

National Anti-Corruption Strategy

2014 - 2018



Arab Republic of Egypt



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National Coordinating Sub-Committee for the Prevention of
and Fight against Corruption

National Anti-Corruption Strategy

2014 - 2018

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Introduction

In the shed of the real determination of the Egyptian people and the political will for combating corruption, expressed by 2014 Constitution, highlighting State commitment to fight corruption and competent monitoring entities obligation to coordinate efforts and entrench principles of transparency, integrity and rule of law; believing that corruption is the main impediment hindering efforts targeting the achievement of comprehensive development, adversely impacting all aspects of life, wasting available potentials and obstructing governments capacity to nationally provide basic services for citizens; Egypt has witnessed increasing attention to fight corruption and remarkable development of efforts exerted in this regard, important of which the establishment of National Coordinating Committee for the Prevention of and Fight against Corruption and affiliated sub-committee.

In the light of efforts exerted in administrative and economic fields reform- as main entry points to curbing corruption- and Egypt adoption of United Nations Convention against Corruption (UNCAC) in 2005 and Arab Anti-Corruption Convention in 2014; accompanied with State parties commitments to take preventive procedures to restrict corruption and update legislations to conform with obligations stipulated in the Conventions with regard to criminalized actions, international cooperation, asset recovery and technical assistance fields;

Accordingly, a National Anti-Corruption Strategy has been developed, representing a vision towards promoting administrative performance, preserving public funds and pinpointing a message for everyone affirming integrity, transparency and accountability as priority areas in all fields of work. The Strategy further aims at setting a realistic plan to combat corruption in Egypt, based on available potentials and capacities, in addition to controlling corruption practices in society by setting goals and executive steps, ensuring the confinement of such a phenomenon and adjustment of people behaviors in order to promote performance, thus achieve sustainable development and people welfare.

Notably, it analyzed the strengths and weaknesses, represented in the internal environment, as well as the opportunities and threats, reflected in the external environment, of the anti-corruption system in Egypt. Based on the previously mentioned, a number of themes were determined, representing Strategy general directions. Key goals were identified for every theme, each of which including a set of objectives established to combat the different aspects of the corruption phenomenon.

This document establishes an outline for the National Anti-Corruption Strategy 2014 – 2018. It comprises a variety of principles, important of which: entrenching the principle of accountability without any kind of favoritism or discrimination. Also, it strongly highlights that combating and preventing corruption are common responsibility among all State authorities and society, requiring concerted efforts to achieve required levels of awareness and prevention of corruption phenomenon and deterrence of corrupted people. It further pinpoints citizen right to be updated with such efforts outcomes and participate in combating corruption – being a national duty – to achieve national sustainable development and people welfare.

**National Coordinating Sub-Committee
for the Prevention of and Fight against Corruption**

Strategy Goal

Combat corruption in the Egyptian society through setting objectives, policies, programs and mechanisms that ensure curbing corruption and activating an anti-corruption society culture.

Development of National Anti-Corruption Strategy

The National Anti-Corruption Strategy depended on identifying corruption reasons and setting related goals, policies, programs and mechanisms, enhancing principles of transparency, integrity and accountability without favoritism or discrimination. Combating and preventing corruption are assisted by concerting efforts and assigning roles of all anti-corruption national system parties.

Strategy Foundations

- 1- Observe corruption main characteristics;
- 2- Diagnose accurately corruption issue to identify related reasons;
- 3- Determine points of strength and weakness in work and anti-corruption system in Egypt;
- 4- Identify threats facing and opportunities supporting Egypt anti-corruption work system;
- 5- Define goals and achievability on the short and medium terms;
- 6- Identify policies to be followed to achieve goals and encounter corruption causes;
- 7- Specify required procedures for effective contribution of all anti-corruption concerned bodies, at the top of which monitoring entities, law enforcement agencies and governmental associations as well as Civil Society Organizations (CSOs);

Strategy Mechanisms

- 1- Develop work systems in a way combating corruption;
- 2- Participate effectively with concerned bodies to establish an anti-corruption unified front;
- 3- Activate anti-corruption mechanisms (control of organizational structures/ development of human resources/ application of transparency and integrity principles ...);
- 4- Set short/ medium term goals and achievability of specific goals without contradiction to other goals;
- 5- Provide all (human/ financial) resources to implement strategy;
- 6- Distribute tasks and responsibilities in the light of strategy themes;
- 7- Set alternative mechanisms, when necessary, to achieve required level of flexibility to deal with any changes while implementing strategy;
- 8- Establish national indicators to follow up strategy implementation.

Section One:

Corruption Issue in Egypt

Section One: Corruption Issue in Egypt

1- Definition and Types of Corruption:

a) Definition of Corruption:

There is no sole definition for corruption among researchers. This is attributed to the complex nature and the different dimensions of such a phenomenon. However, there are some definitions widely accepted and used, important of which is the World Bank definition of corruption as “*the abuse of public office for private gain*”. This definition was criticized for restricting corruption to governmental and public sector only.

Accordingly, an international organization defined corruption as “*the abuse of authorized power for private gain*”. This definition widened the scope of corruption to include the private sector, thus became the most accepted internationally.

b) Types of Corruption:

There are different types of corruption, namely administrative, financial and political. These types differ according to the criteria used. There are two criteria selected in this regard. First is the amount of gains received from the corruption crime and the function of the corrupted person. As for the second criterion, it is the nature of sector in which corruption takes place. With reference to the amount of gains received from the corruption crime and the function of the corrupted person, corruption can be divided into **Petty Corruption**, which is carried out by junior staff and officials. Usually the gains of such type of corruption are minimal and often unorganized, the aim of which could be to facilitate cumbersome procedures, yet it could be a reason for complicating procedures as officials tend to set red-tape

obstacles before citizens in order to be provided with bribes. On the other hand, there is also **Grand Corruption**, which is applied by senior staff and officials. The gains of such type of corruption are huge and organized, and often spread in developing and least developed countries that suffer from lack of governing rules and systems.

2- Corruption Phenomenon in Egypt: Internal and External Perspectives:

a) On internal level:

Since 2008, studying corruption phenomenon in Egypt started to gain attention. Studies, researches, public opinion surveys and reports were conducted, at the top of which reports issued by Transparency and Integrity Committee (TIC) at Ministry of State for Administrative Development, report by the Third Session of the Conference of the State Parties to the United Nations Convention against Corruption held in Doha on 9 – 13 November 2009 and the study on cultural frameworks governing Egyptian behaviors and attitudes towards transparency, integrity and anti-corruption values.⁽¹⁾

Other significant studies were further issued. To elaborate, Social Contract Center carried out studies on “The Diagnosis of Egyptian Reality by Studying the Legal and Institutional Framework of Anti-Corruption in Egypt”. Information and Decision Support Center (IDSC) also conducted surveys on “Evaluating Administrative Corruption Degree Geographically in all Governorates and in Governmental Sectors” and “Applying an Indicator for Measuring Administrative Corruption in Egypt and Providing a Vision on How to Expand Measuring People Awareness of Administrative Corruption Phenomenon Deeply.”

Other miscellaneous studies and working papers were also implemented by IDSC on “Enhancing People Access to Justice and Promoting Legal Assistance in the Arab Region” and “Transparency and Community Participation in Setting State Budget.”

Research centers affiliated to Helwan University and civil CSOs had substantial studies too. To enumerate, Egyptian NGO Support Center launched studies on “CSOs Role in Promoting Governmental Organizations Transparency and Accountability”, Development and Institutional Support Center issued “Egyptian Society Awareness of Administrative Corruption Forms and Means of Promoting Transparency and Accountability” and the Egyptian Association for Community Participation Enhancement initiated “Article 13 Alliance for Fighting Corruption”.

In addition to:

A study on “SMEs Work Environment in Egypt and SMEs Relationship with Governmental Administrations” was conducted by Al Ahram Center for Political and Strategic Studies.

A study on “SMEs Established in 2009” was executed by Center for International Private Enterprise (CIPE)⁽²⁾. The study survey results highlighted that nearly half of such enterprises faced serious difficulties when dealing with governmental entities to apply incorporation procedures. Many stated that they had to pay bribes to finalize such procedures.

A study on “Transparency in Governmental Procurements and Projects to Ensure Equitable Competition for SMEs” was also issued by Center for International Private Enterprise (CIPE).

Most of the above mentioned studies focused on analyzing one aspect or more of corruption without holistically tackling the phenomenon.

2- Reports executed by Center for International Private Enterprise (CIPE) in collaboration with Al-Ahram Center for Political and Strategic Studies.

<http://www.ad.gov.eg/Admin/EditorDocs.pdf>

b) On external level:

From 2009 to 2014, numerous studies were made by external organizations, which were interested in measuring corruption phenomenon in Egypt. Nevertheless, these studies reflected an inaccurate image of the corruption reality in Egypt, as a result of the Egyptian Anti-Corruption Agencies (ACAs)'lack of participation in the preparation of such studies.

3- Measuring Corruption in Egypt:

Most of corruption measurement efforts focused on setting standards for perceiving corruption. It is noteworthy that measuring corruption is considered a difficult task, bearing in mind the lack of a comprehensive definition, multiplicity of corruption forms, absence of accurate statistics and shortage in information, hence, measuring corruption in general becomes inaccurate. Despite of the previously mentioned, efforts were exerted to set methods of measurement, most of which targeted financial corruption measurement for being of negative repercussions on Egypt comprehensive economic development. In other words, it adversely impacts foreign investment in Egypt and citizens' confidence in State bodies, thus affecting their productivity. With this in mind, corruption is measured through estimating the illegal gains using one of two methods:

a) First Method:

It uses macroeconomic data and depends on estimating the amount of gains resulting from informal or underground economy ⁽³⁾, as a percentage from official GDP. This informal or underground economy, existing in

3- The informal economy is the diversified set of economic activities that are not regulated or protected by the state. In Egypt, it takes various forms, the most dangerous of which is the manufacturing processes conducted discarding

various developing and other countries, triggers corruption. The economic activity stakeholder may find the registration procedures requiring more papers and costing additional money (transactions high costs) i.e. bribes required, in addition to the legal costs, thus avoids the registration of the economic activity and prefers practicing underground activity.

b) Second Method:

It is used to measure data collected about recorded crimes, for example tax and custom evasion crimes documented by tax authorities and law enforcement agencies. The total tax evasion volume amounted to 61 billion pounds in 2013 (Inspection and Collection Department) of total tax revenues estimated by 366 billion pounds, i.e. 16.7%.⁽⁴⁾

With regard to customs evasion, it amounted to 1.2 billion pounds (in published cases only) in 2013 of total custom duties estimated by 21.546 billion pounds, equivalent to 0.248%, despite of trade balance deficit reaching 220 billion pounds for the same year.⁽⁵⁾

4- Corruption Reasons in Egypt:

The Egyptian society has witnessed, during the last three decades, numerous political, social and economic changes.

One of the most important changes is shifting towards the capital economics model. Similar to all other countries experiences, in this regard, this shift is accompanied with an increase in and unequal distribution of wealth in addition to limited income categories lack of access to development outcomes, thus generating feelings of injustice and indifference resulting in the spread

4- Samer Al Nagar, Mohamed Ali, Corruption Financial Costs in "Analysis of Corruption Cost in Egypt", unpublished study, 2914, Page 38.

5- Samer Al Nagar, Mohamed Ali, Corruption Financial Costs in "Analysis of Corruption Cost in Egypt", unpublished study, 2914, Page 36.

<http://www.mof.gov.eg/Arabic/عناوين/20%رئيسية/PE/Pages/budget1415-.aspx>

of corruption, the reasons of which in the Egyptian society are as follows:

a) Economic Reasons:

(1) Decrease and disparity in income rates:

Some of the international standards used to measure poverty and fair distribution of income highlighted the low level of income. One of the most important previously mentioned standards is Gini Coefficient, ⁽⁶⁾ which recorded in 2011 about 32.1% in Egypt, reflecting a state of inequality compared to 36% in 2009. It further decreased in 2012 to reach 28% as a result of the 2.2% reduction growth rate and the increase in unemployment rate.

Lack of social justice and unequal distribution of income and wealth, being part of the economic and social scene, have led to a decrease and disparity in income levels. Moreover, wealth was controlled by a category that is more capable of exploiting opaque activities in Egypt. Therefore, a huge category of citizens were incapable of fulfilling their basic needs of goods and services, the matter leading some to resort to corrupted practices as a means to fulfill their such needs.

The most important reasons for the decrease and disparity of incomes and purchasing power are as follows:

- (a) Low wages and salaries in many sectors in State administrative body, especially in service provision units;
- (b) Adoption of monopolistic practices by some individuals and companies, which led to an increase in the prices of various goods and services, particularly the strategic ones, without economic reasons;

6- Gini index measures the extent to which the distribution of income or consumption expenditure among individuals or households within an economy deviates from a perfectly equal distribution. A "Lorenz" curve plots the cumulative percentages of total income received against the cumulative number of recipients, starting with the poorest individual or household. The Gini index measures the area between the "Lorenz" curve and a "hypothetical" line of absolute

- (c) Steady increase in inflation rates thus affecting the rise in goods and services prices and the decrease in money purchasing value, assimilating any increases in incomes and adversely affecting the actual value of money;
- (d) Encouragement of consumption culture, which resulted in consumption rates inequitable and insufficient with income rates to satisfy people needs without any adequate awareness.

(2) Government overspending:

Despite of the continuous State confirmations and government efforts to control State administrative body spending, with regard to public procurement, overspending is still practiced by the administrative body, thus wrongly-directing State resources and resulting in negative impacts, important of which:

- (a) Deducting a significant part of State resources that should have been been directed to other government spending fields for citizens' public benefit against personal interests of administrative body officials, for example overspending on cars, preparations and office furniture;
- (b) Decreasing public spending on development projects, thus affecting the per capita income and fulfillment of basic needs, hence leading to an increase in corruption rate.

(3) Expanding establishment of special funds:

The special funds are a range of financial charges imposed on citizens and deposited in funds affiliated to several bodies and excluded from the State budget. Therefore, these funds details are not presented to Parliament, though they should be subject to the inspection of Central Auditing Organization (CAO). Pursuant to relevant laws, the establishment of such funds is not restricted to the president power only, but extend also to include governors' and heads' of directorates and villages. This has led to massive expansion in the establishment of such funds and the difficulty

of such funds and the difficulty of being enumerated; providing a suitable environment for related corruption crimes.

b) Administrative Reasons:

There are numerous weak points in the public administration systems in Egypt, which had a significant role in the prevalence and penetration of corruption and ineffectiveness of corruption uprooting procedures. The most important reasons for the aforementioned are highlighted as follows:

(1) Poor organizational structures of State governmental and administrative body:

The organizational structures of State governmental and administrative body suffer from several problems, important of which:

- (a) Lack of periodical revision and updates, thus unfulfilling citizens' aspirations with regard to governmental services;
- (b) Overlapping of jurisdictions between governmental entities, leading to conflicts obstructing government work, hindering people interests and weakening accountability;
- (c) Inaccurate identification of responsibilities within each entity, which result in scattered responsibility; impeding and leading to ineffective internal control mechanisms, increasing officials' denial of responsibility and usually holding junior staff accountable.

(2) Government bureaucracy and complicated procedures:

Governmental services suffer from numerous bureaucratic problems and complicated procedures that largely contribute in creating an adequate atmosphere for corruption crimes, namely the heavily burdened employees in service provision outlets and the crowded citizens seeking services. The most significant problems in this regard are:

- specific timing for fulfillment;
- (b) Lack of sufficient powers for employees to show flexibility toward some complicated procedures;
 - (c) Ill treatment of people by employees and the tendency to complicate procedures without any related control;
 - (d) Lack of sufficient means to familiarize citizens to required service provision procedures in advance;
 - (e) Lack of clear and effective means of communication between service recipients and senior officials of service units to solve arising problems, in addition to nominal actions taken to investigate poor service performance complaints;
 - (f) Inadequacy of service provision places, with regard to locations, facilities or waiting areas;
 - (g) Lack of technological means in service provision, in some outlets, and depending mainly on human elements.

(3) Poor governmental entities internal control:

Poor and ineffective internal control over governmental entities increases the spread of corruption practices. This ineffectiveness is reflected as follows:

- (a) Lack of consideration to the conflict of interests regarding the official presented by internal control reports in some State administrative body units;
- (b) Poor central control over administrative body subsidiary units, including ensuring effective internal control in such units;
- (c) Lack of periodical effective mechanism to investigate employees' commitment to work code of conduct;
- (d) Lack of effective, deterrent and prompt penalties in cases of violations, thus entrenching the culture of complacency and corruption in the administrative sector;

- (e) Poor financial allocations for training processes and lack of related controls to ensure being soundly directed, accordingly leading to cases of manipulation;
- (f) Lack of rules, in internal control systems, for employees to report corruption practices.

(4) Recruitment, evaluation and promotion systems in civil service:

The poor recruitment, evaluation and promotion systems in addition to depending, in many cases, on appointing employees children or applying favoritism have led to crowding the governmental entities with undesired employees, looseness of the governmental structure and establishing numerous unjustified functional degrees and administrative levels, thus seriously complicating governmental procedures.

(5) Salaries and wages systems:

The poor salaries and wages systems in the State administrative body created an adequate atmosphere for the spread of corruption, including bribery, profiteering and taking hold of public funds. The most remarkable shortcomings are pinpointed below:

- (a) Unfair distribution of salaries among State administrative body employees;
- (b) Lack of connection between variable wages and actual performance. Despite of the fact that the majority of wages and salaries are variable, many bodies provide all employees with equal variable wages regardless of performance and economic conditions considerations.

(6) Poor administrative skills:

It is worth mentioning that lack of adequate administrative skills, of people responsible for managing some governmental entities, results

c) Legal Reasons:

(1) Poor protection of witnesses, experts, victims and reporters:

There is no comprehensive legislation regulating issues related to the protection of witnesses, experts, victims and reporters.

(2) Long legal and judicial procedures:

Investigation and judicial procedures in corruption crimes lasts for a relatively long period, thus weakens the legal deterrent power towards corrupted people and provides opportunities for the accused to escape abroad prior to trial. It also may lead to losing or destroying evidences, affecting witnesses or making no use of witnesses for travelling or death reasons. This accordingly entrenches feelings of legal and judicial procedures infeasibility to combat corruption in Egypt; delaying restoration of rights and recovery of funds.

(3) Slackening in executing punishments issued in corruption crimes and determining weak punishments for some of such crimes:

Slackening in the execution of judgments issued in corruption crimes led to unfulfilling the deterrent factor required in such cases. Moreover, punishments determined for some corruption crimes, related to public funds, are considered weak. For instance, smuggling subsidized goods has increased as a result of the weak punishments.

(4) Multiplicity and overlapping of laws and regulations governing governmental entities work:

Governmental entities work is governed by various laws, regulations and decisions, hence resulting in gaps, when being applied, including:

- (a) Confusion of employees concerning the current regulations to be applied in governmental work; favoring regulations fulfilling

personal interests, whether having good or ill intentions, the matter enhancing corruption practices;

- (b) Increase in bureaucratic practices as employees apply more than one regulation governing the same procedures, which opens way to more corruption practices;
- (c) Difficulty faced by regular citizen to understand laws and regulations as well as resulting procedures, accordingly is directed by the concerned employee, which leads to corruption practices such as bribery ... etc;
Issuance of numerous regulations for public enterprise companies,
- (d) the funds of which are considered public funds, identifying the legal administration jurisdiction to investigate financial violations, contrary to the generally established rules stipulated in enforced laws. In case of issuing such regulations by virtue of ministerial decrees –being much lesser in power than laws- and expanding the establishment of internal disciplinary councils, which by default are subject to the body management control, these practices result in concealing some of the financial violations as well as providing no protection for employees against the management intransigence.

d) Lack of adequate transparency:

Combating corruption and reducing related negative impacts necessitate the provision of accurate and updated information and data. These information and data should further be accessible and circulated among people, except if considered confidential, uncirculated or contradictory to national security. Despite of Egypt ratification of the International Covenant on Civil and Political Rights (ICCPR), International Covenant on Economic, Social and Cultural Rights (ICESCR) (1966), United Nations Convention against Corruption (UNCAC) and the provisions of Article 68 of 2014 Constitution, there are numerous problems with reference to access to information. Some of UNCAC articles provided for access to information on public affairs

expenses paid against information, if any, and provision of information in a reasonable time.

e) Institutional arrangements reasons:

Despite of the multiple control bodies concerned with combating corruption in Egypt, there are some obstacles hindering effective execution of entrusted roles and coordination efforts. The most important obstacles are:

(1) Challenges facing some external control bodies:

- (a) Procedural restrictions on investigating with senior officials in State administrative body;
- (b) Abuse of administrative discretion power in a way contradicting with the controlling body opinion and suppressing Anti-Corruption Agencies' (ACAs) efforts;
- (c) Lack of sufficient impunity for control bodies members to carry out their roles;
- (d) Lack of financial and human resources in some control bodies;
- (e) Non disclosure of reasons, by some investigation authorities, concerning some of the reports referred by control bodies.

(2) Some anti-corruption control bodies in Egypt are subordinates to the executive authority, hence affecting their independence.

(3) Limited coordination between control bodies:

Coordination mechanisms between control bodies are limited and resorting to modern technological systems is not used to assist in facilitating consultation and exchange of information concerning investigations.

(4) Citizens' lack of sufficient awareness on ACAs in Egypt:

- (a) Despite of the multiple control bodies existing in Egypt, they are

unknown to the majority of people. In the shed of the lack of some people awareness, many people when exposed to certain violation, or even when sought to scheme against someone, are used to send dozens of complaints to all competent and non-competent authorities, from the Presidency to the relevant District authority. This has led to accumulation of complaints before all control bodies; weakening the complaining mechanism and the role it could play in combating corruption.

(b) Lack of control bodies definition and their roles to the people.

f) Social Reasons:

The overwhelming of transparency, integrity and honesty values in societies is considered one of the protection means against corruption crimes prevalence. However, the Egyptian society recently has been suffering from several social issues that adversely impacted such values, which are as follows:

(1) Decline in values and attitudes:

This obviously appears in the spread of negative behavioral characteristics resulting from various consecutive economic and political circumstances.

(2) Poor confidence in successive governments:

Previous systems negative practices, such as poor transparency, lack of serious procedures taken towards monopolistic practices, spread of corruption in several governmental associations, absence of accountability and disrespect of law, have led to losing confidence in successive governments and some people acceptance to corruption as a prompt means, from their point of view, to obtain their rights.

(3) Resorting to favoritism and community irresponsibility:

by resorting to favoritism. Also, people, particularly capable ones, refrain from participating in society to prevent and combat corruption, feeling the infeasibility of their participation.

(4) Social acceptance of petty corruption:

The above mentioned reasons led to the appearance of a new corruption tolerant culture, showing corruption as a socially accepted means to receive rights.

g) Other Reasons:

- (1) Poor role of different media means in raising people awareness of corruption issue elements, namely corruption elements, reasons, impacts and means of treatment, exerting insufficient efforts to promote ethical values and entrench transparency, integrity and accountability principles to curb such a phenomenon;
- (2) Lack of civil society organizations participation in defining and raising awareness of corruption issue, and poor practice of accountability in anti-corruption field;
- (3) People abstention from reporting corruption incidents for being afraid of hindering their interests or being exposed to avenging reactions.

Section Two:

Outline of Anti-Corruption Strategy

Section Two: Outline of Anti-Corruption Strategy

This Section tackles the principles, on which the strategy is based, together with method of preparation, term and participating bodies. It further highlights the points of strength and weakness in the Egyptian work and anti-corruption system in order to set main, subsidiary, specific and clear functions and goals as well as effective implementation mechanisms.

1- Strategy Principles:

The achievement of strategy goals depends on the following principles:

- a) Rule of law and separation of State powers;
- b) Political commitment and will, including the three State authorities, namely legislative, executive and judicial, being aware of corruption free society significance and working together to ensure the implementation of current strategy;
- c) Full commitment to cooperation and coordination between stakeholders, government, public sector and civil society, in a way ensuring the unity and harmony in implementing anti-corruption policies;
- d) Government application of good governance practices by following principles of transparency, integrity, efficiency, effectiveness, accountability and setting clear and effective procedures to achieve established goals, which are characterized by being capable of and flexible in responding to social needs;
- e) Respect of human rights and equality between all citizens before law;
- f) Significance of accountability, according to which State authorities should be responsible of carrying out obligations related to strategy and plan implementation and ensuring their effectiveness;
- g) Prevention and early interference, according to which corruption incidents will be restricted and eliminated in a timely manner;

- h) Effectiveness in combating corruption, based on continuous monitoring and evaluation of anti-corruption efforts aiming at restricting corruption practices in a timely manner and taking adequate handling procedures;
- i) Priority for public interest, as institutions and public authorities representatives should pay due concern to public interest when carrying out their duties and avoid any behavior that may harm public interest and funds;
Transparency and public-private partnerships, taking in consideration the
- j) importance of civil society and business councils' cooperation in tangible and actual activities in order to prevent corruption.

2- Strategy Term:

The strategy term is 4 years starting in December 2014 until the end of December 2018.

3- Entities Participating in Execution:

Undoubtedly, the achievement of proposed goals and policies to combat and restrict the impacts of corruption require strenuous efforts from all anti-corruption system stakeholders. It also necessitates the implementation of such efforts in an integrated framework so as to be more capable of encountering different challenges, which may prevent its success.

Taking in consideration the aforementioned, the importance of the National Coordinating Committee for the Prevention of and Fight against Corruption is reflected, as it carries related effective roles, significant of which the crystallization of strategy as a national objective before society, specification of all anti-corruption system elements roles and preparation of a harmonized mechanism to execute such roles, including inter alia clear tasks and responsibilities of concerned participants. During the preparation of strategy, all stakeholders'

- a) National Coordinating Committee for the Prevention of and Fight against Corruption and affiliated sub-committee.
- b) Parliament and local councils in different governorates.
- c) Government (Ministries/ associations/ affiliated bodies) and Public Enterprise Sector Units.
- d) Corruption combating and prevention bodies and law enforcement agencies.
- e) Monitoring authorities in financial institutions, banking system and non-banking financial institutions (Egyptian Central Bank/ Egyptian Financial Supervisory Authority).
- f) National councils, universities and specialized research institutes.
- g) Media means and press institutions.
- h) Civil society organizations.
- i) Islamic and Christian religious institutions.

4- SWOT Analysis (Strengths, Weaknesses, Opportunities and Threats of anti-corruption work system in Egypt):

Believing in combating corruption in Egypt and fulfilling the international commitments in this regard, such a strategy was designed using SWOT analysis method, which remarkably assists in achieving desired goals. SWOT analysis is made of two parts, namely analysis of internal conditions (strengths and weaknesses) concerned with analyzing the actual current situation and points of strength and weakness, while the other part is the analysis of external environment (opportunities and threats) that considers the current situation of regional and international threats and available opportunities from one side and analysis of related potential change from another side.



Diagram (1): Elements of SWOT Analysis

The previously mentioned analysis elements are detailed as follows:

a) Strengths:

- (1) Existence of political will determined to eliminate corruption;
- (2) Egyptian people awareness of corruption risks on their living standards;
- (3) Abundant Egyptian legislative environment with numerous laws supporting anti-corruption efforts, in addition to enhancing such efforts by enacting new set of legislations in different fields (money laundering, consumer protection, preventing monopoly, protecting intellectual property rights, prohibiting State officials conflict of interests ... etc.);
- (4) Provision of required institutional structure to implement the anti-corruption strategy represented in (Parliament, Administrative Control Authority, Accountability State Authority, Financial Supervisory Authority, General Administration of Public Funds Investigation Department affiliated to Ministry of Interior, Anti Money Laundering Unit, Illicit Gains Authority affiliated to Ministry of Justice, Public Prosecution, and Administrative Prosecution Authority (APA) ... etc.);
- (5) Majority of Egyptians confidence in the judicial integrity and neutrality of issued judgments;
- (6) Provision of different media means forms, especially modern technological means, which assist in the spread of awareness raising campaigns;
- (7) State pursuit of administrative reform by prioritizing legislative and

following a program to simplify governmental procedures with regard to services provided for citizens, separating service provider from recipient and offering some services electronically.

b) Weaknesses:

- (1) Lack of effective coordination between Anti-Corruption Agencies (ACAs), contradiction in steps applied and autocracy of some bodies in taking some actions;
- (2) Poor coverage of all forms of corruption crimes in Egyptian laws, as stipulated in United Nations Convention against Corruption (UNCAC);
- (3) Subordination of some Anti-Corruption Agencies (ACAs) to the executive authority, which restricts the required independence;
- (4) Coupling some people wealth with authority;
- (5) Exaggeration in propagating corruption incidents, without reference to any positive points, or disseminating data lacking sufficient evidences;
- (6) Slackening judicial procedures in some cases, resulting in the delay of required deterrent elements;
- (7) Expansion of State administrative body, leading generally to reduction in wages rates in a way inappropriate with the increase in prices, thus affecting the fulfillment of basic needs;
- (8) Significant disparity in wages and salaries among people of the same functional degree in State administrative body and public enterprise sector;
- (9) Ineffective control elements and poor financial and training potentials in some control entities of State administrative body and public enterprise sector;
- (10) Complicated procedures in the majority of governmental entities;
- (11) Administrative and organizational obstacles hindering asset recovery of corruption crimes;
- (12) Numerous laws, regulations and decisions leading to contradiction and discrepancy in required procedures.

c) Opportunities:

- (1) Existence of an anti-corruption supporting environment;
- (2) Egypt ratification of UNCAC and Arab Anti-Corruption Convention;
- (3) Increase in modern technologies, which contribute in rapid exchange of information in anti-corruption field regionally and internationally;
- (4) Growing international competition to attract companies and investors encourage opportunities for anti-corruption enhancement;
- (5) Making use of the best successful international practices in corruption combating and prevention field.

d) Threats:

- (1) Long and complicated procedures for handing criminals accused in corruption crimes;
- (2) Egypt lagging behind in international anti-corruption indicators ranking; this weakens opportunities for external investment;
- (3) Administrative and organizational obstacles in international cooperation efforts to combat corruption crimes and recovery of related assets;
- (4) Using financial returns gained from some corrupted practices in money laundering and financing terrorism.

Section Three:

Strategic Route

Section Three: Strategic Route

1- Vision:

Establish a society concerned with combating corruption and restoring the culture of transparency, integrity, justice and devotion, supported by effective administrative bodies.

2- Mission:

Combat corruption, reduce related impacts on all administrative, economic, political and social levels, raise awareness of such impacts, promote Anti-Corruption Agencies (ACAs) capacities, cooperate with all local, regional and international concerned bodies in combating related crimes while taking in consideration international standards and best practices.

3- Main Goals of National Anti-Corruption Strategy:

The National Anti-Corruption Strategy is based on a number of main goals and emerging objectives. This endeavor paves the way for designing the action plan, which includes the executive procedures to be taken by concerned bodies. These goals are enumerated as follows:

- (a) Enhance State administrative and governmental body level of performance and improve services provided for people;
- (b) Entrench transparency and integrity principles in staff and State administrative body;
- (c) Enact and update legislations supporting anti-corruption efforts;
- (d) Develop judicial procedures to achieve prompt justice;
- (e) Support Anti-Corruption Agencies (ACAs)

- (g) Raise people awareness of corruption danger, significance of anti-corruption efforts and build people confidence in State institutions;
- (h) Boost local cooperation in anti-corruption field;
- (i) Enhance regional and international cooperation in anti-corruption field;
- (j) Involve civil society organizations in anti-corruption efforts.

Executive Plan of National Anti-Corruption Strategy

Executive Plan of National Anti-Corruption Strategy

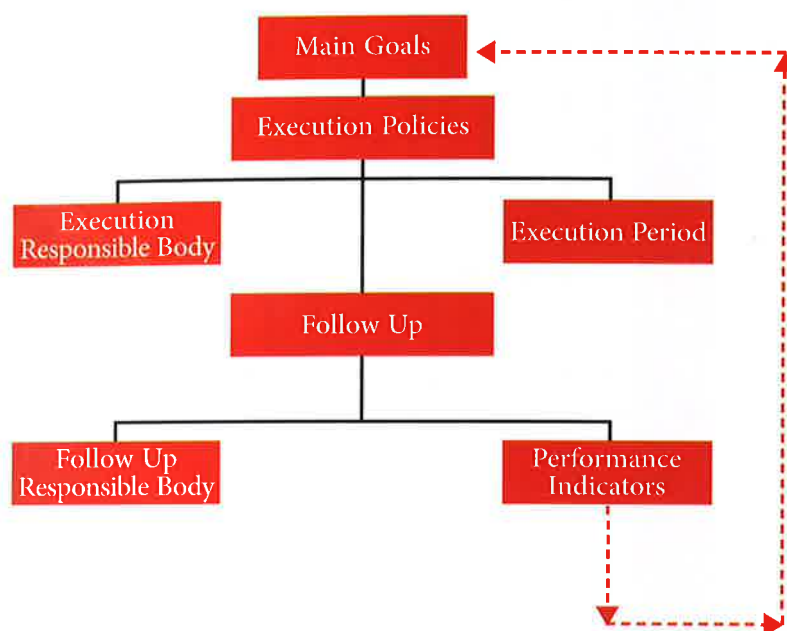


Diagram (2): Executive Plan of National Anti-Corruption Strategy

Remark:

National Coordinating Committee for the Prevention of and Fight against Corruption and affiliated sub-committee will be assigned to prepare detailed mechanisms to implement the strategic goals annually, in accordance with the priorities and available financial resources during the plan execution period 2014/ 2018.

Main Executive Plan for National Anti-Corruption Strategy

Main Goals	Execution Policies	Execution Responsible Body	Execution Period	Follow up Responsible Body	Performance Indicators
Enhance State administrative and governmental body level of performance and improve services provided for people.	<ul style="list-style-type: none"> • Adjust and update organizational structures; • Support internal control; • Reform recruitment, evaluation and promotion systems; • Reform salaries and wages structures; • Provide training for all administrative levels staff; • Simplify and automate administrative procedures for people; • Activate exchange of information between governmental entities electronically. 	<ul style="list-style-type: none"> - Cabinet of Ministers. - Ministry of Planning, Follow up and Administrative Reform. - Ministry of Finance. - Accountability State Authority. - Central Agency for Organization and Administration. 	Medium (2015 – 2016)	<ul style="list-style-type: none"> - Parliament. - National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. - Civil Society Organizations. - Newspaper agencies and media means. 	<ul style="list-style-type: none"> - Provision of an adjusted wages schedule. - Provision of an updated and applied organizational structures. - Issuance of a new law for civil servants. - Increase of financial allocations for the training of State governmental body staff. - Provision of follow up reports prepared by National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. - Provision of opinion surveys and questionnaires.

No.	Main Goals	Execution Policies	Execution Responsible Body	Execution Period	Follow up Responsible Body	Performance Indicators
2	Entrench transparency and integrity principles in staff and State administrative body.	<ul style="list-style-type: none"> • Activate staff code of conducts; • Activate law on prevention of civil servants conflict of interests and automate financial disclosure statements; • Provide information and data on State administrative body works without contradiction to national security and people personal data confidentiality; • Provide control bodies reports by virtue of 2014 Constitution and regulating laws; • Raise awareness of control bodies and related jurisdictions in corruption combating and prevention fields; • Publish State budget in a simplified form; • Design an electronic website for and connect between all governmental entities; • Combat corrupted practices in different governmental sectors and control government spending. 	<ul style="list-style-type: none"> - Cabinet of Ministers. - Ministry of Planning, Follow up and Administrative Reform. - Internal control bodies. - Accountability State Authority. - Central Agency for Organization and Administration. 	Short (During 2015)	<ul style="list-style-type: none"> - Parliament. - National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. - Civil Society Organizations. - Newspaper agencies and media means. 	<ul style="list-style-type: none"> - Connection between staff incentives and commitment to code of conduct. - Provision of systems to automate financial disclosure statements of State administrative body staff. - Issuance of availability and freedom of information law. - Provision of updated electronic sites for State administrative body. - Amendment of tendering and bidding law. - Provision of follow up reports prepared by National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. - Provision of opinion surveys and questionnaires.

Main Goals	Execution Policies	Execution Responsible Body	Execution Period	Follow up Responsible Body	Performance Indicators
Enact and update legislations supporting anti-corruption efforts.	<ul style="list-style-type: none"> Update and develop anti-corruption legislations to ensure sufficiency and consistency with 2014 Constitution and international conventions and agreements, including for instance: <ul style="list-style-type: none"> Enacting law for protecting witnesses, reporters, victims and experts. Enacting law for availability and free flow of information, amending tendering and bidding law. Updating legislations regulating anti-corruption work and independence. Updating legislations regulating special funds. Developing laws and regulations governing the work of governmental entities. 	<ul style="list-style-type: none"> Parliament. Cabinet of Ministers. Ministry of Planning, Follow up and Administrative Reform. Ministry of Justice. Ministry of Foreign Affairs. National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Anti-Corruption Agencies (ACAs). 	Medium (2015 – 2016)	<ul style="list-style-type: none"> National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Civil Society Organizations. Newspaper agencies and media means. 	<ul style="list-style-type: none"> Issuance of modern laws for corruption combating and prevention. Issuance of laws and regulations governing the work of governmental entities. Provision of follow up reports prepared by National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee.
Develop judicial procedures to achieve prompt justice.	<ul style="list-style-type: none"> Develop work systems in courts and investigation bodies and provide required financial and technical assistance; Enhance capacities of judicial rulings implementation units to achieve the rule of law principle; Establish courts specialized for corruption crimes. 	<ul style="list-style-type: none"> Cabinet of Ministers. Ministry of Justice. Ministry of Interior. Public Prosecution. Administrative Prosecution Authority. State Council. State Lawsuit Authority. 	Medium (2015 – 2016)	<ul style="list-style-type: none"> Parliament. National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Civil Society Organizations. Newspaper agencies and media means. 	<ul style="list-style-type: none"> Rates of promptness according to implementation statistics. Achievement of judicial work automation. Establishment of specialized courts for corruption crimes. Provision of follow up reports prepared by National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Opinion survey on judicial procedures simplification.

No.	Main Goals	Execution Policies	Execution Responsible Body	Execution Period	Follow up Responsible Body	Performance Indicators
5	Support Anti-Corruption Agencies (ACAs).	<ul style="list-style-type: none"> Develop control bodies structures in line with each body nature of work; Provide financial and technical support for control body; Enhance control bodies independence. 	<ul style="list-style-type: none"> Cabinet of Ministers. Ministry of Planning, Follow up and Administrative Reform. Ministry of Finance. Central Agency for Organization and Administration. Anti-Corruption control bodies. 	Medium (2015 – 2016)	<ul style="list-style-type: none"> Parliament. National Coordinating Committee for the Prevention of Corruption and Fight against sub-committee. 	<ul style="list-style-type: none"> Existence of updated and approved organizational structures for control bodies. Increase of financial allocations for control bodies. Issuance of new laws and regulations organizing control bodies works according to 2014 Constitution. Provision of follow up reports prepared by National Coordinating Committee for the Prevention of Corruption and Fight against Corruption and sub-committee.
6	Promote people standards of living and accomplish social justice.	<ul style="list-style-type: none"> Raise income levels and achieve fair distribution of incomes; Control governmental spending to support development projects; Increase the financing provided for SMEs; Alleviate burdens of limited income bracket; Achieve fair taxation and reduce tax and custom evasion. 	<ul style="list-style-type: none"> Cabinet of Ministers. Ministry of Planning, Follow up and Administration Reform. Ministry of Finance. Ministry of Investment. Accountability State Authority. Central Agency for Organization and Administration. Social Development Fund. 	Medium (2015 – 2016)	<ul style="list-style-type: none"> Parliament. National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Civil Society Organizations. Newspaper agencies and media means. 	<ul style="list-style-type: none"> Increase of financial allocations for investment and developmental projects in 2015/ 2016 and 2016/ 2017 budgets. Increase in SMEs entrepreneurs. Increase in tax revenues and follow up reports on the rate of tax and custom evasion. Provision of follow up reports prepared by National Coordinating Committee for the Prevention of Corruption and Fight against Corruption and sub-committee. Provision of opinion surveys and questionnaires.

Main Goals	Execution Policies	Execution Responsible Body	Execution Period	Follow up Responsible Body	Performance Indicators
Raise people awareness of corruption danger, significance of anti-corruption efforts and build people confidence in State institutions.	<ul style="list-style-type: none"> • Entrench religious values and positive attitudes; • Raise public awareness of corruption danger and enhance people role in control practices; • Activate media means role in combating corruption; • Promote confidence in State institutions. 	<ul style="list-style-type: none"> - Cabinet of Ministers. - Ministry of Planning, Follow up and Administrative Reform. - Internal control bodies in different ministries. - National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. - Civil Society Organizations. - Newspaper agencies and media means. - Educational and religious institutions. 	Medium (2015 – 2016)	<ul style="list-style-type: none"> - Parliament. - National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. - Civil Society Organizations. - Newspaper agencies and media means. 	<ul style="list-style-type: none"> - Existence of educational and awareness raising programs of corruption dangers. - Increase in anti-corruption community initiatives. - Provision of follow up reports prepared by National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. - Provision of opinion surveys and questionnaires.
Boost local cooperation in anti-corruption field.	<ul style="list-style-type: none"> • Develop legislations and regulating frameworks to exchange information between Anti-Corruption Agencies (ACAs); • Design new mechanisms for coordination and exchange of information between Anti-Corruption Agencies (ACAs). 	<ul style="list-style-type: none"> - Parliament. - Cabinet of Ministers. - National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. 	Short (During 2015)	<ul style="list-style-type: none"> - National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. 	<ul style="list-style-type: none"> - Existence of data and information exchange systems between Anti-Corruption Agencies (ACAs). - Provision of follow up reports prepared by National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee.

No.	Main Goals	Execution Policies	Execution Responsible Body	Execution Period	Follow up Responsible Body	Performance Indicators
9	Enhance regional and international cooperation in anti-corruption field.	<ul style="list-style-type: none"> Enhance efforts exerted to develop regional and international cooperation in corruption combating and asset recovery fields and required issuance of legislations and ratification of conventions; Maximize Egypt representation in regional and international events on corruption combating and prevention field; Activate items stipulated in ratified conventions on corruption combating and prevention field; Make use of the best international practices in corruption combating and prevention field. 	<ul style="list-style-type: none"> Parliament. Cabinet of Ministers. National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Ministry of Foreign Affairs. Ministry of Justice. Public Prosecution. Anti-corruption control bodies. 	Short (During 2015)	<ul style="list-style-type: none"> National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. 	<ul style="list-style-type: none"> Convening of training courses on corruption combating and prevention field as well as asset recovery. Numerous initiatives between national, regional and international bodies in corruption combating and prevention, money laundering and asset recovery fields. Development of bilateral agreements for the flow of information between law enforcement agencies. Provision of follow up reports prepared by National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee.

Main Goals	Execution Policies	Execution Responsible Body	Execution Period	Follow up Responsible Body	Performance Indicators
Involve civil society organizations in anti-corruption efforts.	<ul style="list-style-type: none"> Review and design legal frameworks for NGOs establishment and work; Encourage CSOs to combat corruption and prioritize related efforts; Facilitate CSOs access to available information without contradiction to national security or public interests, establish channels of communication connecting CSOs with the administrative body and State control bodies; Organize dissemination of information by CSOs, and develop frameworks protecting the objectivity and accuracy of published information. 	<ul style="list-style-type: none"> Parliament. Cabinet of Ministers. Ministry of Planning, Follow up and Administrative Reform. Ministry of Social Solidarity. Internal control bodies in different ministries. National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Accountability State Authority. Central Agency for Organization and Administration. Newspaper agencies and audio-visual media means. Civil Society Organizations. 	Medium (2015 – 2017)	<ul style="list-style-type: none"> National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Newspaper agencies and audio-visual media means. 	<ul style="list-style-type: none"> Issuance of a new law for NGOs. Increase in anti-corruption initiatives. Existence of electronic forums to support governmental communication with CSOs. Inclusion of anti-corruption topics in CSOs programs and works. Provision of follow up reports prepared by National Coordinating Committee for the Prevention of and Fight against Corruption and sub-committee. Provision of opinion surveys and questionnaires.

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