficient administrative body capable of providing effective services to the public and to investors. Second, a supportive legislative and judicial anti-corruption infrastructure, ensuring justice is swiftly realized. Third, entities capable of combating corruption and enforcing the law. Fourth, a society aware of corruption risks and capable of fighting it. Finally, effective international and regional cooperation in the domain of anti-corruption[64]. These goals include twenty-one sub-goals and 219 measurement indicators.

Unlike the manual follow-up process adopted in the first two phases, the monitoring of the third phase is expected to be electronic, through coordinators in 120 contact points addressing the set KPIs on a unified portal developed by the ACA, in collaboration with USAID Economic Governance Activity (EGA) project[65]. According to Mohamed Naama, this electronic Performance Management and Monitoring System (PMMS) is the first of its kind in the MENA region, providing a cutting-edge evidence-based verification of the strategy's achievements and challenges, through consistent real-time data integration and analysis[66].

Most countries succeeding at controlling corruption have started their journey with a well-formulated National Anti-corruption Strategy[67]. The strategy and its development and adoption process has been commended in several writings, including the second cycle of review of implementation of UNCAC in 2020[68]. Specifically, the strategy's ability, across its different phases, to define the problem and its reasons from a local point of view, in addition to its reliance on diverse mechanisms and implementation tools, have been highlighted as key successes[69].

Conclusion

Discussing anti-corruption efforts must be done in light of a thorough reading of the global corruption scene. Taking into consideration the facts that the global Corruption Perception Index (CPI) average in 2023 was just 43, and that two thirds of the world countries encompassing 80% of the world population scored below 50 out of 100 possible points[70], the figures about Egypt would seem less gloomy, since most world countries, including developed ones, appear to be struggling with corruption control. Another important matter to take into consideration is that positive reflection of anti-corruption efforts on corruption indices is not necessarily immediate. Some anti-corruption policies are more long-term in nature; thus, their expected results take years to materialize. Accordingly, it would be unfair to dismiss the public policy that Egypt is currently pursuing on the premises of the indicators not reflecting remarkable improvement from 2014 until now.

Proper exploration of policies and policy developments necessitate a thorough exploration of the anti-corruption public policy ecosystem in Egypt, which this paper has attempted to do. As such, the relevant structure and agency interplay was presented, with a specific focus on the legal, institutional and strategic frameworks governing anti-corruption public policy. The key takeaways from this presentation are as follows: first, the Egyptian anti-corruption legal framework seems to be extensive and comprehensive, but for specific gaps, namely regarding the access to information law and the whistleblowers protection law. The existence of laws *per se* is not enough. Enforcement can only be guaranteed through a strong institutional framework, which takes us to the second takeaway.

Egypt enjoys a wealth of complex anti-corruption institutional structure of oversight bodies, including public and external control agencies, each of which has its own mandate and scope. Despite reservations on the independence of these bodies, their strength and possible desertion, the anti-corruption institutional arm in Egypt seems sufficient to carry out the roles it is expected to do, particularly with the lack of integration being recently addressed by the formation of the National Coordinating Committee against Corruption and its sub-committee.

Quantitative sufficiency falls short of bringing about effective policy change though. For years, institutions have existed, with little success or achievement, since these institutions have been working without strategic direction for them to work within. The third takeaway here is that this issue was realized in 2014 and thus was overcome with the launching of the National Anti-corruption strategy.

The challenge ahead lies not in producing additional laws, institutional arrangements, or strategies, but in coordinating existing ones more effectively and embedding them within broader governance reforms. Further research is needed to assess how these frameworks operate/should operate in practice. Ultimately, understanding the structure of anti-corruption framework is not an end in itself, but a means to inform reforms targeting fostering more inclusive, transparent, and effective public administration.

References

[1] Christopher Eyre, 'Patronage, Power, and Corruption in Pharaonic Egypt', *International Journal of Public Administration* 34, no. 11 (September 2011): 701–11, https://doi.org/10.1080/01900692.2011.598286.

[2] Marian Kaldas, 'An Interdisciplinary Inventory of Anti-Corruption Solutions: Towards A Better Anti-Corruption Strategy Adapted to Egypt's Context' (Doctoral Thesis, Université de Montréal, 2019), 1–2, https://papyrus.bib.umontreal.ca/xmlui/handle/1866/24283.

[3] Mohamed 'Arafa, 'Feeding the Cats: The Corruption Conundrum in the Failed Arab Spring-Egypt', *Southern Illinois University Law Journal* 48, no. 1 (2023): 21.

[4] United Nations Department of Economic and Social Affairs, 'Goal 16', Sustainable Development Goals, 2015, https://sdgs.un.org/goals/goal16#targets_and_indicators.

[5] Marian Kaldas, 'An Interdisciplinary Inventory of Anti-Corruption Solutions: Towards A Better Anti-Corruption Strategy Adapted to Egypt's Context', *op. cit.*, 253–55.

[6] *Ibid.*, 256–57.
[7] Leslie Holmes, *Corruption: A Very Short Introduction*, 1st edition (Oxford, United Kingdom: Oxford University Press, 2015), 72.
[٨] سوزى عدلي ناشد، "دور منظمة الشفافية الدولية في مكافحة الفساد وآثاره الاقتصادية: دراسة تطبيقية على مصر"، مجلة البحوث القانونية والاقتصادية جامعة بني سويف ٣٠، ٢ (٢٠١٨):٢١٩.
[9] Denisse Rodriguez-Olivari, 'Egypt: Corruption and Anti-Corruption. A Focus on Non-Financial Corruption Risks', Transparency International U4 Anti-Corruption Resource Centre, August 2024, 15, https://www.u4.no/publications/egypt-corruption-and-anti-corruption-a-focus-on-non-financial-corruption-risks, 20–21.
[١٠] الرائد/أيمن طارق و أ/نادين فودة، "منظومة مكافحة الفساد في مصر"، محاضرة مقدمة من إدارة التعاون الدولي بهيئة الرقابة الإدارية بالأكاديمية الوطنية لمكافحة الفساد (١ سبتمبر ٢٠٢٤).
[11] Ramy El-Kady, 'Examining and Combating Corruption in Egyptian Criminal Legislation', in *Advances in Human Services and Public Health*, ed. Ibrahim Nandom Yakubu (IGI Global, 2024), 118–31, https://doi.org/10.4018/979-8-3693-2101-0.ch008.
[١٢] "مجلس النواب يعلن موافقته من حيث المبدأ على قانون الإجراءات الجنائية"، اليوم السابع"، ١٧ ديسمبر ٢٠٢٤، https://www.youm7.com/story/2024/12/17/مجلس-النواب-يعلن-موافقته-من-حيث-المبدأ-على-قانون-الإجراءات/٦٨١٤٨١٩؛
'Justice Minister: Draft Criminal Procedures Law Sets Pretrial Detention Regulations, Anti-Corruption Provisions', State Information Service, 3 November 2024, https://sis.gov.eg/Story/197783/Justice-Minister-Draft-Criminal-Procedures-Law-sets-pretrial-detention-regulations%2c-anti-corruption-provisions?lang=en-us.
[١٣] "الإطار التشريعي"، هيئة الرقابة الادارية، https://aca.gov.eg/News/1625.aspx؛
'Anti-corruption، & Integrity Map', Arab Anticorruption and Integrity Network, 17 January 2024, https://www.arabacinet.org/ar/integrity-map/egypt/print.
[١٤] "الإطار التشريعي"، مرجع سبق ذكره.
[15] Saleh ElSheikh, 'Public Administration Reforms in Egypt: The Way Forward' (Keynote Speech, Annual Conference of the Association for Middle Eastern Public Policy & Administration, The American University in Cairo, 21 December 2024).

[١٦] "الإطار التشريعي"، مرجع سبق ذكره؛
Rodriguez-Olivari, 'Egypt', *op. cit.*, 21–22.

[١٧] "الإطار التنظيمي القضائي"، هيئة الرقابة الادارية، https://aca.gov.eg/News/1628.aspx.

[18] 'Anti-corruption & Integrity Map', *op. cit.*

[19] 'Review of Implementation of the United Nations Convention against Corruption: Arab Republic of Egypt (Chapters III and IV)', 2015, 8–9, https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1503752e.pdf; 'Review of Implementation of the United Nations Convention against Corruption: Arab Republic of Egypt (Chapters II and V)', 2020, 9, https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries2/V2000131e.pdf.

[20] 'Review of Implementation of the United Nations Convention against Corruption: Arab Republic of Egypt (Chapters III and IV)', *op. cit.*, 6.

[٢١] وزارة التخطيط والمتابعة والإصاح الإداري، "مدونة سلوك وأخلاقيات الوظيفة العامة وفقا للمادة (٧٥) من قانون الخدمةالمدنية ٨١ لسنة ٢٠١٦"، ٢٠١٩، https://aca.gov.eg/News/1722.aspx.

[٢٢] هاجر صلاح، "معرضون للانتقام أو الإيذاء الجسدى والوظيفى.. القانون لا يحمى «المبلغين» عن الفساد!"، الأهرام اليومي، ٢ فبراير ٢٠٢٢،
https://gate.ahram.org.eg/daily/News/204017/3/841878/تحقيقات/معرضون-للانتقام-أو-الإيذاء-الجسدى-والوظيفى-القان.aspx.

[٢٣] "الإطار المؤسسي"، هيئة الرقابة الادارية، https://aca.gov.eg/News/1627.aspx.

[٢٤] جمهورية مصر العربية، "القانون رقم ٥٤ لسنة ١٩٦٤ بشأن إعادة تنظيم هيئة الرقاية الإدارية وتعديله بقانون رقم ٢٠٧ لسنة ٢٠١٧ والقانون ١٦٠ لسنة ٢٠١٨"، https://aca.gov.eg/News/1621.aspx.

[٢٥] "نطاق الاختصاص"، هيئة الرقابة الادارية، https://aca.gov.eg/News/1622.aspx.

[٢٦] "الجرائم التي تختص الهيئة بضبطها"، هيئة الرقابة الادارية، https://aca.gov.eg/News/1623.aspx.
Amr Adel, 'Development of the Administrative Control Authority's Legislative Competence', *Conscience of the Nation*, December 2021, 22.

[27] Lameece Gasser, 'Corruption as a Collective Action Problem: Enabling the Administrative Control Authority in Egypt' (Master's Thesis, Egypt, The American University in Cairo, 2018), 34, https://fount.aucegypt.edu/etds/476.

[٢٨] العميد/عبد المجيد الفقي، "التعريف بدور هيئة الرقابة الإدارية" ، محاضرة عامة بالأكاديمية الوطنية لمكافحة الفساد (١ سبتمبر ٢٠٢٤).
[29] 'Review of Implementation of the United Nations Convention against Corruption: Arab Republic of Egypt (Chapters III and IV)', *op. cit.*, 8.
[٣٠] جمهورية مصر العربية، "القانون رقم ٥٤ لسنة ١٩٦٤ بشأن إعادة تنظيم هيئة الرقابة الإدارية وتعديله بقانون رقم ٢٠٧ لسنة ٢٠١٧ والقانون ١٦٠ لسنة ٢٠١٨"، مرجع سبق ذكره.
[31] Adel, 'Development of the Administrative Control Authority's Legislative Competence', *op. cit.,* 23.
[٣٢] "الإطار المؤسسي"، مرجع سبق ذكره.
[33] Table developed by the author.
[٣٤] "العمل الرقابي"، الجهاز المركزي للمحاسبات، https://asa.gov.eg/Page.aspx?id=5_97.
[٣٥] ناشد، "دور منظمة الشفافية الدولية في مكافحة الفساد وآثاره الاقتصادية: دراسة تطبيقية على مصر"، مرجع سبق ذكره، ١٩٩–٢٠٠؛

Rodriguez-Olivari, 'Egypt', *op. cit.*, 23.
[36] 'Central Agency for Organization and Administration', State Information Service, 17 November 2023, https://beta.sis.gov.eg//en/egypt/political-system/regulatory-authorities/central-agency-for-organization-and-administration/.
[٣٧] ناشد، "دور منظمة الشفافية الدولية في مكافحة الفساد وآثاره الاقتصادية: دراسة تطبيقية على مصر"، مرجع سبق ذكره، ١٩٨؛

Rodriguez-Olivari, 'Egypt', *op. cit.*, 24.
[٣٨] ناشد، "دور منظمة الشفافية الدولية في مكافحة الفساد وآثاره الاقتصادية: دراسة تطبيقية على مصر"، مرجع سبق ذكره، ٢٠٠؛

Rodriguez-Olivari, 'Egypt', *op. cit.*, 24.
[39] Rodriguez-Olivari, 'Egypt', *op. cit.*, 24.
[٤٠] ناشد، "دور منظمة الشفافية الدولية في مكافحة الفساد وآثاره الاقتصادية: دراسة تطبيقية على مصر"، مرجع سبق ذكره، ٢٠٠–٢٠١.
[41] The Financial Regulatory Authority, 'FRA Vision & Objectives', accessed 26 December 2024, https://fra.gov.eg;

دستور جمهورية مصر العربية، مرجع سبق ذكره، ٢٢١.
[٤٢] الرائد/أيمن طارق و أ/نادين فودة، "منظومة مكافحة الفساد في مصر"، مرجع سبق ذكره.
[٤٣] "اللجنة الوطنية التنسيقية"، هيئة الرقابة الادارية، https://aca.gov.eg/News/1630.aspx.

[44] Lameece Gasser, 'Corruption as a Collective Action Problem: Enabling the Administrative Control Authority in Egypt', *op. cit.,* 29–30; Ahmed Nader Ahmed Tawfik Ibrahim, 'Corruption in Egyptian Construction: An Anti-Corruption Framework', *op. cit.,* 55.
[45] Rodriguez-Olivari, 'Egypt', *op. cit.,* 26–27.
[٤٦] دستور جمهورية مصر العربية، ٢٠١٤، المادة ٢١٥.
[٤٧] المرجع السابق، المادة ٢١٦.
[48] Sofia Wickberg, 'Best Practices in Engaging Youth in the Fight Against Corruption', Transparency International U4 Anti-Corruption Resource Centre, 16 July 2013, 6, https://www.u4.no/publications/best-practices-in-engaging-youth-in-the-fight-against-corruption.
[49] Rodriguez-Olivari, 'Egypt', *op. cit.,* 22-27.
[50] Transparency International, 'Egypt National Integrity System Assessment', 2014, 4–5, https://images.transparencycdn.org/images/2014_NIS_Egypt_EN.pdf.
[51] Ahmed Alaa Fayed, 'The Current Status of Corruption in Egypt', Contemporary Arab Affairs 10, no. 4 (2017): 519.
[52] Wickberg, 'Best Practices in Engaging Youth in the Fight Against Corruption', *op. cit.,*10.
[٥٣] دستور جمهورية مصر العربية، مرجع سبق ذكره، المادة ٢١٨.
[٥٤] طارق الحصرى، "الحوكمة في القطاع الحكومي المؤشرات والممارسات في مصر خلال الفترة من ٢٠٠٦-٢٠٢١"، *الحوكمة والوقاية من الفساد ومكافحته* ١، ١ (٢٠٢٤): ٣٠-٣١، https://doi.org/10.21608/jgpcc.2024.277650.1007.
[٥٥] اللجنة الوطنية التنسيقية للوقاية من الفساد ومكافحته، "الاستراتيجية الوطنية لمكافحة الفساد (٢٠٢٣-٢٠٣٠)"، مرجع سبق ذكره، ٣٣–٣٤.
[٥٦] "مصر تحارب الفساد وتعزز قيم النزاهة والشفافية"، الهيئة العامة للاستعلامات، ٢٠٢٢، https://www.sis.gov.eg/

[57] Mahmoud Khalifa and Amany Khodair, 'Sustained Growth and Anti-Corruption Policies in Egypt', *Journal of Statistics Applications & Probability* 12, no. 3 (2023): 1223–25.
[58] 'About Us', Government Contracting Portal, accessed 28 December 2024, https://etenders.gov.eg/index.php/AboutUs.

٥٩اللجنة الفرعية التنسيقية لمكافحة الفساد، "الاستراتيجية الوطنية لمكافحة الفساد (٢٠١٩-٢٠٢٢)"، ٢٠١٩، https://aca.gov.eg/News/1631.aspx؛

Mohamed Abu Naama, 'Utilizing Technology to Ensure the Success of National Endeavors in Combating Corruption', *Conscience of the Nation*, December 2023, 30.

60 Khalifa and Khodair, 'Sustained Growth and Anti-Corruption Policies in Egypt', *op. cit.*, 1223.

٦١الرقابة الإدارية، "تقرير متابعة تنفيذ الاستراتيجية الوطنية لمكافحة الفساد ٢٠٢٢-٢٠١٩"، ٢٠٢٢، ١٦–١٩، https://aca.gov.eg/Media/News/2022/12/14/2022-638066189703437933-343.pdf.

٦٢المرجع السايق.

٦٣اللجنة الوطنية التنسيقية للوقاية من الفساد ومكافحته، "الاستراتيجية الوطنية لمكافحة الفساد (٢٠٢٣-٢٠٣٠)"، مرجع سبق ذكره، ٣٣.

٦٤المرجع السابق، ٣٦.

65 Tarek Younis, 'USAID Economic Governance Activity (EGA)' (Plenary Session, Annual Conference of the Association for Middle Eastern Public Policy & Administration, The American University in Cairo, 22 December 2024);

الرائد/أيمن طارق و أ/نادين فودة، "منظومة مكافحة الفساد في مصر"، مرجع سبق ذكره.

66 Naama, 'Utilizing Technology to Ensure the Success of National Endeavors in Combating Corruption', *op. cit.*, 30.

67 Marian Kaldas, 'An Interdisciplinary Inventory of Anti-Corruption Solutions: Towards A Better Anti-Corruption Strategy Adapted to Egypt's Context', *op. cit.*, 261–62.

68 'Review of Implementation of the United Nations Convention against Corruption: Arab Republic of Egypt (Chapters II and V)', *op. cit.*, 8.

٦٩عبد الله فيصل علام، "تقييم سياسات مكافحة الفساد فى مصر منذ ٢٠١٤م"، *مجلة كلية الاقتصاد والعلوم السياسية* ٢٣، ٣ (٢٠٢٢): ١٩٨، https://doi.org/10.21608/jpsa.2022.249980.

٧٠نسرين الشرقاوى، "تطور الأداء: تقدم مصر في مؤشر مكافحة الفساد - المركز المصري للفكر والدراسات الاستراتيجية"، ٨ يوليو ٢٠٢٤، https://ecss.com.eg/46737/ .