



# How Effective Are Arab Anticorruption Agencies? Is the Glass Half Empty or Half Full?

*Robert Beschel, Oumeyma Chelbi & Isaac Schaider*



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COVER IMAGE: Jordanian protesters hold bread loaves with a slogan in Arabic reading, "corruption = hunger" during an anti-austerity rally, on June 6, 2018, in front of the Labor Union offices in Amman. (Photo by AHMAD GHARABLI / AFP)

## ABSTRACT

Corruption has been a persistent driver of discontent across the Middle East and North Africa (MENA) region, prompting states to establish or restructure specialized anticorruption agencies. Yet, policy and academic debates surrounding the efficacy of such agencies remain nascent.

This study addresses this gap by assessing the effectiveness of anticorruption agencies in the MENA region. Drawing on data from annual reports covering operations, budgets, and staffing, it assesses the performance of anticorruption agencies of seven MENA countries (Jordan, Iraq, Kuwait, Morocco, Oman, Palestine, and Saudi Arabia), benchmarking them against seven global comparators (Hong Kong, Indonesia, Latvia, Malaysia, Romania, Singapore, and Sri Lanka).

The analysis reveals that over the past decade, MENA countries made incremental progress in areas such as anticorruption legislation, asset recovery, and the engagement of civil society organizations. It further underscores the performance gains achieved by these agencies which have helped raise public awareness and foster public trust.

However, significant challenges remain, notably the lack of financial and human resources, agency independence, as well as the need for improved transparency in reporting.

## KEYWORDS

Corruption

Anticorruption

Transparency

Accountability

Integrity

Public Awareness

Bureaucracy

Asset recovery

Rule of Law

Maladministration

Embezzlement

Bribery

Concerns about corruption have been at the center of public dissatisfaction over the quality of governance in many Arab countries. Anger over bureaucratic indifference and malfeasance was one of the main drivers behind the Arab Spring in 2010 and 2011. In 2019, corruption concerns animated the unrest in Lebanon, Iraq and Sudan. Polling data from the Arab Barometer in 2021 reveals that a large majority of citizens—ranging from 89 percent in Tunisia and Lebanon to 61 percent in Morocco—believe that corruption is prevalent in state agencies to a large or medium extent.<sup>1</sup> Fewer believe that governments in the Middle East and North Africa (MENA) region are effectively combating it, and these numbers are steadily declining in many countries.<sup>2</sup>

Following the experience of East Asia, where governments such as Hong Kong and Singapore managed to make significant progress in the struggle against corruption over the past decades, many countries in MENA have opted to create special agencies to combat corruption. In 2003, the United Nations Convention Against Corruption (UNCAC) embraced the notion of a dedicated anticorruption body in Article 6, along with providing such bodies with the necessary independence to conduct their functions effectively.<sup>3</sup> Iraq's Commission on Integrity was established in 2004 by the Coalition Provisional Authority and then enshrined within Iraq's constitution in 2005. Palestine and Jordan established apex anticorruption agencies in 2005 and 2006, respectively. In the wake of the Arab Spring protests, several governments moved to address popular concerns about corruption by creating or upgrading such agencies, including Palestine's rebranded Anticorruption Commission (2011); Saudi Arabia's Oversight and Anticorruption Authority, Nazaha (2011); Kuwait's Anticorruption Authority (2016); and Morocco's National Anticorruption Commission (2017). Other countries have relied upon traditional institutions to combat corruption, including the Administrative Control Authority (ACA) in Egypt or the State Audit Institution (SAI) in Oman.

This paper examines the performance of these agencies in the struggle against corruption, benchmarking them against high-performing agencies in wealthy countries such as Hong Kong, Latvia, Romania and Singapore. It also includes upper middle-income countries such as Malaysia and lower middle-income countries such as Indonesia and Sri Lanka. While experience varies significantly by country, this paper argues that many of these new MENA agencies have made solid, if incremental, progress over the past decade, gaining citizen trust and steadily improving their operations. The anti-corruption bodies are often under-resourced and, in some cases, underperforming, leaving much work still to be done. But in many MENA countries, a solid framework has been laid that reformers can build upon and improve.

### **The Role and Functioning of Apex Anticorruption Agencies**

Consistent with global practice, many of the anticorruption agencies in MENA serve a range of functions that can be loosely grouped under the headings of investigation, prevention, and public awareness. At their core is the examination of allegations of corruption, ranging from bribery and embezzlement to nepotism and maladministration. They are tasked with receiving complaints, investigating their merits, and (where appropriate) recommending cases for prosecution or administrative sanction. These agencies may also play a preventive role, reviewing government regulations, systems and procedures and making recommendations to eliminate corruption-related risks and vulnerabilities. They can develop codes of conduct and monitor income and asset declarations. They also engage the public through various educational efforts that raise awareness about what constitutes corruption and encourage citizens to come forward with complaints. Beyond these elements, the agencies can play an important role in asset recovery, combating money laundering, and interfacing with global efforts to fight financial crime.

As the history of Jordan's Integrity and Anticorruption Commission (JIACC) indicates, these entities were often not created entirely from scratch. Their mission and authorizing legislation have evolved over time and, in some cases, are still evolving. Jordan signed the UNCAC Treaty in 2005 and established an independent commission in 2006.<sup>4</sup> It further revised the act in 2012 and again in 2014. In 2016, the Anticorruption Commission and Ombudsman Board were merged into the current Integrity and Anticorruption Commission.<sup>5</sup> The Commission's mandate was further extended in 2019 to enhance its independence and strengthen its ability to seize illicit assets.<sup>6</sup>

“Anticorruption agencies are rarely a panacea in the struggle against corruption. They can be ignored, marginalized, pressured and starved for resources.”

Such entities do not exist in isolation. Institutionally, they are typically one of a number of players in the anticorruption space, which can include traditional police and criminal investigative units, supreme audit agencies, and internal audit and inspector general offices. At times, the number of different agencies can be extensive, and coordination between them can be problematic. In Iraq, for example, the Commission on Integrity operated along with Offices of Inspector General in each ministry for 15 years from 2004 until 2019.<sup>7</sup> The Board of Supreme Audit is charged with protecting public funds and avoiding waste and abuse. An Integrity Committee of Parliament provides monitoring and oversight for the anticorruption function and the preparation of anticorruption legislation. And a High Council for Combatting Corruption was established by the prime minister and tasked with crafting a grand strategy to tackle corruption.

Some scholars have questioned the efficacy of anticorruption agencies. Doig and Recanatini have written that, in the nearly two decades since

the introduction of UNCAC, such entities “are struggling to show a clear and significant impact in fighting corruption and are generally not regarded as the most effective policy tool available.”<sup>8</sup> Their critique is overstated, yet it touches upon an important truth. Anticorruption agencies are rarely a panacea in the struggle against corruption. They can be ignored, marginalized, pressured and starved for resources. They can find it difficult to gain traction on some of the more complex ways in which corruption is practiced within the MENA region—regulations that favor insiders and well-connected firms, pressures to take on silent partners in boards and business ventures, or the use of *wasta* or “connections” in public employment. And they are only part of a broader institutional framework. A robust anticorruption effort requires diligence across the public sector. Spending ministries need to carefully review their purchasing procedures to root out procurement fraud. Regulatory agencies need to make sure that their procedures are simple and transparent and that their employees are not being bribed to dispense special treatment. Revenue agencies must ensure that taxes and fees are applied consistently and collected fully. And control authorities, such as supreme audit agencies, must be diligent in their duties.

Beyond the government, such agencies exist within a broader political and cultural milieu that can make their task easier or more difficult. Nowhere is this more true than in fragile and conflict-afflicted states. There is a strong correlation between fragility and corruption throughout the MENA region. All countries falling at the bottom of Transparency International's CPI ranking—Lebanon, Iraq, Libya, Yemen and Syria—are also those who have struggled most with conflict and instability.

While anticorruption agencies may not be a panacea, they are not irrelevant either. Many have been granted significant authority and autonomy. They occupy the apex of their country's anticorruption effort and have been empowered to perform a range of important functions. Greater scholarly attention is now being devoted to analyzing the

efficacy of these agencies, yet this work remains in its infancy. As the International Anti-Corruption Academy noted in 2023, while many countries have invested in creating anticorruption authorities over recent years, “there is little scientifically generated evidence about whether or in what conditions they are effective.”<sup>9</sup> This paper seeks to help fill this important gap in the literature, paying particular attention to how these authorities could be strengthened in the MENA region.

### Methodology and Analytic Approach

This analysis will focus on seven anticorruption agencies or departments in MENA: Jordan, Iraq, Kuwait, Morocco, Oman, Palestine and Saudi Arabia. They were chosen largely because of their transparency in reporting data about their budgets, staffing and operations. These countries represent a geographically diverse mix of high- and middle-income countries from the Maghreb, Mashreq and Arab Gulf regions. They have different histories and political and administrative traditions. As Box 1 indicates, five of these countries are above the regional norm for the World Bank’s Worldwide Governance Indicators (WGI) Control of Corruption index, a composite indicator representing a range of different perception-based and expert assessments of corruption.<sup>10</sup> Two countries, Palestine and Iraq, fall below the regional average.

As will be discussed in greater detail below, transparency in reporting is a fundamental problem throughout the MENA region, and a number of countries were excluded from consideration not because their anticorruption efforts are small or unsuccessful but because relatively little information about them is publicly available. Attachment 1 notes that nine out of the sixteen MENA countries we examined do not publicly report anticorruption data on an annual basis. A notable example is the ACA in Egypt, a powerful agency located directly under President Sisi. Fortunately, a handful of countries, such as Iraq and Jordan, have made excellent progress in producing annual reports that summarize their operations in

considerable detail. The data within these reports has provided much of the source material for this analysis.

<b>Box 1<sup>i</sup></b>	
<b>The MENA Region and Selected Comparators</b>	
<b>The Worldwide Governance Control of Corruption Metric (2022)</b>	
<b>Country</b>	<b>CC Percentile Ranking (0 to 100)</b>
Singapore	98.60
Hong Kong	92.50
UAE	83.49
Qatar	79.25
Latvia	75.50
<b>Saudi Arabia</b>	<b>63.68</b>
Malaysia	62.30
Bahrain	59.43
<b>Kuwait</b>	<b>58.96</b>
<b>Jordan</b>	<b>58.02</b>
<b>Oman</b>	<b>57.55</b>
Romania	55.70
Tunisia	47.64
<b>Morocco</b>	<b>41.51</b>
Sri Lanka	40.10
<b>MENA Regional Average</b>	<b>39.91</b>
Indonesia	37.70
Algeria	28.30
Egypt	26.42
<b>Palestine</b>	<b>25.00</b>
Lebanon	13.68
<b>Iraq</b>	<b>10.85</b>
Libya	3.77
Yemen	1.42
Syria	0.94

**Source:** Authors’ calculations based on data from the Worldwide Governance Indicators.<sup>11</sup>

The performance of these countries is benchmarked against a diverse mix of seven comparators drawn from Europe, East Asia and South Asia. Two of these agencies, Singapore’s Corrupt Practices Investigation Bureau (CPIB) and Hong Kong’s Independent Commission Against Corruption

<sup>i</sup> MENA countries included in this analysis are highlighted in bold; other MENA countries are presented in black. Global comparator countries are highlighted in gold.

(ICAC), are widely viewed as being among the most effective agencies of their type. Latvia also scores well on global indices of corruption, and its Corruption Prevention and Combating Bureau, or KNAB—a rather awkward acronym in English—is transparent, amply resourced and generally seen as effective. Other countries, such as Malaysia and Romania, fall in the mid-range in terms of the effectiveness of their anticorruption efforts, whereas Sri Lanka and Indonesia fall towards the lower end of the spectrum. As noted above, four of these comparators are classified as high-income countries (Singapore, Hong Kong, Latvia and Romania), whereas Malaysia is classified as an upper-middle income country and Indonesia and Sri Lanka are lower-middle income countries. Both the MENA and comparative samples are likely to under-represent countries that are struggling with corruption. With the notable exceptions of Iraq and Palestine, such countries tend to not routinely publish information on their anticorruption efforts, making it difficult to analyze the efficacy of their operations or to benchmark them against others. This will skew the comparisons towards better performing agencies. However, this should still support the effort to draw appropriate recommendations regarding best practice from comparative experience.

### **The Good News: Areas Where Progress is Being Made**

Our analysis reveals several areas where MENA countries have made slow yet steady progress in their struggle against corruption. Their basic legal frameworks for combating corruption are generally adequate. These agencies appear to be growing in public trust and greater societal awareness, and they have established effective outreach and public information programs. Several are having success in the area of asset recovery. In many cases, their investigation and prosecution operations show signs of steady, if incremental, improvement.

### ***Underlying Anticorruption Legislation***

With the exception of Syria, all MENA countries are parties to the UNCAC Treaty.<sup>ii</sup> As such, they are subject to the UNCAC Implementation Review Mechanism, a peer review process that, in the words of the U.N. Office on Drugs and Crime (UNODC), “assists States parties to effectively implement the Convention.”<sup>12</sup> The peer review process typically involves oversight by two peer countries, including one from the same regional group. The first review cycle started in 2010 and covered Sections 2 and 4 on the Convention on Criminalization and Law Enforcement and international cooperation. The second cycle was launched in 2015 and covers the sections on preventive measures and asset recovery.

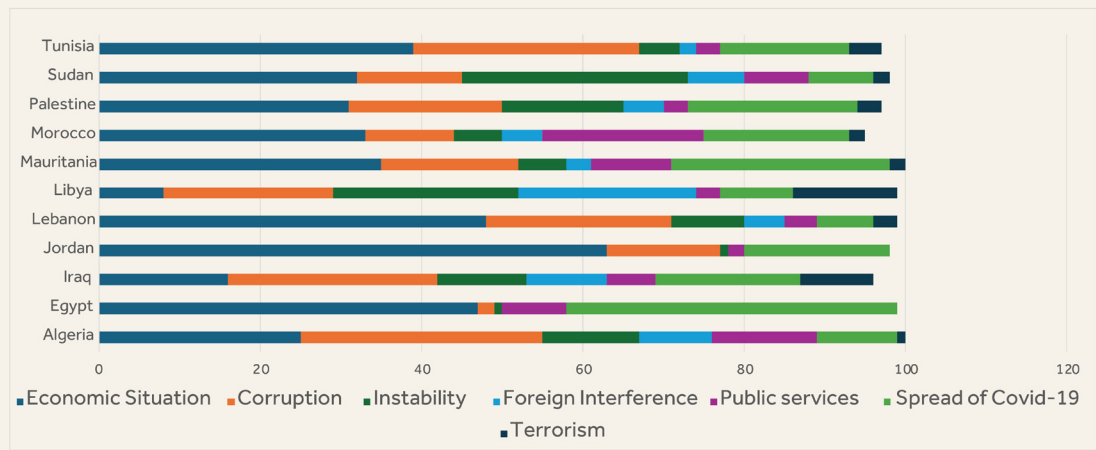
As a general rule, the underlying legal framework for tackling corruption in the subset of MENA countries reviewed in this analysis is not particularly deficient.<sup>13</sup> Most countries have sought to ensure that their national legislation is aligned with UNCAC and other relevant international standards with regard to active and passive bribery, embezzlement, illicit enrichment, maladministration, influence trading and abuse of office, and money laundering. There may be scope for improving various elements of their legal frameworks, such as strengthening provisions against the bribery of foreign officials or enhancing witness protection. But with limited exceptions, their basic legal frameworks are adequate for their national anticorruption efforts to proceed.

### ***Growing Societal Awareness and Trust in these Agencies***

As captured in Figure 1 below, polling data from the Arab Barometer indicates that concerns about corruption are often perceived to be among the most important challenges confronting individual countries in MENA. It is the primary concern in Algeria and Iraq, and among the top three concerns in Jordan, Lebanon, Libya, Mauritania, Palestine, Sudan and Tunisia.

ii. Syria signed the UNCAC treaty in 2003 but has yet to ratify it.

Figure 1: Most Important Challenge Facing the Country (%), 2021-2022



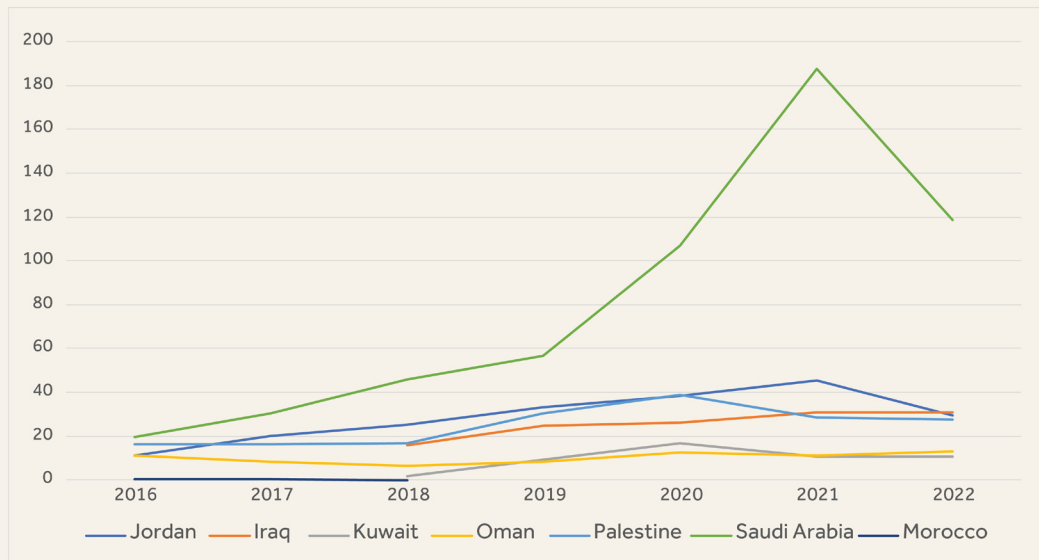
Public opinion is often highly critical, viewing corruption as rampant. Over 90 percent of Iraqis feel that corruption is extensive in state agencies and institutions, whereas only around a third believe that the government is trying to crack down on corruption.<sup>15</sup> Comparable figures regarding corruption's reach and influence can be found in other countries, such as Jordan (88 percent); Palestine (86 percent); and Kuwait (90 percent), even though their performance on global corruption indicators such as Transparency International's Corruption Perceptions Index (CPI) or the WGI Control of Corruption metric is significantly higher.<sup>16</sup>

Yet if one looks at the willingness of citizens within MENA to come forward with allegations of corruption as a marker of their revealed preference, the news is more encouraging. Figure 2 below captures the number of corruption-related complaints per 100,000 population. With the exception of Oman and Morocco, where complaints have remained relatively static over the past several years, the data for many countries indicates steady incremental upward progress over time.

Focusing upon the example of Palestine, Figures 3 and 4 below highlight a curious dichotomy between stated and revealed preference with regard to control of corruption. Figure 3 charts the number of corruption complaints per 100,000 population received by the Palestine Anti-Corruption Commission (PACC). It demonstrates some annual variation around a steady stream trending upwards, rising from 3.1 when the agency was restructured in 2011 to 27.6 in 2022. Yet while the Palestinian public was increasingly willing to come forward with complaints, public attitudes about the seriousness of the Palestinian Authority (PA) in combating corruption experienced a steady decline. Survey data underscores a significant and growing concern about corruption.<sup>18</sup> Around 19 percent of Palestinians described corruption as being the second most important challenge facing the country today, up from 8 percent in 2012-14.<sup>19</sup> Around 86 percent believe that corruption exists within the PA to a large or medium extent, and 58 percent said almost all or most PA officials are corrupt.<sup>20</sup> As Figure 4 indicates, the percentage of Palestinians thinking that the PA is working to combat corruption has decreased steadily over time.

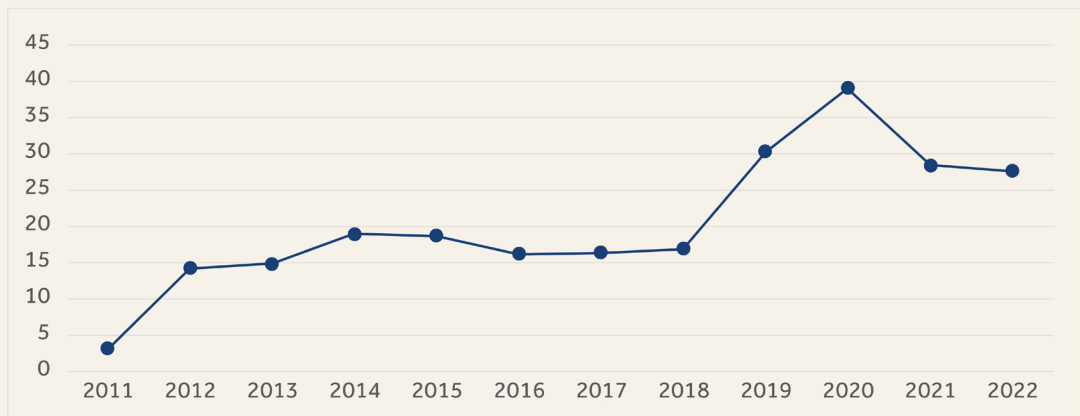


**Figure 2: Corruption Complaints per 100 000 population, 2016-2022**<sup>17</sup>



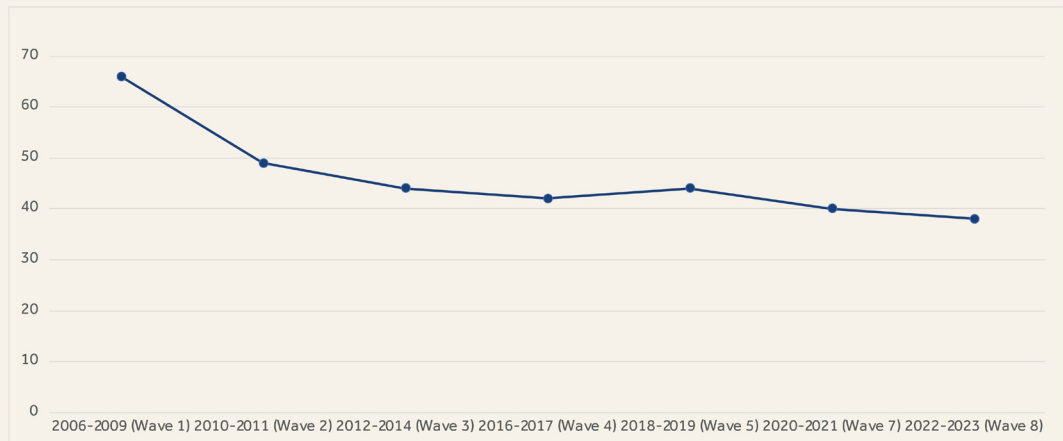
Source: Authors' calculations based on data from individual country reports.

**Figure 3: Palestine Corruption Complaints per 100000 population, 2011-2022**



Source: Authors' calculations based on data from PACC annual reports.<sup>21</sup>

**Figure 4: Percentage of Palestinians Thinking the Palestinian Authority is Working to Combat Corruption (%) , 2006 - 2023**



**Source:** Authors' calculations based on data from The Arab Barometer.<sup>22</sup>

Other MENA countries experienced similar trajectories with regard to the increase in corruption-related complaints. From 2016 to 2022, the number of complaints flowing to Jordan's apex anticorruption agency more than doubled, and Kuwait witnessed a five-fold increase between 2019 and 2022.<sup>23</sup> Many of these agencies were starting from a low base, and some of these increases appear to have plateaued or stabilized. Yet the data presents a generally encouraging picture regarding public response to the opportunity to come forward with allegations of corruption.

Complaint numbers in MENA do not appear to vary considerably from complaints in other regions. As Figure 5 indicates, the number of complaints per 100,000 may differ considerably even between well-established agencies operating within environments where corruption appears to be relatively rare. Hong Kong, for example, received an average of 29 complaints per 100,000 population during this period, whereas Singapore received only about five.

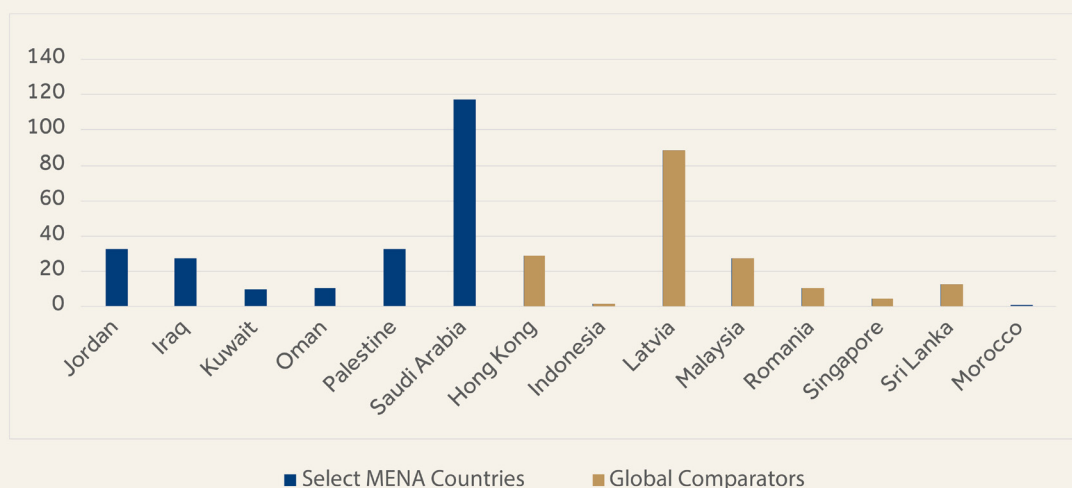
The MENA countries in this sample averaged around 32.9, with a low of 0.2 (Morocco)<sup>iii</sup> and a

high of 117 (KSA). The public's willingness to come forward with complaints is likely to be influenced by a variety of factors beyond those involving trust in the anticorruption agency itself, including the overall prevalence of corruption within the broader public sector as well as public awareness of the anticorruption agency's mandate and the ease through which corruption complaints can be brought forward. Whatever the underlying dynamics, there is no reason to suspect that MENA countries are uniquely disadvantaged in this area, and many of these agencies appear to have earned a sort of tacit acceptance over time.

The rapid expansion in corruption-related complaints within the Kingdom of Saudi Arabia is particularly interesting. The number of such complaints surged massively after the imprisonment of senior Saudi officials and businessmen in the Ritz Carlton Hotel in Riyadh in November 2017, rising from 30.4 per 100,000 in that year to 187.7 in 2021, before falling a bit in 2022. While the move was criticized outside the Kingdom, it appears to have been quite popular among many segments of Saudi society and to have opened the floodgates for corruption-related

iii. It is possible that the relatively low number of complaints in Morocco is because the anticorruption agency is not the primary focal point for corruption complaints from the general public, many of which may flow to the public prosecutor's office instead.

**Figure 5: Average Corruption Complaints per 100 000 population, 2019 - 2021**



**Source:** Authors' calculations based on data from individual country reports.<sup>24</sup>

complaints from a broad cross-section of citizens.<sup>25</sup> (Legal changes may also have played a role, as the Kingdom amended its anticorruption law in 2019 and again in 2021 to broaden its provisions.) The expansion in complaints does not appear to have been an elite or urban phenomenon, but to have spread throughout the country and been equally prominent in small rural provinces in addition to major cities. (See Figure 6.)

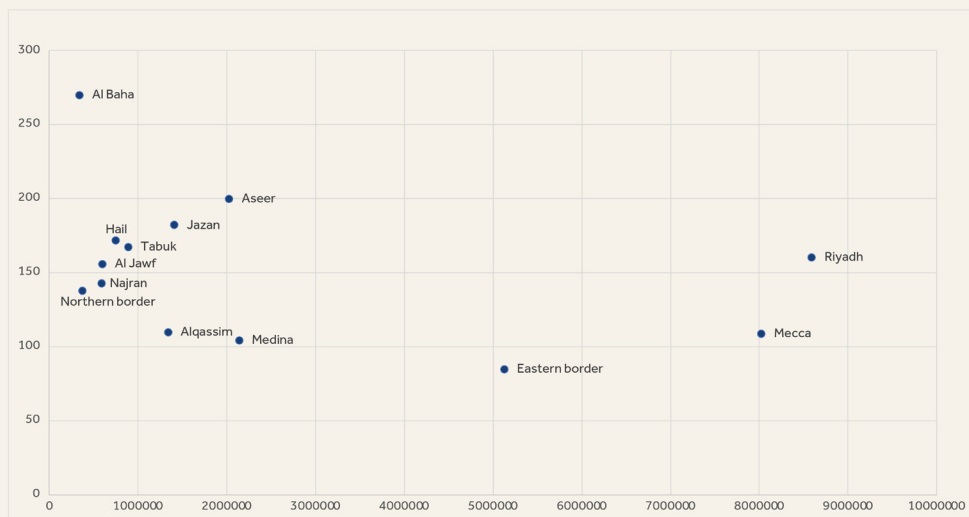
### **Cultivating Public Awareness**

Following in the footsteps of Hong Kong's Independent Commission Against Corruption (ICAC) and other successful anticorruption efforts, several MENA anti-corruption agencies are emphasizing public awareness. Education and public outreach are now viewed as core components of their operations. These agencies organize awareness lectures and workshops targeting different stakeholders (such as the public sector, security forces and civil society organizations), covering topics such as integrity, nepotism, fraud, financial literacy, conflicts

of interest and the preservation of public funds. Some are cooperating with educational institutions in offering lectures and training. These agencies are utilizing social media as well as more conventional media outlets, such as newspapers, TV and radio, in the effort to target different population demographics. Educational messages and infographics are shared to sensitize citizens, update them on the latest operations, and educate them on options for reporting corruption.

These outreach efforts are bearing fruit in enhancing the profile and public visibility of these agencies, strengthening trust and encouraging citizens to come forward and report corruption. For example, Jordan's Integrity and Anti-Corruption Commission (JIACC) has raised the Commission's profile, with its website visitors growing by over 1.1 million in 2022 and its number of Facebook followers increasing to over 116,000. (See Box 2 below.) By way of comparison, that same year Hong Kong's ICAC website received around 5.1 million visitors.<sup>27</sup>

**Figure 6: Saudi Arabia Provincial Population vs. Corruption Complaints per 100,000 Population, 2022**



Source: Authors' calculations based on data from Nazaha and the Saudi Census.<sup>26</sup>

### Box 2

#### Jordan's Anticorruption Prevention and Outreach Strategy<sup>28</sup>

Through its Integrity Directorate and its Media, Communication, and Public Relations unit, JIACC has displayed a remarkable commitment to preventive measures and public outreach. In 2022, the Commission organized 122 awareness lectures catered to different stakeholder groups. Of those, 53 were for public institutions, 8 were for municipalities, 4 were for health institutions, 22 targeted educational institutions (schools and universities), and 5 catered to civil society organizations. In disseminating content, JIACC relied on a number of different media platforms, including social media as well as SMS text messages, in an effort to target different age groups. JIACC circulated 167 news updates through its social media accounts; 87 educational posts on its Facebook page; 99 news flashes were published on its official website; and 28 educational awareness videos were produced during 2022.

### *Increasing Engagement of Civil Society*

Another constructive outcome has been the growth of civil society organizations (CSOs) active in the good governance space, such as think tanks, local chapters of Transparency International or the UNCAC Civil Society Coalition. These groups often track and monitor the progress of national anticorruption efforts. They have offered sophisticated analyses and recommendations about how the functioning of such agencies could be improved. The Tahrir Institute for Middle East Policy has provided a prescient assessment of the weaknesses of Jordan's anticorruption legislation and flagged important problems in implementation, such as staff shortages and budget shortfalls.<sup>29</sup> In a similar fashion, the CSO AMAN in Palestine has worked with PACC and championed a number of important good governance initiatives.<sup>30</sup> In Yemen, the UNCAC Civil Society Coalition has noted that greater independence and operationalization of anticorruption bodies are necessary to better implement and enforce anticorruption legislation.<sup>31</sup> In Kuwait, the Kuwait Transparency Society cooperated with Nazaha to follow up on the government's performance in dealing with the implications of the Covid-19 pandemic.<sup>32</sup> Such entities can serve as valuable allies in the struggle against corruption in both advocating for these agencies and holding them accountable for performance.

### *Accomplishments in Asset Recovery*

Illicit financial flows can be linked to a variety of offenses, including organized crime, terrorism, money laundering and corruption. While the size of these flows is unknown, a variety of estimates from the OECD, the World Economic Forum and others have placed the number at between 2.5 to 5.0 percent of global GDP—a sum that would be worth more than \$2.2 trillion in 2023.<sup>33</sup> And while the analysis of these flows is in its relatively nascent stages, it is also clear that only a small portion of

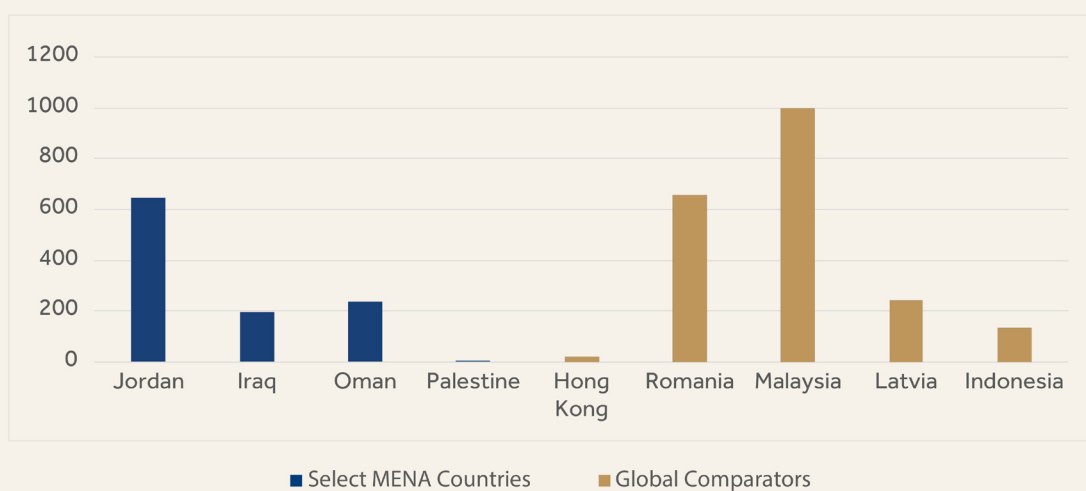
them are ever recovered. One analysis from the EU, for example, estimated that only around 2.2 percent of criminal proceeds were seized and frozen, and only around 1.1 percent were confiscated.<sup>34</sup>

In the wake of the Arab Spring, efforts were made towards asset repatriation and recovery in Egypt, Libya, Tunisia and Yemen. The sums involved were staggering. A 2014 analysis by Transparency International, for example, estimated that the illicit flows from Muammar Gaddafi's regime in Libya were in the range of \$61 billion and could run as high as \$120 billion.<sup>35</sup> A few of these efforts were successful. Tunisia was able to repatriate \$28.8 million in assets from a Lebanese bank account belonging to former president Ben Ali's wife.<sup>36</sup> But most fell far short of expectations. Such efforts can be demanding technically, requiring sophisticated accounting, legal and banking expertise that is often in short supply. They can take time to pursue and adjudicate. One analysis of these post-Arab Spring initiatives noted that they were plagued by a variety of challenges, including problems in tracking down assets and determining beneficial ownership, difficulties in linking specific assets with financial crimes, and problems in securing cooperation from countries where the assets were located, among others.<sup>37</sup>

There is a debate within the anticorruption literature regarding the extent to which investments in the seizure of assets associated with corrupt and illicit behavior can generate a positive return on investment.<sup>38</sup> The answer depends upon a variety of factors, including the overall levels of crime within the country and the efficiency and capacity of the investigating agency. Yet there are indications that, for many countries, investments in a robust asset recovery program will pay significant dividends over time—in some cases substantially exceeding the budgets of the enforcement agencies tasked with collecting them.<sup>39</sup> Our analysis has indicated considerable variation in asset recovery in MENA. (See Figure 7.) On the high end, several countries,

iv. In the case of Oman, these figures include the budget for the State Audit Institution, which has overseen the broader asset recovery effort.

**Figure 7: Average Asset Recovery as Percentage of Average Anticorruption Spending (%), 2020-2022**



**Source:** Authors' calculations based on data from individual country reports.<sup>41</sup>

including Jordan, Oman, Iraq and Morocco, have been able to recover assets well in excess of the annual budgets of their respective agencies.<sup>iv</sup> Oman has been particularly successful at recapturing assets, bringing in OMR 97.8 million in 2023 (around \$254 million).<sup>40</sup> Jordan's IACC averaged around \$36.5 million in asset recovery, well above its annual budget of around \$5.6 million. At the other end of the spectrum, the Palestinian Anticorruption Commission has been able to recover only relatively modest funds.

The good news is that for many MENA countries, a significant investment in asset recovery is likely to pay healthy dividends and generate a positive return on investment. It is also noteworthy that several MENA countries are already managing to recoup significant funds that would otherwise be lost to their governments.

#### ***Incremental Performance Gains***

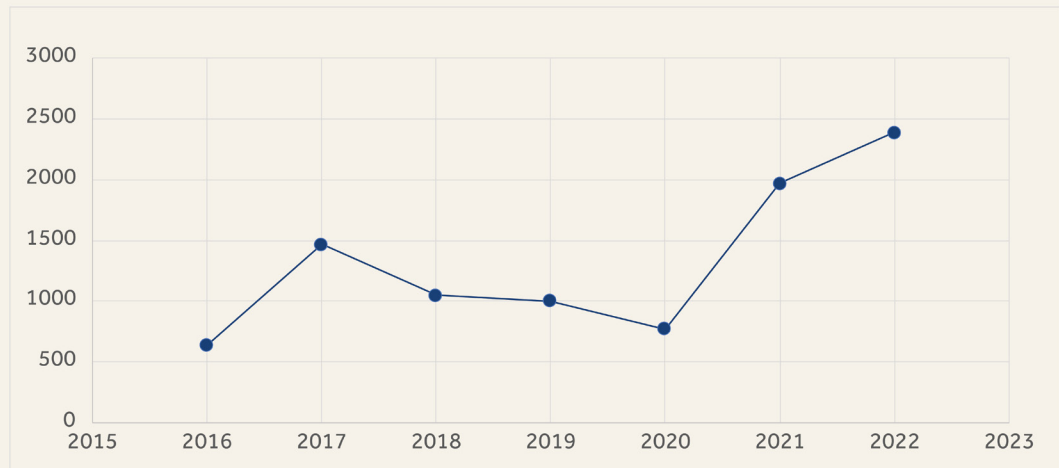
Finally, there is evidence that several of these agencies are gradually improving their performance

over time. Agency performance has both quantitative and qualitative elements. In the case of clearing investigations and reducing backlogs, it has stock and flow dimensions as well. Figures 8 and 9 illustrate that there has been a moderate increase over time in the number of cases investigated in both Jordan and Iraq. There are annual fluctuations, but the general trend has been upward.

Data from Saudi Arabia reveals a more nuanced or mixed trend. (See Figure 10.) There was a significant ramp-up in the number of oversight or traditional inspection visits, rising from 39,238 in 2021 to 44,871 by 2022, before falling significantly in 2023. Investigations and arrests have also declined during this period.

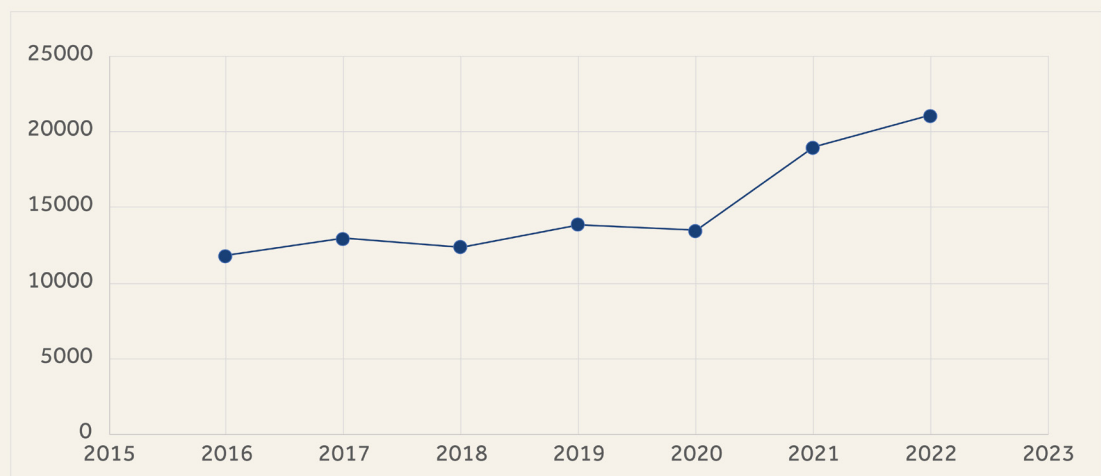
Qualitative improvements in performance are more difficult to measure. One potential metric would involve improvements in the conviction rate for investigations, on the assumption that agencies that are improving in their ability to investigate and assemble cases will be more successful in court. (A related metric could review the number of

**Figure 8: Jordan Total Investigations, 2016-2022**



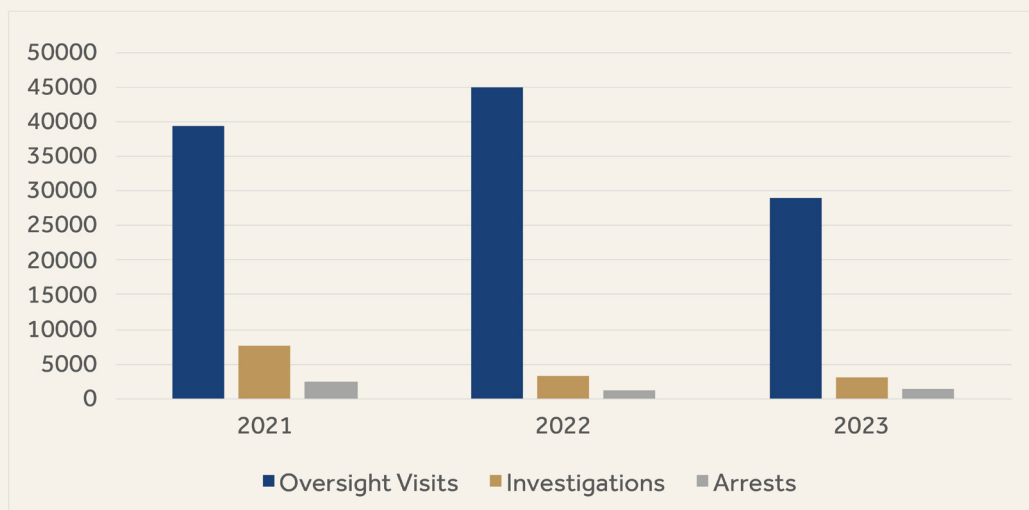
**Source:** Authors' calculations based on data from JIACC.<sup>42</sup>

**Figure 9: Iraq Total Investigations, 2016-2022**



**Source:** Authors' calculations based on data from ICO.<sup>43</sup>

**Figure 10: Nazaha Operational Data, 2021-2023**



**Source:** Authors' calculations based on data from Nazaha.<sup>44</sup>

convictions overturned on appeal.) The conviction rate for Singapore's CPIB, for example, varied between 97 and 99 percent for the period from 2018 to 2022. However, this high conviction rate must be contextualized by the fact that Singapore employs a robust triage process up front, and investigates only about a third of the reports it receives.<sup>45</sup> Additionally, the CPIB boasts an impressive clearance rate, completing around 85 percent of the investigations it undertakes in any given year.

Unfortunately, it is difficult to gather such information in MENA, and Arab countries differ significantly in the thoroughness and comprehensiveness with which they report on operational data. Preliminary analysis indicates that few MENA countries experience the high conviction rates of Singapore. Iraq averages a conviction rate of 28 percent of the cases brought to trial, and other MENA countries come in below that figure. Kuwait has a successful conviction rate of 16 percent, the lowest in our sample.<sup>46</sup>

This information is merely suggestive, and more detailed and comprehensive data are needed.

There is no guarantee of steady upward progress. Yet at least quantitatively, the general trend appears to be what one would expect over time, in that these agencies are incrementally improving their operations and gradually becoming better at the key functions they are tasked with performing, although plenty of scope for improvement remains.

### Continued Challenges and Growth Areas

#### Agency Independence

It has long been axiomatic among scholars and practitioners that effective anticorruption agencies require legal and operational independence.<sup>47</sup> To retain credibility, they need to be able to pursue leads, conduct investigations, and ultimately bring charges without fear of harassment or reprisal, particularly when these investigations involve the powerful and influential. Otherwise, they can be seen as enforcing a biased "two-tier" system of justice and will run the risk of losing public trust. Even worse, such agencies may become viewed as little more than tools for the persecution of political opponents.



There are several important dimensions of independence. Are the agencies separate and distinct legal entities capable of charting their own course and entering into contracts independently, or are they nested within a broader government ministry? Is the head appointed for a fixed term according to an established process? Is he or she subject to clear criteria for removal, or do they serve at the pleasure of the sovereign? Do they recruit their own staff or bring them in on secondment? Do these agencies enjoy operational independence in deciding who and what should be investigated with no external checks or constraints? Are their budgets guaranteed so that senior officials who do not like the course of an investigation cannot slash them?

“MENA countries confront two broader sets of issues in holding the corrupt to account. The first, not unique to MENA, is the challenge of obtaining successful criminal convictions against the wealthy and politically well-connected.”

A table of the legal and organizational arrangements for selected MENA anticorruption agencies is presented in Attachment 2. Practice varies considerably throughout the region. Many of the newer anticorruption agencies, such as those in Iraq, Jordan, Kuwait, Morocco and Palestine, have formal legal protections in place that provide considerable *de jure* independence. The authorities or commissions are distinct legal entities with their own boards, and their authorizing legislation repeatedly emphasizes their independence. Their heads are subject to clear criteria for removal. They are empowered to recruit their own staff. Their budgets, while subject to review by the ministry of finance and audit bureau, do not appear vulnerable to inappropriate manipulation.

At the other end of the spectrum, in many countries—including Algeria, Egypt, Lebanon,

Qatar, Saudi Arabia and the UAE—the apex anticorruption agency is located directly under the head of state. Such entities can be quite powerful, such as Nazaha in Saudi Arabia or the ACA in Egypt, and they can exercise considerable administrative discretion and authority over line ministries (although always under the purview of the emir or president). Or they could have relatively little autonomy, with important managerial decisions being subject to external review (as with Qatar) and their staff coming from other agencies on rotation (as with Algeria and Tunisia). In 2022, a review of Yemen’s anticorruption function by the UNCAC Civil Society Coalition emphasized the need for greater independence, noting that their legal independence under the law was largely adequate but that actual operational independence was poor.<sup>48</sup>

#### *Uneven Application of the Rule of Law*

MENA countries confront two broader sets of issues in holding the corrupt to account. The first, not unique to MENA, is the challenge of obtaining successful criminal convictions against the wealthy and politically well-connected. There are a few notable cases, such as Qatar’s former Minister of Finance, Ali Sherif al-Emadi, who was arrested for corruption in May 2021 and sentenced to 20 years in prison in January 2024 for money laundering.<sup>49</sup> But they are the exception and not the rule. Most high-level cases of corruption or official malfeasance are handled quietly and without ceremony. The officials involved typically resign or leave their posts suddenly with limited publicity. Rumors swirl but are rarely confirmed, and investigations almost never result in prosecution, fines, or imprisonment. Kuwait, for example, has witnessed a number of high-profile corruption allegations that led the prime minister to leave office in 2011 and the cabinet to resign en masse in 2019, yet no prosecutions followed. In the United Arab Emirates, a corruption probe resulted in the late Mohammed Khalfan bin Kharbash, the Minister of State for Finance, being removed from office in 2008 and charged with embezzlement in 2009. However, he pleaded not guilty and the case never went to trial.

A second problem in some countries are specific protections against prosecuting senior government officials that are embedded within their legal framework. In Jordan, for example, Article 86 of the Constitution prohibits the detention or trial of a member of the Senate or House of Representatives unless they are caught in the act and a majority agrees to allow the prosecution to proceed. Ministers also enjoy immunity from standard prosecutorial procedures, which can only be lifted by a majority vote of parliament. These provisions constitute such a high bar that, by one count, there are only two examples of when such immunity has been lifted.<sup>50</sup>

### *Transparency or the Lack Thereof*

One of the most notable areas of divergence across the MENA region involves transparency in reporting. International best practice typically recommends the production of a detailed annual report on agency operations. Such reports cover the organization's mission, mandate and major areas of activity. They detail available staff and financial resources. They highlight major accomplishments and developments during the course of the year. Most importantly, they discuss the progress made along various dimensions of the agency's mission and work streams, typically involving the investigation, prevention and public awareness functions. Such reports can provide a wealth of information regarding where the agency is performing well and where it is not. They can also play an essential role in strengthening accountability between the agency and its citizenry.

In MENA, one finds a strange inversion. In several countries widely seen to be struggling to control corruption, such as Iraq and Palestine, the quality of reporting is quite good. Iraq's Federal Commission of Integrity (Nazaha) has provided detailed annual reports for well over a decade, laying out its performance on a host of metrics. Other countries, such as Jordan, Kuwait, Morocco, Oman and Saudi Arabia, also produce public reports of varying degrees of comprehensiveness. There are the

odd gaps in the information provided, and such reports can often improve their integration and presentation of data (which should be standardized to facilitate cross-country comparisons). But they do not diverge in coverage or quality from agency reports in other regions. They also represent an important and good faith effort to report their activities transparently to their citizenry, as well as a solid foundation upon which to build.

On the other hand, a number of the countries that perform well on global anticorruption metrics, such as the UAE and Qatar, provide limited information on the functioning of their anticorruption efforts. Other countries where reporting is weak or non-existent include Algeria, Bahrain, Egypt and Tunisia. In fact, as Attachment 1 notes, more than half of the 16 MENA countries reviewed in this report have limited public reporting. The transparent reporting of agency performance data is a low-hanging fruit and one in which progress can and should be made quickly—particularly in countries such as the UAE, which aspire to global leadership in governance.

### *Improving Coordination with Other Relevant Entities*

Throughout the MENA region, government ministries and agencies tend to be siloed and lack the dense network of interagency working groups and collaborative protocols often found within OECD countries. Information flows tend to be highly vertical in nature, flowing to the top of the organization where they may (or may not) be shared with other government entities. It is therefore not surprising that anticorruption efforts—particularly those involving multiple agencies or procedures that cross administrative boundaries—can struggle. Issues of weak inter-agency coordination have been flagged in UNCAC reviews as problematic, including the fact that there is limited experience with information sharing and the creation of joint investigative teams.<sup>51</sup>

Issues of weak inter-agency coordination can be particularly problematic in asset recovery and repatriation. An analysis of problems in asset recovery in the wake of the Arab Spring by Transparency International noted the lack of an integrated policy or robust coordination mechanisms across a number of agencies posed a significant problem in Egypt and Libya.<sup>52</sup> Tunisia set up a special committee for the recovery of assets and enjoyed somewhat more success.

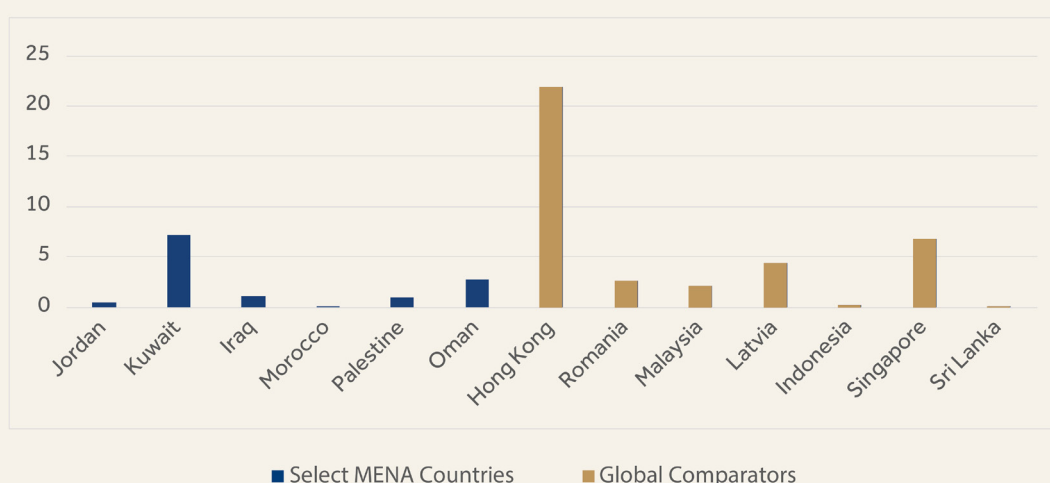
### Lack of Financial and Human Resources

The MENA region’s anticorruption efforts have been under-resourced and under-staffed in comparison with more established anticorruption agencies throughout the world. Figure 11 presents a breakdown of funding per capita for selected MENA countries vis-à-vis other comparators, focusing upon average funding for the most recent three years available. Such funding may not be the sole investment that countries make in their

anticorruption effort, as other entities ranging from the police and ministry of interior to supreme audit agencies may also play a role. Yet dedicated anticorruption agencies stand at the apex of a given government’s anticorruption effort, so it is not inappropriate to view their funding as a proxy for the seriousness of the government’s broader investment in combating corruption.

On average, the MENA countries in this sample spend around \$2.08 per capita on their dedicated anticorruption agencies, whereas at \$6.23 per capita the non-MENA sample spends just under three times as much. Within MENA, Kuwait is the exception, spending around \$7.15 per capita.<sup>v</sup> Removing the high-end outliers in each sample—Kuwait and Hong Kong—the remaining MENA countries would spend on average only around \$1.07 per capita. This figure is still less than half the sample average for their other comparators without Hong Kong.

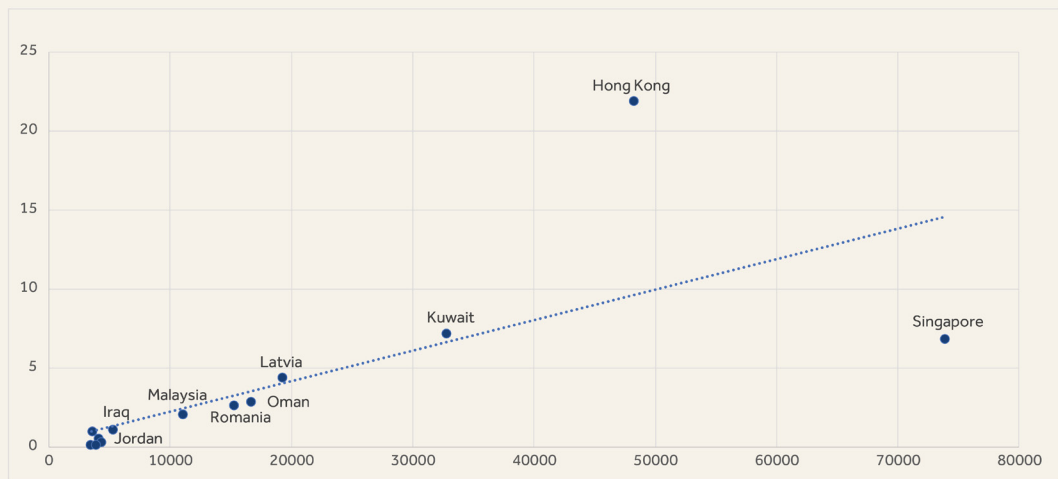
**Figure 11: Average Anticorruption Spending/capita (\$), 2017-2022**



**Source:** Authors’ calculations based on data from individual country reports.<sup>53</sup>

v. Unfortunately, budgetary data for Saudi Arabia’s Nazaha is not publicly available. Data for Oman is estimated based upon figures for the broader State Audit Institution, under which the Anticorruption Authority is housed.

**Figure 12: Average GDP/capita (\$) vs. Average AntiCorruption Spending/capita (\$)**



**Source:** Authors' calculations based on data from individual country reports and the World Development Indicators.<sup>54</sup>

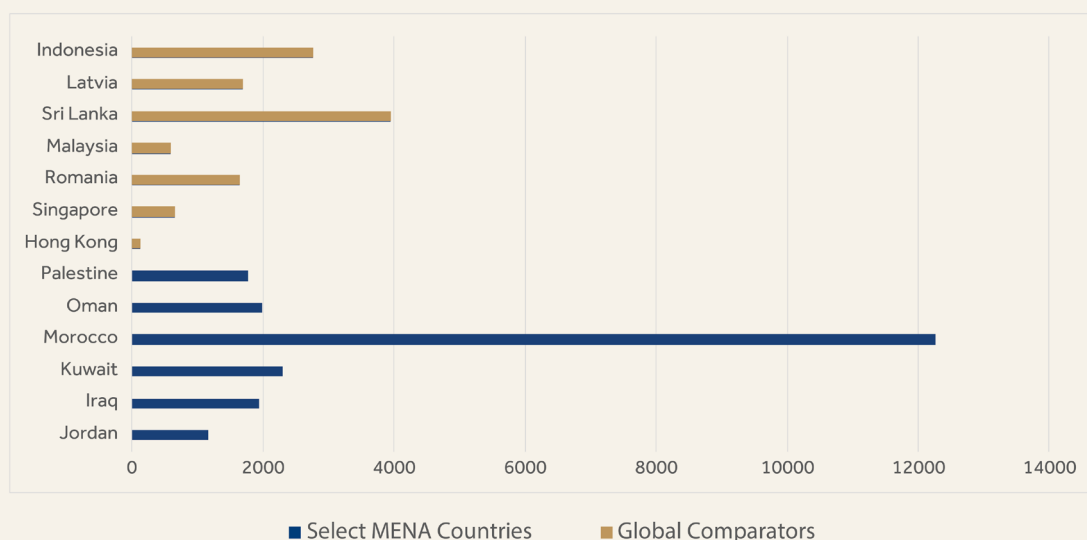
Not surprisingly, it is easier for wealthier countries to spend more on this function than poorer ones. Per capita spending on anticorruption in the countries within our sample is correlated with per capita GDP. This relationship is illustrated in Figure 12 below, which includes both data points comparing GDP per capita and per capita spending on apex anticorruption agencies and a fitted regression line. There is significant variation even between countries that score well on various anticorruption metrics. Hong Kong spends lavishly on its anticorruption effort, whereas Singapore spends less than one would anticipate given its high GDP. Yet even after adjusting for differences in per capita GDP, almost all MENA countries spend less on this function than would be anticipated for a given level of income. As noted above, the only exception is oil-rich Kuwait, which spends slightly above the regression line.

Turning to the question of staffing, Figure 13 presents a relatively broad-brush assessment of the number of dedicated staff within the apex anticorruption agency per number of civil servants.

The greater the number of civil servants per dedicated anticorruption staff, the more likely it is that the agency will be stretched thinly to perform its mandate. As Figure 13 notes, MENA anticorruption agencies are often operating at a significant disadvantage vis-à-vis counterparts in other parts of the world. Hong Kong's ICAC has one staff for every 122 civil servants; Malaysia has one for every 590; and Singapore's CPIB has one for every 834. In contrast, Jordan's anticorruption agency has one staff for every 1,170 civil servants; Iraq has one for every 1,943; and Morocco has one for every 12,261. In MENA, no country has more than one dedicated anticorruption staff per 1,000 civil servants, whereas in our non-MENA sample, three out of seven countries met this benchmark.

For a number of reasons, aggregate staffing numbers are likely to tell only part of the story. In the annual report data, it is often difficult to differentiate between allocated positions and actual staff in place. Some anticorruption agencies may retain certain functions in-house (such as

**Figure 13: Average Dedicated Anticorruption Staff per Number of Civil Servants, 2018-2023**



**Source:** Authors' calculations based on data from individual country data and reports.<sup>55</sup>

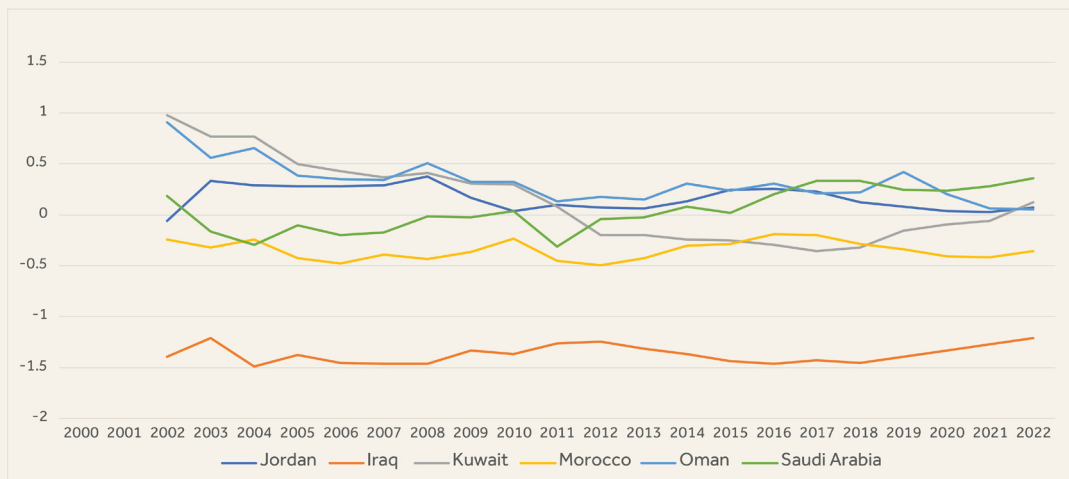
prosecution), whereas others will rely upon the ministry of justice to perform this task, making it difficult to compare like with like. Staff capacity is also unlikely to grow at a linear rate. There will be a core or critical mass required for such agencies to reach some minimal threshold of effectiveness. At the upper end, there may also be a level of diminishing returns beyond which each additional staff brings less and less added value.

What probably matters more than aggregate staff numbers is the type of staff employed and their skills mix, particularly the ratio of frontline investigative staff to ancillary and support staff. Do these agencies have staff trained in the types of skills they need to track sophisticated crimes, including forensic accounting, money laundering and cyber-crime? Unfortunately, very few anticorruption agencies break down their staff composition in detail in public documents, so it is difficult to understand the capacity of the staff and any gaps in their skills with any degree of granularity.<sup>56</sup> However, as an initial approximation, it is clear that MENA anticorruption agencies are

not staffed at a level that is comparable with some of the best performers elsewhere in the world. In all likelihood, they would benefit from a significant expansion, particularly with regard to frontline investigative staff and staff with expertise in the technical areas noted above.

Looking across both the MENA and non-MENA countries in this sample, we ran regressions to understand the relative weight and importance of these variables, exploring the correlation between spending, staffing and WGI scores on Control of Corruption.<sup>57</sup> Spending appears to be quite important, indicating that greater investment in anticorruption agencies tends to be positively correlated with higher scores on the WGI Control of Corruption metric. While this does not prove a causal relationship, it does raise the possibility that MENA countries could potentially reap gains through increased investment in their anticorruption effort—a finding that makes sense given the historic underfunding of many MENA agencies vis-à-vis their counterparts in other regions. With regard to staffing, the correlations are less robust.

**Figure 14: WGI Control of Corruption, 2000-2022**



Source: Authors' calculations based on data from the Worldwide Governance Indicators.<sup>60</sup>

**Conclusion: How Effective Are These Agencies?**

At some level, it is easy to be dismissive about the efficacy of various anticorruption initiatives in MENA. Large numbers of the public in many countries are relatively disillusioned by their national anticorruption efforts. In their 2020 Corruption Perceptions Index assessment, Transparency International noted that the region, "is still perceived as highly corrupt, with little progress made towards controlling corruption."<sup>58</sup> As Figure 14 indicates, no country in our sample has witnessed a transformative shift over the past twenty years on the WGI Control of Corruption metric, although some (such as Saudi Arabia) are witnessing a gradual trend upwards. In fairness, the stability and consistency of such aggregate rankings over time is a global phenomenon and not limited simply to MENA. It is also one that critics of indicators such as Transparency International's CPI have flagged as problematic.<sup>59</sup>

Within this broader milieu, MENA's anticorruption agencies may ultimately play an important role. Their experience over the past decade provides

grounds for cautious optimism. In spite of the obstacles and challenges, progress is being made. Legal frameworks are consistently being tweaked and adjusted to comport with international norms. Complaints are rising, and agencies appear to be gaining public credibility and trust. Several are recovering lost assets at a healthy clip. And their operations are, with various ups and downs, displaying signs of incremental improvement.

Significant progress in the struggle against corruption can take decades. Singapore's CPIB was founded in 1952, and Hong Kong's ICAC was created in 1974. The agencies in this sample of MENA countries are still in their nascent stages. They can serve as the foundation for a robust anticorruption function in the future—and indeed some are serving this purpose now. Given independence and adequate resources, these institutions are likely to consistently improve their operations over time and, in doing so, improve the integrity of the broader public sector in which they operate.

Moving forward, our analysis identifies a number of near-term priorities that will help to improve these anticorruption efforts and accelerate the progress they are making.

### 1. *Greater Transparency and Accountability in Agency Reporting.*

MENA countries vary substantially in the information they make publicly available. Some are quite fulsome, such as Iraq, Jordan and Palestine. Others make an effort yet are missing key elements, such as Saudi Arabia. And more than a few make very little or no information available, including several—such as Egypt, Qatar and the UAE—who could clearly do better. The UNCAC Jakarta Statement on Principles for Anti-Corruption Agencies holds that such agencies should report at least annually on their activities.<sup>61</sup> Efforts should be made through international organizations, such as UNCAC, the IMF and the World Bank, as well as regional organizations, such as the Conference of State Parties to the Arab Convention Against Corruption, to ensure that all regional countries provide annual reports on the performance of their agencies. This is a “low hanging fruit” that should be relatively easy to undertake. These reports should be made available in digital and print media. They should also be circulated widely within the business, academic and civil society communities.

Even better, such reports should be disseminated as part of a broader communications strategy targeted at various demographic groups, not unlike the public outreach practiced by Jordan’s IACC. A pronounced pessimism may exist in MENA that interprets corruption prosecutions not as evidence of anticorruption agencies doing their jobs, but as confirmation of the inherent corruption within the system. Turning such perceptions around will require a careful program of outreach and targeted communications sustained over time.

### 2. *Greater Standardization in Data Collection*

In a related point, more standardization in data collection among countries that report on their anticorruption efforts is needed. It would be helpful to include the breakdown between investigative staff, technical experts and administrative staff, for example. It would be valuable to understand the backlog of investigations and how many are cleared within a given year. Knowing how many investigations end in charges being brought or administrative discipline being imposed and how many ultimately end in a conviction would add critical insight. Revealing the types of crimes that are most prevalent would serve to add more transparency. The gold standard will be to develop a clear understanding of the risks that civil servants face in engaging in various types of corrupt behavior. Current data collection is often fragmented or lacking cohesion, making it challenging to gain a comprehensive picture or to compare different data sets against each other.

Striking a clear balance is essential for pursuing this objective. Reporting requirements that are too onerous or time-consuming to fulfill or which do not generate data that they would find operationally useful would only serve to overburden agencies. Not all the data gathered for operational purposes needs to be included in the common reporting framework.

### 3. *Greater Resourcing*

One of the key findings of this analysis is the relative lack of funding for many MENA anticorruption agencies. Limited budget resources are a clear constraint in many countries, particularly those outside of the Gulf Cooperation Council (GCC). Regressions across our sample of MENA and non-MENA countries indicate a particularly strong correlation between higher WGI scores on control of corruption and greater spending per capita on apex anticorruption agencies. With limited exceptions, most MENA countries would benefit

from developing careful time-bound plans to significantly ramp up the resources devoted to their anticorruption function.

The need for increased staffing is less obvious and will require more detailed and nuanced analysis. There are reasons to suspect that many MENA anticorruption agencies are under-staffed, as noted above. Yet the relationship between increased staffing and better WGI Control of Corruption scores is less pronounced. In all likelihood, the nature of staffing matters more than their aggregate number. More investigators, prosecutors, forensic accountants and experts in money-laundering and cybercrime would no doubt prove valuable. Clerks and back-office administrative staff would probably be less so.

#### *4. Improved Investment in Asset Recovery*

Some MENA countries, such as Jordan and Oman, are already performing effectively in the area of asset recovery, bringing in funds that are well in excess of their annual operating budgets. Other countries are much less effective. A region-wide push, perhaps supported by entities such as UNODC or the World Bank's Stolen Asset Recovery (or STAR) initiative, should foster improved regional cooperation and information sharing and help states that are lagging behind to improve their performance. There may also be opportunities for peer-to-peer learning, perhaps supported by entities such as the Conference of State Parties to the Arab Convention Against Corruption, in which Arab states that are performing well in this area could partner with those that are not.

#### *5. Revise Legal Frameworks to Make it Easier to Prosecute Senior Officials for Corruption*

As noted above, a few countries, such as Jordan, have established very high bars for the prosecution of senior government officials, requiring a majority vote of parliament for judicial proceedings to take place against ministers, for example. These legal loopholes should be lowered or eliminated.



## Attachment 1

### MENA Apex Anticorruption Agency Annual Reports (As of September 2024)

Country	Anticorruption Authority	Annual Report (Years)	Website URL
Algeria	The Central Anticorruption Office	None	<a href="https://www.ocrc.gov.dz/en">https://www.ocrc.gov.dz/en</a>
Bahrain	General Directorate of Anti-Corruption and Economic and Electronic Security	None	
Egypt	Administrative Control Authority	None	<a href="https://aca.gov.eg/">https://aca.gov.eg/</a>
Iraq	Federal Commission of Integrity	2006-2023	<a href="https://nazaha.iq/en/default.asp">https://nazaha.iq/en/default.asp</a>
Jordan	Integrity and Anticorruption Commission	2013-2022	<a href="https://www.jiacc.gov.jo/">https://www.jiacc.gov.jo/</a>
Kuwait	Kuwait Anticorruption Authority	2016/2017-2023/2024	<a href="https://nazaha.gov.kw/nazaha/">https://nazaha.gov.kw/nazaha/</a>
Lebanon	National Anti-Corruption Commission	None	
Libya	Libyan State Audit Bureau	None	<a href="https://www.audit.gov.ly/">https://www.audit.gov.ly/</a>
Morocco	The National Anticorruption Commission	2019-2022	<a href="https://www.inpplc.ma/">https://www.inpplc.ma/</a>
Oman	State Audit Institution	2020-2022	<a href="https://www.sai.gov.om/">https://www.sai.gov.om/</a>
Palestine	Palestinian Anticorruption Authority	2011-2023	<a href="https://www.pacc.ps/">https://www.pacc.ps/</a>
Qatar	The Administrative Control and Transparency Authority	None	<a href="https://www.acta.gov.qa/">https://www.acta.gov.qa/</a>
Saudi Arabia	Oversight and Anticorruption Authority (Nazaha)	2016-2022	<a href="https://nazaha.gov.sa/Index">https://nazaha.gov.sa/Index</a>
UAE	UAE Accountability Authority	None	<a href="https://uaehaa.gov.ae/">https://uaehaa.gov.ae/</a>
Yemen	Supreme National Authority for Combating Corruption	None	<a href="https://www.snaccye.org/">https://www.snaccye.org/</a>

## Attachment 1 (cont.)

### Apex Anticorruption Agency Reporting (Selected Countries)

Country	Operational data					Budgetary data	Human resources data
	Complaints	Investigations	Prosecution	Conviction	Asset recovery		
Jordan	✓	✓	✓	X	✓	✓	2017-2019
Kuwait	✓	✓	✓	✓	X	✓	✓
Morocco	✓	✓	✓	✓	2021	✓	2022
Saudi Arabia	✓	✓	X	X	X	X	X
Palestine	✓	✓	✓	✓	✓	X	X
Oman	✓	✓	✓	X (just examples of issued convictions)	✓	X	✓
Iraq	✓	✓	✓	✓	✓	✓	✓

## Attachment 2

### Reporting Relationships of MENA Anticorruption Agencies

Country	National Anti-corruption agency	Organizational Structure & Legal Arrangements
Algeria	<i>The Central Anti-Corruption Office</i> <a href="#">(C.A.C.O)</a>	General Director. <sup>vi</sup>
Egypt	<i>Administrative Control Authority</i> <a href="#">(A.C.A)</a>	Chairman appointed by Presidential decree upon nomination by the President of the Executive Council. <sup>vii</sup>
Jordan	<i>Integrity and Anti-Corruption Commission</i> <a href="#">(JIACC)</a>	Chairman and a board (composed of the chairman and four other members)  recommended by the Prime Minister and installed by Royal Decree. <sup>viii</sup>
Iraq	<i>Federal Commission of Integrity</i> <a href="#">(Nazaha)</a>	Commissioner, appointed by an absolute majority vote of the Council of Representatives and selected from three candidates chosen by a committee from the Council's Integrity and Legal Committee. <sup>ix</sup>
Kuwait	<i>Kuwait Anti-Corruption Authority</i> <a href="#">(Nazaha)</a>	Board of trustees (composed of seven members including the president) nominated by the minister of justice and appointed by decree. <sup>x</sup>

vi "Presentation," The Central Anti-Corruption Office, accessed September 22, 2024, <https://www.ocrc.gov.dz/en/presentation>.

vii *Al qanun raqm 45 li sanat 1995 bisha'n hay'at al raqaba al idariya* [Law No. 45 of the year 1995 regarding the Administrative Oversight Authority] [https://alp.unescwa.org/sites/default/files/2021-09/Egypt\\_Law54\\_y1964\\_on\\_Administrative\\_Control\\_Authority\\_AR%20%281%29.pdf](https://alp.unescwa.org/sites/default/files/2021-09/Egypt_Law54_y1964_on_Administrative_Control_Authority_AR%20%281%29.pdf), article 12, page 6.

viii *Integrity and Anti-Corruption law No. (13) of 2016*, [https://www.jiacc.gov.jo/EBV4.0/Root\\_Storage/EN/EB\\_Blog/integrity\\_and\\_anti\\_corruption\\_law\\_of\\_2016.pdf](https://www.jiacc.gov.jo/EBV4.0/Root_Storage/EN/EB_Blog/integrity_and_anti_corruption_law_of_2016.pdf), article 6, page 0.

ix *Qanun hay'at al nazaha* [Integrity Commission Law] [https://nazaha.iq/pdf\\_up/1545/low\\_nazaha.pdf](https://nazaha.iq/pdf_up/1545/low_nazaha.pdf), article 4, page 2.

x *Qanun raqm (2) li sanat 2016 fi sha'n insha' al hay'a al 'ama li mukafahat al fasad wa al ahkam almuta'aliqa bi al kashf 'an al dhima al malia* [Law No. 2 of 2016 On the Establishment of the General Authority for Combating Corruption and the Provisions Relating to the Disclosure of Financial Assets], <https://shorturl.at/pzyP1>, article 6, page 3.

Country	National Anti-corruption agency	Organizational Structure & Legal Arrangements
Morocco	<i>The National Anti-Corruption Commission</i> ( <a href="#">INPPLC</a> )	President and a Board (composed of twelve members other than the president) appointed by decree. <sup>xi</sup>
Oman	<i>State Audit Institution</i> ( <a href="#">SAI</a> )	President and two deputies appointed by Royal Decree. <sup>xii</sup>
Palestine	<i>Palestinian Anti-Corruption Authority</i> ( <a href="#">PACC</a> )	President appointed by Decree of the Head of State upon recommendation from the Council of Ministers. <sup>xiii</sup>
Qatar	<i>Administrative Control and Transparency Authority</i> ( <a href="#">ACTA</a> )	President assigned by Emiri Decree. <sup>xiv</sup>
Saudi Arabia	<i>Oversight and Anti-Corruption Authority</i> ( <a href="#">Nazaha</a> )	President installed by Royal Decree. <sup>xv</sup>
United Arab Emirates	<i>UAE Accountability Authority</i> ( <a href="#">UAEAA</a> )	Chairman installed by Federal Decree. <sup>xvi</sup>

xi *Zahir sharif raqm 1.21.36 al saadir fi 8 ramadan 1442 (21 'abril 2021) bitanfidh alqanun raqm 46.19 al muta'aliq bi al hay'a al watanii li al nazaha w al wiqaya min al rashwa wa muharabatiha [Royal Decree No. 1.21.36 issued on Ramadan 8, 1442 (April 21, 2021) implementing Law No. 46.19 relating to the National Authority for Integrity and Preventing and Combating Bribery]*, <https://inpplc.ma/ar/zhyr-shryf-rqm-12136-alsadr-fy-8-rmdan-1442-21-abryl-2021-btndfydh-alqanwn-rqm-4619almtlq-balhyyt>, article 9, page 3.

xii *Marsum sultani raqm 2011/111 bi isdar qanun al raqaba aal maliya wa al 'idariya li al dawla [Sultan's Decree No. 111/2011 Issuing the Law on Financial and Administrative Control of the State]*, <https://www.sai.gov.om/storage/laws/111-2011.pdf>, article 13, page 7.

xiii *Qanun mukafahat al fasad raqm (1) li sanat 2005 miladi wa ta'dilatuh [Anti-Corruption Law No. (1) of 2005 AD and its amendments]* <file:///C:/Users/Dell/Downloads/book-10277-cat-1-d-19-06-19.pdf>, article 3,3, page 4.

xiv *Emiri Decision*, <https://www.acta.gov.qa/en-us/AboutActa/Pages/Emiri-Decision.aspx>, article 7.

xv *Royal Order No. A/65 of 2011 Establishing the National Anti-Corruption Commission*, <https://faolex.fao.org/docs/pdf/sau202741E.pdf>, article 2, page 1.

xvi *Federal Law by Decree No. (56) of 2023 Concerning the Emirates Accountability Authority*, <https://uaelegislation.gov.ae/en/legislations/2174/download>, article 7, page 12.

## ENDNOTES

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  - 2 Kayyali, Arab Public Opinion, 29.
  - 3 United Nations Office on Drugs and Crime, *United Nations Convention Against Corruption*, (New York, United Nations: 2004), [https://www.unodc.org/documents/brussels/UN\\_Convention\\_Against\\_Corruption.pdf](https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf).
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- 57 Looking across both the MENA and non-MENA countries in our sample, we ran regressions to understand the relative weight and importance of these variables, exploring the correlation between spending, staffing and WGI scores on Control of Corruption. Spending appears to be quite important, with a positive beta coefficient and an  $R^2$  of 0.604, indicating that greater investment in anticorruption agencies tends to be positively correlated with higher scores on the WGI Control of Corruption metric. With regard to staffing, the correlations are less robust. Staffing has a high p-value (0.393) while spending has a low p-value (0.042), so the high  $R^2$  value is clearly due to the correlation with spending. The spending regression line is positive, whereas the staffing line is more or less flat with a slight negative slope.
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**MIDDLE EAST COUNCIL ON GLOBAL AFFAIRS**

Burj Al Mana 3rd floor, Street 850, Zone 60, Doha, Qatar

[www.mecouncil.org](http://www.mecouncil.org)



## ABOUT THE AUTHORS

**Robert P. Beschel Jr.** is a senior nonresident fellow at the Middle East Council on Global Affairs (ME Council). He consults as senior advisor on governance and public sector management for the World Bank, the Asian Infrastructure Investment Bank and several leading management consulting firms. Beschel's areas of research include governance and public sector management, economic development, fiscal policy, and anticorruption, among others.

**Oumeyma Chelbi** is a junior visiting fellow at the ME Council. She graduated from the Doha Institute for Graduate Studies in Qatar with a master's degree in development economics. Chelbi's research interests include corruption, governance, development economics, and entrepreneurship in the Middle East and North Africa region.

**Isaac Schaider** is currently an investor with D.E. Shaw. He has a Masters in Data Science from Stanford University and has previously worked as an intern at the Middle East Council on Global Affairs.

The authors would like to thank Yasmina Abouzzohour, David Bernstein, Paul Dyer, Mohammad Abu Hawash, Nader Kabbani and Andrew Letzkus for their help and support at various stages of the drafting process

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