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Roles, Rules, and Controls:

An Analytical Review of the Governance of Social Protection in Egypt

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Abstract

Egypt's social protection system has undergone substantial reform over the past decade, yet governance constraints continue to limit effectiveness, equity, and public trust. This paper applies an integrated governance lens centred on the rules of the game, institutional roles and responsibilities, and controls and accountability mechanisms to two cornerstone schemes: the contributory social insurance pension system and the non-contributory Takaful and Karama cash transfer programme. It builds on a 2021 analytical governance review of Egyptian social protection programmes prepared by the author, and updates that work with legal, institutional, and operational developments up to 2024, including implementation of Law 148 of 2019, expansion of the unified social registry, wider use of digital payment systems, stronger enforcement provisions in social insurance, and the rollout of grievance and social accountability mechanisms in Takaful and Karama. Using qualitative data from expert interviews and documentary analysis, the paper shows that the unified Social Insurance Law has simplified formal rules and consolidated administration, but persistent challenges in enforcement, extension of coverage to informal workers, human resource capacity, and inter ministerial coordination continue to undermine outcomes. For Takaful and Karama, updated analysis confirms that clear eligibility and targeting rules, a robust management information system, electronic payments, and data driven recertification have improved poverty targeting and delivery, yet gaps in transparency, local implementation, and effective use of grievance and community monitoring arrangements constrain perceived fairness and responsiveness. The comparative discussion highlights cross cutting governance deficits and programme specific issues and argues that further gains require stronger system wide coordination, deeper integration of information systems, and more institutionalised oversight and citizen engagement.

Keywords: Social Protection; Governance; Egypt; Social Insurance; Cash Transfers; Accountability; Institutional Reform

Introduction

Social protection (SP) has become a central pillar of Egypt's social policy reforms in the wake of the 2011 Arab Spring, reflecting a renewed emphasis on social justice and poverty reduction (Jawad, Jones, & Messkoub, 2019; Selwaness & Messkoub, 2019). In recent years, Egypt's SP system has undergone major changes, including the launch of new targeted programs and the overhaul of existing schemes, to address persistent poverty and vulnerability. However, despite these efforts, the governance of SP in Egypt continues to face critical shortcomings. A key challenge is inadequate coordination among institutions, which hampers the development of a comprehensive, coherent, and sustainable SP system (Devereux, 2016; UN ESCWA, 2019). Even flagship programs like the contributory social insurance scheme and the non-contributory Takaful and Karama cash transfer program exhibit a disconnect between their design and implementation, with overlapping mandates and blurred accountability undermining their effectiveness. These governance gaps reveal a knowledge gap in understanding how institutional arrangements - the rules, roles, and controls that underpin programs - affect social protection outcomes. Most prior studies of social protection in Egypt have focused on program design, coverage, and impact, or on specific policy reforms, without explicitly using a governance lens (Selwaness & Messkoub, 2019). Few have examined the interplay of legal frameworks, institutional responsibilities, and accountability mechanisms across the system.

This paper adopts the conceptual framework of “Rules, Roles, and Controls,” originally developed by the World Bank (Bassett, Giannozzi, Pop, & Ringold, 2012), to analyze Egypt’s social protection governance. This framework defines governance in terms of accountability relationships and incentives, and identifies three operational entry points: (1) the rules of the game, the laws, regulations, and program rules that shape behavior; (2) the roles and responsibilities of institutions and stakeholders; and (3) the controls and accountability mechanisms that enforce compliance, reduce fraud, and ensure transparency (Bassett et al., 2012). By applying this integrated governance lens, we aim to show how recent reforms have altered these dimensions and where gaps remain.

We focus on two case studies representing the contributory and non-contributory pillars of Egypt’s SP system: the national social insurance and pension scheme (a contributory program for formal sector workers) and the Takaful and Karama (TK) program (a targeted cash transfer for poor households). These were chosen because they are flagship programs in their respective domains and together cover a large segment of Egypt’s population. Importantly, they also illustrate common governance challenges in Egypt’s SP system. While not exhaustive of all programs, the two cases provide insight into broader systemic issues that can be generalized to some extent. Recent developments since 2019 make this analysis timely: the Social Insurance and Pensions Law No. 148 of 2019 unified multiple pension laws into one framework, and the Takaful and Karama program rapidly expanded to become one of the largest cash transfer schemes in the Middle East (Selwaness & Messkoub, 2019).

The remainder of the paper is structured as follows. We first review relevant literature on governance concepts and social protection in Egypt, grounding our approach in existing theoretical and empirical work. We then provide background on Egypt’s social protection system, highlighting major programs, reforms, and governance arrangements in the contributory and non-contributory sectors. Next, we outline our methodology, which is based on qualitative case studies and draws on interviews and document analysis. We then present the case study analyses: first for the pension social insurance system, and second for the Takaful and Karama cash transfer program, each organized around the “rules, roles, and controls” framework. A comparative discussion follows, examining cross-cutting governance issues and differences between the two schemes.

Literature Review

Governance is a broad concept that has been defined in various ways in public policy and administration literature. At its core, *governance* refers to the processes and structures through which authority is exercised, and decisions are made and implemented in the pursuit of collective goals. Rather than a single actor, governance typically involves multiple actors (state, private sector, civil society) and multiple levels of organization. In the context of social policy, governance encompasses the institutional arrangements, rules, and oversight mechanisms that determine how social programs are managed and how resources are allocated and controlled. Pierre and Peters (2020) note that governance has increasingly become about networks and coordination beyond hierarchical government structures. In other words, effective governance requires aligning the incentives and actions of diverse stakeholders toward common objectives.

In social protection, governance has concrete implications for program performance: clear legal frameworks, well-defined institutional roles, and robust accountability systems are seen as preconditions for efficient, equitable, and transparent delivery of benefits (Bassett et al., 2012; Barrientos & Hulme, 2008). As Barrientos and Hulme (2008) argue, weak governance can lead to leakages, errors, and corruption in safety net programs, undermining their impact on poverty and vulnerability. Conversely, strong governance - including features like transparent eligibility rules, coordinated administration, and effective monitoring - can improve targeting, reduce fraud, and increase public trust in social programs (Barrientos & Hulme, 2008). A body of literature has examined the governance of social protection in developing countries, often highlighting challenges such as fragmented institutional mandates, limited administrative capacity, and politicized allocation of benefits (Devereux, 2016; Kidd, 2019). In the Middle East and North Africa (MENA) region, social protection systems have historically been dominated by universal subsidy schemes and social insurance for formal

workers, with relatively weak institutions for targeted assistance and social accountability (Loewe & Westemeier, 2018; Jawad, Jones, & Messkoub, 2019). However, since the 2010s many MENA countries have launched cash transfer programs and attempted reforms to improve coordination and targeting (UN ESCWA, 2015; Selwaness & Messkoub, 2019). These efforts bring governance to the forefront, as policymakers grapple with integrating new programs into existing bureaucratic structures and ensuring these programs reach the intended beneficiaries.

In Egypt, prior to 2015, the social protection landscape was characterized by broad but shallow coverage - expensive food and fuel subsidies reaching most of the population, a patchwork of social insurance schemes covering formal workers (but leaving the informal sector largely uncovered), and a modest social assistance program (the Social Solidarity Pension) for some poor households. Scholars have noted issues such as duplication of programs, lack of a unified registry of beneficiaries, and the absence of an overarching social protection strategy (World Bank, 2015; Roushdy & Selwaness, 2019). For instance, multiple pension laws led to inequities and administrative inefficiencies in the contributory system, and the pre-2015 safety net lacked clear targeting, resulting in significant leakage of benefits to the non-poor (World Bank, 2015; Abdalla & Al-Shawarby, 2018). The introduction of the Takaful and Karama conditional and unconditional cash transfer programs in 2015, supported by the World Bank, was a turning point that brought new attention to governance issues in social assistance. Early evaluations showed that these programs achieved relatively good targeting performance – with a high share of benefits going to the poor – but they also revealed challenges in implementation, such as maintaining an up-to-date beneficiary database, communicating program rules to largely illiterate populations, and establishing grievance and oversight mechanisms in a context of low citizen trust (Breisinger et al., 2018a; Arab Reform Initiative, 2019). Similarly, the passage of Law 148/2019 for social insurance was a landmark governance reform aiming to unify the pension system’s legal framework and strengthen its financial sustainability. This reform was driven by long-standing problems, including fragmented administration, an actuarial deficit looming in the pension funds, and widespread evasion of contributions due to weak enforcement and misaligned incentives (Loewe & Westemeier, 2018; Selwaness & Barsoum, 2024).

Given these developments, recent studies have started to explore Egyptian social protection through a governance lens. Notably, Kassem (2021) employed the “Rules, Roles, Controls” framework to assess governance conditions in Egypt’s social insurance and cash transfer programs, identifying various bottlenecks at both the program (micro) level and the sector (meso) level. Her findings pointed to issues such as unclear institutional mandates between ministries, insufficient coordination mechanisms, the need for more transparent communication of program rules, and limited accountability measures (e.g. audits and community monitoring) in both types of programs. Selwaness and Messkoub (2019) also emphasize that extending coverage to informal workers in MENA countries like Egypt requires not just new policies but improved governance to enforce compliance and build trust in the system.

In summary, the literature suggests that to understand and improve social protection outcomes, one must pay close attention to governance structures. This includes examining the clarity and consistency of rules (laws, eligibility criteria, etc.), the alignment of roles among implementing agencies, and the robustness of controls such as monitoring, evaluation, and grievance redress. Our study builds on this literature by providing an updated analysis of Egypt’s social protection governance, integrating developments from 2020-2024, and offering a comparative perspective on contributory vs. non-contributory programs. In doing so, we hope to contribute to both the academic discourse on SP governance and to practical policy discussions on how Egypt can achieve a more effective and accountable social protection system.

Background: Egypt’s Social Protection System and Recent Reforms

Social protection in Egypt comprises a range of public policies and programs aimed at reducing poverty, managing social risks, and promoting social inclusion. As in many countries, Egypt’s SP system can be broadly categorized into three pillars (Loewe & Westemeier, 2018; World Bank, 2015): (1) Contributory

social insurance - schemes including pensions for old-age, disability, and survivors, as well as health and unemployment insurance, financed by payroll contributions; (2) Non-contributory social assistance, primarily poverty-targeted cash transfer programs and subsidies for food, fuel, and other basic goods, financed by general government revenues; and (3) Labor market programs - such as public works, skills training, or wage subsidies, which provide either active or passive support for employment. Historically, Egypt's social protection spending was dominated by generalized subsidies (especially on food staples and fuel) and public pensions, which together consumed a large share of the budget but did not effectively target the poor – resulting in high inclusion of the non-poor and gaps in coverage of the most vulnerable (World Bank, 2015; Abdalla & Al-Shawarby, 2018).

In the contributory pillar, the Social Insurance System (SIS) has been the primary program, covering formal sector workers (public and private) with pensions and other benefits. Prior to 2020, the SIS was governed by multiple laws – at least four major pension laws applied to different categories of workers (government employees, public enterprise workers, private sector employees, expatriate Egyptians, etc.) and managed by two separate pension funds (for public sector and private sector workers) under the Ministry of Social Solidarity's National Organization for Social Insurance (NOSI) (Loewe & Westemeier, 2018). This fragmentation led to inconsistencies (for example, differing benefit formulas and contribution rules across sectors) and administrative inefficiencies. Many categories of workers, such as informal sector laborers, casual or seasonal workers, and household domestic workers, were not mandatorily covered or remained outside the system in practice. As a result, social insurance coverage in Egypt has been low: even among regular wage employees, coverage fell from over 50% in 2009 to around 35% by 2021 in the private sector (Selwaness & Barsoum, 2024), reflecting both labor market informalization and widespread evasion of contributions. A significant development was the passage of the Social Insurance and Pensions Law No. 148 of 2019, which took effect in January 2020 and unified the various pension laws into one. Law 148 created a single statutory framework for social insurance (NOSI, 2019), extended legal coverage to previously uncovered workers (including certain categories of temporary, seasonal, and domestic workers) (NOSI, 2019), and established a National Social Insurance Authority (NSIA, replacing NOSI) to manage a consolidated pension fund for all sectors. It also introduced parametric changes such as gradually raising the retirement age to 65 by 2040, increasing the required years of contributions for pension eligibility (from 10 to 15 years), adjusting contribution rates, and adding an unemployment insurance benefit (NOSI, 2019; Mercer, 2020). These changes aimed to improve the sustainability and equity of the system. The new law significantly increased penalties for non-compliance.

In the non-contributory pillar, a major shift occurred with the launch of the *Takaful and Karama* (Solidarity and Dignity) program in 2015. *Takaful and Karama* (often abbreviated as TKP) consists of two integrated cash transfer programs: *Takaful* is a conditional cash transfer (CCT) providing monthly income support to poor households with children, contingent on school attendance and health check-ups, while *Karama* is an unconditional social pension for the elderly poor (65+), individuals with severe disabilities who cannot work, and orphans (World Bank, 2015; Ministry of Social Solidarity, 2019). The Ministry of Social Solidarity (MoSS) implements TKP, with technical and financial support from the World Bank and other partners in its initial years (World Bank, 2015). Households are targeted using a proxy means test (PMT) formula and must pass certain exclusion criteria (for example, not owning significant assets, not having a formal job or pension above a low threshold, etc.) (Ministry of Social Solidarity, 2019). Since its inception, TKP has expanded rapidly: by 2019 it covered about 2.5 million households, and by 2023 it had grown to around 4.5 million households (approximately 17–18 million individuals), after the government integrated beneficiaries of the pre-existing Social Solidarity Pension into the *Takaful and Karama* program under a 2019 “Unified Cash Transfer Law” (Ministry of Social Solidarity, 2019). As of 2024, authorities report that over 5 million households are enrolled, reflecting further scale-up in response to economic pressures and the COVID-19 pandemic (Amwal Al Ghad, 2024). The benefit levels for *Takaful* are modest: for example, a base transfer of about EGP 325 per month for a family, plus small top-ups per child in school (with slightly higher amounts for secondary-school children than primary) (Ministry of Social Solidarity, 2019). *Karama* provides a flat pension (around EGP 450–500 per month) to everyone who qualifies. Despite the low amounts, evaluations have shown that these transfers improve household welfare and food security in the short run (Breisinger et al., 2018b). The government has periodically raised the benefit amounts and budget allocation - most recently, the

FY2025/26 budget boosts TKP funding by 35% and plans a 25% increase in monthly benefit values from 2025 to cushion the impact of inflation (Amwal Al Ghad, 2024).

In addition to these two focus programs, Egypt's SP system includes other components: a universal food subsidy system (ration cards) reaching about 80% of the population, which has undergone its own governance reforms such as digitization and improved targeting since 2014; an energy subsidy reform that gradually shifted generalized subsidies to cash transfers; and several donor-supported labor market programs (e.g., the "Forsa" economic empowerment program that links TKP beneficiaries to training and employment opportunities). The government also introduced a new Universal Health Insurance Law (No. 2 of 2018) aiming to eventually provide health coverage for all Egyptians, with a pilot phase launched in 2019. These efforts indicate a broader social policy reform momentum. However, with respect to governance, fragmentation remains an issue - different ministries and agencies handle different programs, and coordination is often ad hoc. Until recently, Egypt lacked a unifying national social protection strategy or a high-level body to coordinate SP policies across sectors. A Ministerial Committee for Social Justice was formed in 2014 (European Commission, 2015), but its effectiveness has been limited by different institutional challenges.

Before the most recent wave of reforms, Egypt's social protection system faced persistent governance challenges. Accountability mechanisms were inadequate. Most programs lacked public performance reporting, independent audits were rare, and grievance systems were nearly non-existent until recently. Takaful and Karama were among the first to offer a hotline and appeals process. Capacity constraints also plagued implementation including underinvestment in staffing, training, and administrative systems led to delays, errors, and uneven service quality. A culture of data opacity further compounded these issues, limiting information sharing across agencies and with the public (Kassem, 2021). Many citizens remained unaware of their rights or program requirements. Informal workers, for instance, often misunderstood their pension entitlements, while some households were unfamiliar with the eligibility criteria or co-responsibilities associated with TKP, leading to confusion and mistrust.

Since 2020, several reforms have aimed to address these challenges. Key legislation, such as Law 148/2019 governing social insurance and the law institutionalizing TKP, laid the groundwork for systemic change. One major step was the creation of the National Social Insurance Authority (NSIA), which consolidated Egypt's pension funds and aimed to streamline administration. Meanwhile, MoSS reinforced its administrative capacity by establishing a centralized unit to manage TKP, supported by a real-time management information system tracking applications, payments, and compliance.

Service delivery has also become increasingly digitized. Social insurance payments and contributions are now processed through digital platforms, while TKP has always used electronic payment cards. In 2021, the government began issuing Meeza cards and mobile wallets to extend financial inclusion and enhance transparency. These electronic channels reduce opportunities for leakage and establish digital audit trails that strengthen administrative controls.

Progress has also been made on data integration. Egypt is in the process of building a Unified National Registry to consolidate household-level data across social programs. The existing TKP database already supports cross-checking against civil registries, pension records, and vehicle ownership files. The Administrative Control Authority has taken a leading role in managing this registry, which is expected to improve targeting and reduce duplication - such as detecting when a pensioner's household is inappropriately receiving TKP, or when an applicant has undeclared income or assets.

On the accountability front, new mechanisms are emerging. In 2018, the government mandated the formation of local oversight committees for TKP, involving community members and NGO representatives. These bodies are expected to monitor eligibility, service delivery, and compliance with program responsibilities, and serve as mediators for grievances. While their effectiveness varies and some struggle with capacity, the model represents an important step toward community-level oversight. MoSS also launched a formal grievance mechanism, including hotlines and physical service desks. Reports suggest a high-resolution rate - approximately 85–90% of filed complaints have been addressed (Ministry of Social Solidarity, 2019).

Lastly, there has been movement toward greater strategic coherence. The Ministry of Planning, in collaboration with MoSS and other agencies, has drafted a national social protection strategy within the framework of Egypt Vision 2030 and COVID-19 recovery planning. Though a dedicated social protection commission has yet to materialize, there is growing momentum behind coordinated policy approaches. Linkages are being explored between cash transfers and complementary initiatives like the Forsa employment program and Hayat Karima (Decent Life), a large-scale rural development effort. These connections currently rely on ad hoc coordination but institutionalizing them through permanent mechanisms would enhance their sustainability.

In sum, Egypt's social protection system is in a state of transition. On one hand, new rules and structures are being put in place to modernize the system (e.g. unified laws, digital systems, targeting mechanisms). On the other hand, effective governance requires that these formal changes translate into on-the-ground improvements in roles (clear mandates, better coordination) and controls (accountability, transparency, participation). The following analysis will delve into these aspects for the two case study programs, highlighting progress made and challenges remaining.

Methodology

This research employs a qualitative case study approach to analyze the governance of Egypt's social protection programs. We focus on two case studies - the social insurance pension system and the Takaful and Karama cash transfer program - examining each at both the sector (meso) level and the program (micro) level. The analysis is guided by the Rules–Roles–Controls framework described earlier, which provides a structured way to assess governance conditions. For each case, we map out: the “rules of the game”, the “roles and responsibilities”, and the “controls and accountability mechanisms”.

Originally developed by Bassett et al. (2012), the framework offers a practical lens for analyzing governance in social protection by focusing on how rules are defined and operationalized, how roles are distributed among institutions and actors, and what control mechanisms exist to enforce compliance, ensure accountability, and foster learning. The value of this framework lies in its ability to capture both the formal architecture and the operational realities of governance, highlighting where policy design and implementation diverge and offering a tool to understand the interplay of legal norms, institutional arrangements, and monitoring systems. In the context of Egypt, where reforms have shifted both legal frameworks and administrative processes in recent years, this framework facilitates a systematic comparison between programs and over time.

The study draws on both primary and secondary data sources. We conducted in-depth semi-structured interviews with key informants involved in social protection policy and administration. A total of 12 interviews were carried out in 2019–2020 with policymakers and experts, including officials from the Ministry of Social Solidarity which oversees cash transfer and subsidy programs, senior staff at the National Organization for Social Insurance, consultants from international organizations (e.g. World Bank, UNICEF) working closely with the Egyptian government on SP projects, and local researchers/experts on social policy. These elite interviews provided insider perspectives on governance challenges. Respondents were selected using purposive and snowball sampling, initial contacts led to referrals to other knowledgeable experts. All interviews were conducted under conditions of confidentiality and with informed consent, and the study was approved by the Institutional Review Board (IRB) of the American University in Cairo. When we quote or reference an “Interview” in the analysis, it refers to these anonymized discussions with experts.

We reviewed a wide range of documents and reports, including the texts of relevant laws and decrees (such as Law 148/2019 and its executive regulations, and decrees establishing TKP procedures), government strategy and policy documents, and evaluations or studies by international organizations and think tanks. Key documents included the Takaful and Karama program operational manual and mid-term reports (MoSS, 2019), World Bank project documents and IFPRI evaluation studies on TKP (Breisinger et al., 2018a), and Economic Research Forum publications on social protection in Egypt and the MENA region. We also incorporated recent statistics (e.g., number of beneficiaries, financial allocations) from official sources such as Ministry of Finance and MoSS releases, to update the status

of the programs through 2024. This mixed-data approach allows for triangulation of information.

We utilized a thematic analysis approach, coding the interview transcripts and documents according to the categories of the conceptual framework (rules, roles, controls) and emergent sub-themes within those categories. The framework was not imposed rigidly; rather, we allowed the empirical data to reveal linkages and iteratively refined our understanding of governance issues following an inductive analytic approach. Importantly, the analysis differentiates between the meso-level (overall social protection system coordination and policy environment) and the micro-level (individual program governance). The original thesis on which this paper builds was organized in this way, and we maintain that distinction where relevant - for instance, discussing how the lack of an overarching coordinating body affects both pensions and cash transfer programs (a meso-level issue), as well as program-specific governance issues unique to each scheme (micro-level issues). A macro-level analysis, for instance of fiscal policy, labor markets, or demographic trends was beyond the scope of this governance-focused study and would require a different analytical framework and data sources.

By examining two contrasting programs, we also perform a comparative analysis: identifying which governance challenges are common across both contributory and non-contributory schemes (indicating systemic issues) and which are unique to each (indicating program-specific or scheme-specific issues). For example, we compare how “rules of the game” are formulated and communicated in the pension system versus the cash transfer program, or how accountability mechanisms differ between a contributory insurance fund and a tax-financed cash benefit. This comparative lens helps highlight the diversity of governance arrangements within Egypt’s SP system and assess the extent to which recent reforms have improved governance across the board.

It should be noted that this research is largely qualitative and exploratory. We did not undertake a quantitative impact assessment of governance changes, though we cite descriptive indicators (e.g., coverage rates, error rates) where available to illustrate certain points. The focus is on process and institutional analysis. One limitation of the study is that, due to scope and data availability, it concentrates on two major programs and thus may not capture governance issues in other SP programs (such as food subsidies or public works). However, given that pensions and Takaful/Karama are among the largest and most reformed programs, it is reasonable to assume that many governance lessons from these cases apply more broadly. Another limitation is that the primary data (interviews) were collected mostly in 2019–2020, which means they may not fully reflect very recent changes; to mitigate this, we supplemented interview insights with recent literature to ensure our analysis reflects current conditions. All evidence from interviews has been cross-checked with secondary sources or, when used directly, is presented with context.

In the next sections, we proceed with the case study findings. We first present the governance analysis of the social insurance system, followed by the governance analysis of the Takaful and Karama program, each structured around the rules, roles, and controls dimensions.

Governance of the Social Insurance System

The contributory social insurance system in Egypt is a cornerstone of the national social protection architecture. It is designed as a contributory arrangement in which workers and employers pay during working years to finance pensions and related benefits, including old age, disability and survivors’ pensions, with more limited unemployment and work injury provisions. Governance of this system is critical because it involves long term financial commitments, shapes labour market behaviour, and provides income security for millions of Egyptians. Law 148 of 2019 marked a major attempt to rationalise rules, clarify roles and strengthen controls, yet implementation challenges remain significant.

Law 148 introduced a unified legal framework to replace the previous patchwork of social insurance laws that had applied to different categories such as government employees, public enterprise workers and private sector employees, often with divergent benefit formulas and retirement ages. This fragmentation had created inconsistencies and perceived inequities, as noted by one interviewee who stressed that people in similar jobs could retire with very different pensions depending on which law

covered them. The new law established a single rulebook for all formal sector workers. It set a gradually rising retirement age, reaching sixty-five by 2040, and increased the minimum contribution period for pension eligibility from ten to fifteen years. It unified contribution rates, initially twelve per cent of wages by employers and nine per cent by employees, with a planned increase to a combined twenty six per cent and crucially introduced the concept of the global salary so that contributions are calculated on the full wage rather than only on a basic component. The law set a benefit formula intended to improve adequacy and fairness, with pensions required to be at least sixty-five per cent of the official minimum wage and capped at eighty per cent of a reference wage, and annual pension increases indexed up to fifteen per cent subject to the financial position of the fund (Mercer, 2020). It also introduced unemployment insurance for formal workers, financed by a one per cent employer contribution, addressing a previous gap. Coverage was legally extended to groups that had been hard to reach, including seasonal labourers, domestic workers and some categories of informal and self-employed workers, who can now enrol on a voluntary basis. At the same time, enforcement provisions were significantly strengthened. Employers who fail to register workers or under report wages now face substantial fines and possible imprisonment, compared to the negligible penalties that existed before, and workers who provide false information can also be sanctioned.

These stronger rules were designed to respond to long standing governance weaknesses, particularly widespread evasion and under reporting of wages. Under the previous system, more than half of workers were estimated to declare artificially low salaries for social insurance purposes, which undermined both fund finances and future benefit adequacy (Barsoum and Selwaness, 2022). By broadening the contributory wage base and sharply increasing the minimum insurable wage, which is indexed to inflation, Law 148 seeks to enforce more accurate reporting. However, recent analysis notes that this higher minimum insurable wage has also raised contribution costs for low-income workers, which could discourage participation if enforcement is not consistently applied (Selwaness and Barsoum, 2024). The legal framework is therefore more robust, but outcomes depend heavily on compliance capacity. Coverage of informal workers remains a central challenge. Traditionally, only those in formal employment were required or incentivised to participate in social insurance. Although Law 148 opened a pathway for informal and self-employed workers to join voluntarily, without a binding obligation or strong incentives most remain outside. As of 2022, only around four in ten members of the labour force were actively contributing to social insurance, leaving the majority without formal old age security (Roushdy and Selwaness, 2019). Many informal earners view registration procedures as burdensome and contributions as difficult to sustain given irregular incomes. Experts interviewed suggested that bridging this gap would require not only legal inclusion but also tailored financial incentives and simplified procedures to make participation more attractive.

Communication and clarity of rules have been another weak point. Effective governance requires that participants understand their rights and obligations. Interview evidence indicates that social insurance awareness in Egypt is limited. One expert described a general lack of social insurance awareness, noting that many workers do not fully understand how pensions are calculated or why continuous, accurately reported contributions matter over decades. Historically, the state invested little in communication, often if employers or unions would inform workers. When Law 148 was introduced, there were no large-scale public education campaigns, and information was mostly confined to media reporting. This stands in contrast to the Takaful and Karama cash transfer programme, where the Ministry of Social Solidarity engaged in door-to-door outreach to explain programme rules, albeit with mixed effectiveness. In pensions, interviewees argued for more proactive and sustained communication through radio, social media, workplaces and simple brochures, alongside greater transparency at the individual level, such as providing contributors with regular statements of their accumulated rights. A senior official from the pension authority underlined that many workers are unaware of their entitlements, which can erode confidence in the system. Without improving information flows, even well-designed rules risk remaining underused.

The unification of laws under Law 148 significantly improved internal consistency and perceived fairness. A government official highlighted that the new system unified contributions and introduced the global salary in a way that reduced confusion. However, consistent implementation is still evolving. Detailed regulations were required to operationalise various provisions, including investment rules for the pension fund, and some of these remained under refinement as of 2021. Transitional arrangements

also complicate perceptions of fairness. Workers who had already retired or were close to retirement when the law came into force remain under the previous rules to safeguard acquired rights. This creates, for a time, two groups of pensioners governed by different formulas and indexation rules. While this is necessary to avoid retroactive changes, it can generate concerns among older retirees about relative treatment. Over the long term the unified rules will cover many contributors and beneficiaries, simplifying governance. The authorities have discussed providing targeted support to facilitate participation of specific groups such as small farmers or casual workers, for example by subsidising contributions, but have so far been cautious about proliferating special regimes that could re-introduce complexity.

Institutional roles and responsibilities were also reshaped by the 2019 reforms. The National Social Insurance Authority was established as the unified administrator of pensions and social insurance nationwide, merging separate public sector and private sector funds into a single entity under the policy oversight of the Ministry of Social Solidarity. This consolidation was intended to improve efficiency and facilitate pooling of resources. The Ministry of Finance retains a central role in financing. Historically, MoF utilised pension surpluses to support the government budget and accumulated a substantial liability to the pension system, which created tension and limited trust between the social insurance administration and MoF. An interviewee from within the pension organisation explained that budgets were prepared and sent to MoF, but accountability for fulfilling social insurance obligations was not always clear and coordination took a long time. Law 148 sought to clarify this relationship by requiring MoF to transfer a fixed share of general revenues annually to the pension fund and to follow an agreed schedule to repay inherited liabilities. A landmark agreement in 2019 recognised and began repayment of around one hundred and sixty billion Egyptian pounds owed to the pension system. The law also strengthened the role of the NSIA board in overseeing investment decisions. These measures have improved the formal framework, but NSIA continues to depend on MoF for certain key decisions, reflecting an ongoing asymmetry in power. Some interviewees suggested that a more independent oversight body or clearer accountability arrangements could further strengthen this dimension of governance.

At local level, social insurance services are delivered through a network of offices across governorates and districts, which enrol workers, collect contributions and process claims. These offices are the citizen facing part of the system. Historically, they have suffered from staff shortages, complex procedures and delays, contributing to public frustration. Retirees often reported having to make repeated visits to finalise paperwork. Under NSIA, work is underway to modernise information systems and, where appropriate, consolidate smaller offices. Yet the underlying human resource constraints remain substantial. Interviews highlighted a shortage of adequately trained personnel, limited opportunities for professional development and an ageing workforce due to recruitment constraints since around 2014. A policy advisor noted that staff numbers are insufficient and that existing employees have limited incentives to upgrade skills. Another expert observed that, as recruitment has been restricted, agencies have come to rely more on consultants. A governance assessment in 2021 identified the lack of qualified personnel, lack of training and overall staff deficits as key constraints. The wider public sector performance management system offers few performance based incentives. Promotions are largely driven by tenure, and salary scales provide limited differentiation based on performance. One retired official remarked that employees were expected to work out of altruism rather than incentives, reflecting a culture in which going beyond minimum requirements is not systematically recognised. This points to the need for broader civil service reform to introduce clearer performance frameworks and incentives that support innovation and better service delivery.

To bridge capacity gaps, MoSS and NSIA have made use of outsourcing and consultants. External expertise has been contracted for tasks such as developing new management information systems, where a government affiliated technology company, e-Finance, built the pension platform, and for actuarial analysis and reform design. Partnerships with Egypt Post and e-Finance have supported more efficient and transparent benefit payments through electronic cards, reducing opportunities for leakage. This entrepreneurial use of external partners has enabled reforms that might otherwise have been difficult for existing administrative structures to implement. At the same time, heavy reliance on consultants for core functions such as policy design and monitoring raises concerns about sustainability if knowledge is not transferred to permanent staff. Several interviewees cautioned that consultants should work with staff rather than instead of staff, with an explicit focus on capacity building. Law 148

acknowledges these needs by mandating the creation of a Financial Investment Unit within NSIA to professionalise fund management and by requiring periodic actuarial evaluations, which can help institutionalise specialised expertise rather than rely solely on ad hoc arrangements.

Controls and accountability mechanisms have been strengthened but remain a work in progress. In the past, enforcement capacity was limited, with too few inspectors to monitor employers, low penalties and a large informal economy operating outside the system. Employers commonly under reported wages to reduce contribution obligations, and there was no reliable mechanism to verify information in real time. Law 148 tightened penalties for non-compliance and emphasised detection through improved data sharing and coordination between NSIA and entities such as the tax authority and commercial registries. The development of a Unified National Registry that links multiple databases is central to this approach. The merger of funds under NSIA also reduced fragmentation in the inspection function, which had created gaps in coverage. Nevertheless, interview data indicate that inspectors still face integrity risks and have limited performance incentives. Some may be vulnerable to undue influence given modest salaries, and historically there has been little recognition for identifying substantial non-compliance. Experts proposed complementing traditional inspection with greater use of data analytics and, in some cases, independent audits to identify evasion, thereby reducing reliance on purely manual checks.

Digitisation has emerged as a particularly important control. Moving contribution records and pension payments to electronic platforms has reduced opportunities for error and manipulation. Linking the pension database to the national civil registry has helped to address cases where pensions continued to be withdrawn after a beneficiary's death. Shifting to electronic payments through banks and postal cards has reduced the need for retirees to queue at local offices and has limited opportunities for informal payments, while creating clear digital records of all transactions. Governance assessments identify these measures as among the most effective programme level safeguards.

Monitoring and evaluation of the pension system have historically been limited, in contrast to donor financed programmes like Takaful and Karama that have been subject to rigorous external evaluations. Law 148 now requires regular actuarial valuations and annual financial reports to Parliament, which introduces a more systematic review of sustainability and opens finances to legislative scrutiny. Within NSIA and MoSS there is also growing recognition of the need to track key performance indicators such as coverage rates, collection efficiency and claim processing times. Proposals to develop an internal dashboard have been put forward, although implementation is at an early stage. Independent evaluations of service quality or operational efficiency remain rare, and collaboration with research institutions could help fill this gap by assessing, for instance, the impact of enforcement reforms on compliance or retiree experiences with service delivery.

Transparency is improving but still constrained by a culture of data secrecy. In the past, contributors and beneficiaries had limited access to information about their entitlements or the overall financial position of the system. Digitisation is gradually allowing contributors to access their records through electronic channels. At the macro level, recent state budgets have begun to present pension related expenditures and transfers explicitly, which increases visibility. Data integration via the national identification number also supports cross programme checks and more transparent coordination. However, public sector norms continue to favour restricting data sharing, even within government, due to confidentiality concerns and sensitivity about external scrutiny. Enhancing transparency further, for example by publishing an annual report on the pension system's performance and by releasing summaries of audits by the Central Auditing Organization, would strengthen accountability and help build trust among contributors.

Grievance redress and social accountability are evolving areas. Historically, pension related grievances over benefit calculation or delays often required lengthy administrative or judicial processes, and there was no easily accessible mechanism dedicated to pensions. Drawing on experience from Takaful and Karama, MoSS and NSIA have established customer service centres and hotlines where retirees can seek information or lodge complaints, and simple issues are increasingly resolved in a timely manner. Awareness of these channels remains limited, and more communication is needed so that contributors and pensioners know how to verify their records and raise concerns before retirement. Social accountability mechanisms, such as systematic engagement with labour unions and retiree

associations, are still limited, although worker and employer representation on the NSIA board provides a formal avenue for stakeholder input. Involving such groups more actively in oversight and gathering feedback through surveys or consultations could help identify implementation problems that top-down monitoring might miss.

Overall, governance of the pension system in Egypt has moved substantially towards a more coherent rule base and clearer institutional framework with Law 148 of 2019. The law unified rules strengthened enforcement instruments and clarified the financial relationship between NSIA and the Ministry of Finance. At the same time, the system still faces significant challenges related to coverage of informal workers, administrative capacity, effective enforcement, transparency and trust. Building a sustainable and credible pension system will require continued investment in implementation capacity, more systematic use of data and evaluation, stronger integrity and incentive frameworks for enforcement, and deeper engagement with contributors and beneficiaries. If these elements are developed, the reforms already in place can support an efficient, equitable and accountable pension system that underpins social protection in Egypt over the long term.

Governance of the Takaful and Karama Cash Transfer Program

The Takaful and Karama Programme (TKP) is Egypt's flagship non-contributory cash transfer scheme targeting households with limited income and vulnerable individuals. Launched in 2015, it represented a shift from broad, regressive subsidies and a small legacy social pension towards a more targeted, data-driven approach to social assistance (World Bank, 2015). TKP expanded rapidly, reaching millions of households within a few years, and has since undergone several rounds of adjustment. Its trajectory offers a useful lens for examining how rules, institutional roles and control mechanisms were designed and then stress-tested in implementation up to 2024 (Kassem, 2021).

TKP was built around clear eligibility and targeting rules. It consists of two components: Takaful, which provides monthly transfers to low-income households with children conditional on school attendance and regular health visits; and Karama, an unconditional social pension for older persons with limited income, persons with severe disabilities that limit their ability to work, and orphans (World Bank, 2015). Both rely on a proxy means test (PMT) that scores households using information on assets, housing conditions, demographics and education, combined with categorical criteria and exclusion filters, such as car ownership or significant landholdings. Geographical targeting was used at the outset, with roll-out beginning in governorates with high poverty rates before scaling nationally (IFPRI, 2018). Benefit parameters were explicitly pro-poor: Takaful pays a base transfer plus child-linked amounts, with higher values for older students to support school retention, while Karama provides a flat stipend for eligible individuals. Transfers are typically paid to women in the household to strengthen their role in managing family welfare, in line with global practice on gender-sensitive cash transfers (World Bank, 2015).

An important governance innovation was that TKP's rules were written down, standardised and publicised, in contrast to older programmes that often relied on implicit or discretionary criteria. With World Bank support, the Ministry of Social Solidarity (MoSS) produced operational manuals and simple brochures explaining eligibility conditions, documentation requirements and how to apply. This gave front-line staff clearer guidance for screening applications and offered communities a reference point for who should qualify, which enhanced transparency (World Bank, 2015; Kassem, 2021). Conditionality for Takaful was also clearly defined in policy – minimum school attendance and scheduled health check-ups – though enforcement was phased in. Early on, conditions were not systematically monitored, leading some families to doubt they would matter in practice. By 2018, MoSS had established a mechanism to check school attendance and clinic visits and began issuing warnings and temporary suspensions in cases of repeated non-compliance, accompanied by communication campaigns underlining parental responsibilities for children's human capital (IFPRI, 2018).

At the same time, TKP's targeting model has had to navigate the tension between technical sophistication and public comprehensibility. The PMT methodology is complex by design: it uses survey-

based weights and thresholds to approximate living standards and to minimise leakage to better-off households. However, this complexity makes it difficult for applicants to understand how decisions are reached. Many households reported being told that “the computer” decided their eligibility without understanding the underlying logic, which sometimes undermined perceptions of fairness (Kassem, 2021). When the PMT formula and cut-off score were updated to reflect new data or rising prices, some households lost eligibility despite no change in their own behaviour, fuelling concerns that rules were shifting. Officials acknowledged that PMT revisions “create confusion” at community level. MoSS sought to manage this tension through periodic re-certification campaigns, improved communication, and the establishment of a grievance mechanism that allowed contested decisions to be reviewed, but the trade-off between adaptive targeting and perceived stability remains a recurrent governance challenge (IFPRI, 2018; Kassem, 2021).

Communication and outreach were a central part of TKP’s governance model, but effectiveness was uneven. MoSS, supported by development partners, mounted door-to-door campaigns, community meetings and media outreach during roll-out. Social workers visited villages to explain the programme and assist households in completing applications; local radio and television were used to raise awareness. Over time, word-of-mouth among beneficiaries also played a role in spreading information (World Bank, 2015). Nonetheless, field research found that substantial numbers of low-income households, especially in remote or marginalised areas, were initially unaware of the programme or unclear on how to access it (Kassem, 2021). Limited transport budgets and staff workloads constrained the reach of door-to-door efforts, and literacy barriers reduced the impact of written materials. Later rule changes, such as extending Karama to orphans in 2017, were not always consistently communicated, meaning that some eligible children were only enrolled with delay. These experiences pushed MoSS to diversify channels, including using local leaders, religious institutions and radio in local dialects, and to treat communication as a continuous function rather than a one-off launch activity (Kassem, 2021).

Independent evaluations provide a more objective view of TKP’s fairness and targeting performance. Impact and process assessments conducted by IFPRI and others found that TKP performs relatively well by international standards: in early evaluations, inclusion error (non-poor households receiving benefits) was in single digits, and a substantial share of transfers accrued to households in the bottom income deciles (IFPRI, 2018). Exclusion error remained higher, with many eligible households not yet covered, which is typical for programmes still scaling up. At community level, however, perceptions are shaped by visible cases. Households that are just above the PMT threshold but feel poor relative to their neighbours often regard their exclusion as unfair and may attribute it to local bias, even when decisions are algorithm-based. There were also isolated reports of informal payments or favouritism in application support, though systematic evidence of large-scale malpractice is limited (Kassem, 2021). TKP’s design attempted to mitigate these risks through electronic cross-checks and centralised scoring, combined with some community level transparency, such as public posting of beneficiary lists in certain areas, which allowed local actors to flag clearly ineligible cases.

TKP also had to manage legacy overlap with the older Social Solidarity Pension, a small cash transfer for older persons and widows that predated the programme. For several years, the two schemes co-existed, creating confusion among beneficiaries and some cases of double coverage. Governance reviews noted that households were sometimes unclear whether Karama was a top-up or a replacement, and local offices had to manage parallel rules and systems (Kassem, 2021). The decision to integrate the legacy scheme into TKP and migrate its roughly 1.2 million beneficiaries into the Karama component by 2019 simplified the landscape and removed duplication, mirroring the logic of unifying fragmented pension laws. Though the transition required careful communication and data cleaning, it ultimately strengthened consistency and created a single, coherent social pension pillar (World Bank, 2020).

Institutionally, TKP is centrally anchored in the Ministry of Social Solidarity, which is a governance strength. MoSS is responsible for policy, programme design, budgeting, management of the Management Information System (MIS) and overall monitoring and evaluation. Implementation relies on MoSS’s nationwide network of Social Units at village and neighbourhood level and governorate directorates at intermediate level. Local social units register applicants, verify documentation, conduct

home visits, and interact with beneficiaries; governorate offices supervise implementation, consolidate reports and act as an escalation level for grievances; the central TKP unit manages the MIS, runs the PMT, issues payment orders and coordinates with other ministries and partners (Kassem, 2021; World Bank, 2015). This vertical structure provides a clear chain of command and limits fragmentation, although it also concentrates responsibility on MoSS for programme performance.

International partners have been embedded in TKP's ecosystem from the beginning. The World Bank's financial and technical support shaped the overall design, PMT methodology, MIS architecture and monitoring framework (World Bank, 2015). UNICEF, WFP and others contributed to community outreach, social worker training and complementary interventions such as nutrition education. IFPRI provided independent impact evaluation, creating an external feedback loop. The Administrative Control Authority (ACA) and the agency managing the Unified National Registry play a key role in verifying data through cross-checks with other government systems (World Bank, 2020). This multi-actor configuration brought in expertise and resources but required MoSS to exercise coordination and retain ownership. Interviews suggest that, overall, MoSS maintained control over decision-making while using donor-financed technical assistance to fill capacity gaps and accelerate reforms (Kassem, 2021).

Implementation capacity at the front line has been a recurring constraint. Social units faced very high caseloads during the initial application waves, with social workers having to process large numbers of forms, learn new software and conduct home visits, often in challenging conditions. Many staff came from a background of administering smaller, more discretionary programmes and had limited exposure to data-driven systems. This resulted in processing backlogs and some data quality issues in the early stages (IFPRI, 2018). Over time, MoSS invested in training, simplified procedures and recruited project-funded staff, including younger personnel with stronger IT skills, to support local units. A culture shift was also required: some social workers expressed discomfort with relying on a formula that could reject households they personally considered poor, feeling that their discretion was being constrained (Kassem, 2021). MoSS leadership emphasised that objective rules increase fairness and that staff roles focus on accurate data collection, respectful engagement with applicants and ensuring compliance with conditions, rather than making subjective eligibility judgements. Continued training and change management have been necessary to consolidate this shift.

A core governance asset of TKP is its comprehensive MIS, which supports application processing, eligibility decisions, payments, updates and reporting. All applications are entered into a single electronic system that records each step, from registration and PMT scoring to payment issuance. Each action is associated with a user account and timestamp, enabling performance monitoring and audit trails (World Bank, 2015). The MIS is integrated with national databases through the Unified National Registry, allowing systematic cross-checks against civil registration, social insurance, vehicle registration and other administrative sources. This integration has enabled MoSS to identify and remove ineligible beneficiaries, such as individuals with undisclosed formal employment or significant assets inconsistent with programme criteria. A major data-cleaning exercise in 2018–2019 led to the exit of tens of thousands of cases that no longer met eligibility conditions, illustrating the value of ongoing data validation for safeguarding programme integrity (World Bank, 2020; Kassem, 2021).

Payment processes have also been structured to reduce risks and improve accountability. Rather than social workers handling cash, TKP uses Egypt Post and electronic payment cards linked to bank or postal accounts to deliver transfers, relying on the country's extensive postal and financial infrastructure. This separation between enrolment functions (handled by MoSS) and payment functions (handled by specialised agencies such as Egypt Post and e-Finance) reduces opportunities for mismanagement and provides beneficiaries with more secure and predictable access to funds (World Bank, 2015). Electronic payments create a digital record of each transaction, which is important for auditability and for analysing payment performance.

Monitoring and evaluation arrangements for TKP are stronger than for most previous social programmes in Egypt. Routine administrative data generated by the MIS enables MoSS to track key indicators such as the number of beneficiaries, payment punctuality, processing times and compliance with conditionality. The World Bank's results framework requires regular reporting on these metrics

(World Bank, 2015). Impact evaluations conducted by IFPRI found positive effects on consumption, food security and schooling outcomes among beneficiary households, and limited evidence of adverse labour market effects (IFPRI, 2018). These findings have informed policy decisions, including adjustments to benefit levels and design. In addition, third-party spot-check verification by an international firm was used in the early years to validate the accuracy of the registry and the quality of local implementation (Kassem, 2021). Although this intensive model of external monitoring was not sustained systematically, it set a precedent for using independent assessments as part of the control environment.

TKP's grievance redress mechanism is another distinctive governance feature. Recognising that a formula-based system would inevitably generate errors and contentious cases, MoSS established multiple channels for grievances, including a hotline, web portal and in-person submission at social units (World Bank, 2015). Households can appeal decisions, report perceived errors or lodge complaints about service quality. MoSS has reported high resolution rates for grievances, often above eighty per cent, with many cases leading to corrections where information was incomplete or where a recent shock had altered a household's situation (World Bank, 2020). The grievance mechanism not only increases fairness for individuals but also generates aggregate intelligence on recurring issues, such as frequent appeals from specific districts or around particular exclusion criteria. A continuing issue has been awareness: research indicates that many potential beneficiaries and some existing recipients did not initially know that they could appeal or were unsure how to do so, especially in areas with limited connectivity or literacy (Kassem, 2021). Expanding communication about the grievance system and simplifying access are therefore ongoing priorities.

Perhaps the most innovative dimension of TKP's accountability framework is the use of social accountability tools. With support from NGOs and partners, MoSS piloted Community Accountability Committees in several governorates from 2018 onwards. These committees typically comprised a mix of beneficiaries, non-beneficiaries, community leaders and civil society representatives, and were mandated to monitor aspects of programme implementation, provide feedback on service quality and channel community concerns to MoSS officials (Kassem, 2021). In some governorates, particularly in Upper Egypt, committees identified cases where households did not appear to meet eligibility criteria and reported them for review, leading to programme corrections. They also highlighted service delivery issues, such as long waiting times at social units. However, the pilots also revealed challenges. In certain communities, committee members encountered resistance or discomfort from neighbours who were wary of peers commenting on their eligibility, and some committee members felt that feedback loops were not always transparent or timely. Sustaining these committees has required continuing support, clear communication that their role includes supporting beneficiaries in accessing their rights, and recognition of their contributions. The experiment nonetheless marks a significant attempt to institutionalise citizen participation in oversight of a large-scale social assistance programme.

In terms of transparency, TKP has set new benchmarks in the Egyptian context. MoSS and its partners have publicly communicated key aggregated statistics on coverage and budget, often through press releases and public events. While some technical elements, such as the exact PMT weighting, remain confidential to reduce the risk of gaming, the broad eligibility rules, application procedures and conditionality requirements are known and accessible (World Bank, 2015). Internally, dashboards and periodic reports give managers at different levels a clear view of programme performance. A logical next step, identified in governance analyses, would be the publication of a regular annual report on TKP's performance, including data on grievances, audits and evaluation findings, which would further enhance transparency vis-à-vis Parliament and the public (World Bank, 2020; Kassem, 2021).

Overall, the governance architecture of TKP represents a significant modernisation of social assistance in Egypt. Clear rules, a unified institutional home in MoSS, a robust MIS with integrated data checks, well-defined payment arrangements, a functioning grievance system, and emerging social accountability mechanisms have strengthened integrity and performance relative to past practice. At the same time, challenges remain around extending coverage to all eligible households, sustaining administrative and analytical capacity as donor support tapers off, communicating complex targeting rules in an accessible way, and consolidating community engagement without exacerbating local tensions. Continued investment in staff skills, data systems, independent evaluation and

communication with beneficiaries and local stakeholders will be essential to sustaining TKP's gains and ensuring that it remains a credible, equitable and accountable pillar of Egypt's social protection system.

Comparative Discussion: Governance Challenges and Lessons Across Pensions and Cash Transfers

Having analysed the contributory pension system and the Takaful and Karama Programme (TKP) separately, this section compares their governance arrangements and draws out shared constraints and lessons. Looking across both schemes highlights how legacy fragmentation, uneven coordination, capacity constraints and incomplete accountability arrangements shape social protection delivery in Egypt, while also revealing reform opportunities generated by recent legal, institutional and technological changes (Kassem, 2021; World Bank, 2015).

Historically, fragmentation has been a defining characteristic of the contributory system, whereas TKP was explicitly designed to consolidate previously scattered social assistance schemes. For pensions, multiple laws and separate funds for public and private sector workers created parallel bureaucracies and overlapping rules that undermined clarity and administrative efficiency. Law 148 of 2019 marked a structural shift by unifying contributory laws and merging the main funds under the National Social Insurance Authority (NSIA), which operates under the Ministry of Social Solidarity (MoSS) (World Bank, 2020; Loewe and Westemeier, 2018). This reduced legal and institutional fragmentation but did not fully resolve coordination tensions with the Ministry of Finance, which retains significant influence over fund management and financing arrangements. By contrast, TKP was introduced as a single national programme that gradually absorbed the legacy Social Solidarity Pension and replaced smaller cash initiatives. It also relied from the outset on the Unified National Registry to align with other social programmes such as food subsidies and health insurance (World Bank, 2015; Breisinger et al., 2018a). Yet, at system level both contributory and non-contributory schemes still operate in silos, with only partial data integration and limited policy linkages between them. There is, for example, no systematic pathway that links TKP exit to enrolment in social insurance when households gain formal employment; transitions are managed reactively through database cross-checks rather than through a proactive integrative strategy (Kassem, 2021).

Legal and policy frameworks have evolved in different ways across the two programmes. Pension governance has been reshaped through a comprehensive legislative reform that standardised rules and strengthened enforcement tools, including unified contribution rates, a gradual increase in retirement age and clearer financial commitments between NSIA and the Ministry of Finance (World Bank, 2020). This top-down legal approach has the advantage of predictability and stability, which is important for an insurance scheme with long time horizons, but it also reduces flexibility. Adjusting parameters such as contribution rates or retirement age requires legislative amendment, which is politically and procedurally demanding. In contrast, TKP was initially launched through cabinet decisions and detailed programme regulations, with its governance framework anchored over time in a unified cash transfer law and in binding arrangements under international financing agreements (World Bank, 2015). This more flexible policy architecture allows TKP to adjust its operational rules relatively quickly via ministerial decrees, for instance by revising the proxy means test threshold, expanding categorical eligibility or adjusting benefit levels in response to inflation or crises, as happened during the COVID-19 response and subsequent inflationary shocks (World Bank, 2020). The comparative insight is that contributory systems benefit from legal stability, whereas targeted social assistance requires operational agility; the challenge is to preserve TKP's adaptability while ensuring that changes remain transparent, rules-based and technically grounded rather than discretionary.

Institutional capacity and human resources challenges are pervasive across both schemes but manifest differently. The pension administration is characterised by an ageing civil service workforce, limited recruitment over the past decade and entrenched bureaucratic norms that slow the adoption of new practices. Implementation of reforms such as stricter enforcement of contribution rules or improved client services is constrained by shortages of inspectors, limited training and weak performance incentives (Kassem, 2021). In TKP, a new central unit within MoSS was able to recruit project-funded

staff and leverage intensive training and technical assistance, which created pockets of higher capacity, particularly around data management and monitoring. However, the programme still relies on the legacy network of Social Units, where many social workers initially lacked the digital skills and experience required to operate a rules-based, MIS-driven programme at scale (World Bank, 2015). Both systems process large volumes: the pension scheme manages records for millions of contributors and beneficiaries, and TKP received millions of applications in its first years. In both cases, limited staffing and underdeveloped performance management contribute to backlogs and variability in service quality. Cross-cutting lessons emphasise the need to invest in continuous training, recruit new profiles, and introduce performance-based incentives to shift away from purely seniority-based advancement (Kassem, 2021).

Accountability and oversight mechanisms have improved but remain incomplete. In the pension system, Law 148 introduced requirements for regular actuarial reviews and annual financial reporting to Parliament, and NSIA's board now formally includes representatives of workers and employers, which is aligned with international good practice for contributory schemes (World Bank, 2020). However, financial oversight remains largely internal; audit findings from the Central Auditing Organization are not routinely published, and there is no established practice of external independent reviews of fund management or service quality. For TKP, external accountability has been more pronounced, partly because of donor financing. The World Bank and other partners embedded detailed results frameworks, disbursement-linked indicators and independent impact evaluations, which increased transparency around programme performance and created incentives for MoSS to meet agreed milestones (IFPRI, 2018; World Bank, 2015). TKP also introduced a relatively sophisticated grievance redress mechanism and began piloting community accountability committees, which give beneficiaries and community representatives a more direct channel to raise concerns and monitor implementation (Kassem, 2021). In comparative perspective, the non-contributory programme has moved further towards participatory and evidence-based accountability than the contributory system, where contributors' organised voice on governance issues remains weak. A shared gap across both is the absence of institutionalised, publicly accessible annual reporting that would bring together coverage, financial, operational and grievance data in a consolidated format.

Technology and information systems are central to governance improvements in both programmes. The pension system has progressively shifted to electronic payments and begun integrating administrative databases using the national identification number, reducing opportunities for fraud such as duplicate or "ghost" pensions and facilitating more accurate record-keeping (World Bank, 2020). Yet, legacy data and software issues mean that full digitisation is still a work in progress, especially for older cohorts. TKP, by contrast, was able to design a comprehensive Management Information System from scratch, integrating application intake, proxy means test scoring, case management, payment orders and reporting. The TKP MIS is directly linked to the Unified National Registry and to other sectoral databases, allowing systematic cross-checks that have been used to clean the registry and remove ineligible cases (Breisinger et al., 2018a; World Bank, 2015). This demonstrates the governance gains of investing early in robust digital infrastructure for social programmes. The obvious next step is deeper integration of systems across contributory and non-contributory schemes, so that policy makers can see, for each individual and household, which social protection instruments they access and where gaps remain, and so that compliance and targeting can be managed in a coherent way (Jawad et al., 2019; Kassem, 2021).

Cultural attitudes and trust shape performance in ways that formal rules cannot fully address. The pension system has suffered from a long-standing trust deficit among contributors, driven by historical episodes of benefit erosion and perceptions that pension funds were used to finance government spending rather than being managed independently for contributors' benefit (Loewe and Westemeier, 2018). This distrust can dampen compliance, as some workers see social insurance contributions as a tax with uncertain returns and thus seek to remain informal or under-report wages. Restoring confidence requires not only legal guarantees and indexation rules but visible, sustained delivery of adequate and timely benefits, more openness about fund management and communication that addresses contributors' concerns directly. TKP, as a newer programme, did not inherit the same historical baggage but had to overcome scepticism among low-income households who were accustomed to underperforming or short-lived initiatives. As monthly transfers were delivered reliably and the

programme expanded and survived beyond the initial donor project, its credibility increased, and it began to be perceived as a core element of the state's social contract with low-income citizens (IFPRI, 2018; Kassem, 2021). In both schemes, governance reforms will gain traction only if they are accompanied by deliberate efforts to build and maintain trust through transparency, responsiveness to grievances and clear communication of results.

Sustainability and adaptability present distinct but related governance challenges. For pensions, long-term financial sustainability is paramount. Law 148 seeks to improve solvency through parametric adjustments and by clarifying the state's financial obligations. However, without sustained progress in expanding contributory coverage among workers currently in informal or precarious employment, the system will continue to depend heavily on public subsidies (World Bank, 2020). Governance reforms therefore need to couple enforcement improvements with positive incentives, such as subsidised contributions for low-income self-employed workers or simplified enrolment channels, potentially drawing on insights from TKP's outreach to households outside formal employment (Kassem, 2021). TKP's sustainability hinges on fiscal space and political commitment: as a non-contributory programme funded from general revenues, it competes with other priorities. The government has significantly increased TKP's budget in recent years, particularly in response to economic shocks, indicating strong political support (Amwal Al Ghad, 2024). Maintaining this support will depend on continued demonstration of tangible poverty and human development impacts and on keeping targeting sharp so that resources remain focused on those with the lowest incomes. Both programmes also face political sustainability questions: pension reforms can generate discontent if middle-income contributors perceive themselves as worse off, while TKP must avoid being framed as a tool of patronage or dependency rather than a rights-based safety net.

Errors, fraud and corruption take different forms but are central to governance in both cases. In the pension system, the dominant issue is contribution evasion by employers and under-reporting of wages. Strengthened legal penalties and emerging data integration with tax and labour inspectorates create the potential for more effective detection, but operational enforcement remains constrained by limited inspector numbers, weak incentives and residual corruption risks (Kassem, 2021). In TKP, the main risks are misrepresentation by applicants and potential collusion at local level. Here, the design of processes around an integrated MIS, automated cross-checks and centralised approval has substantially reduced discretion and limited opportunities for capture, and community monitoring pilots have added an additional layer in some areas (Breisinger et al., 2018a). Both systems have successfully reduced risks associated with cash handling by moving to electronic payments. Lessons are bidirectional: TKP's data-driven verification mechanisms and social accountability tools can inform more targeted and transparent enforcement for social insurance, while the contributory system's focus on long-term financial risk management can guide thinking about how TKP balances adequacy and affordability over time.

Taken together, the comparative analysis underscores several systemic governance priorities. Coordination between contributory and non-contributory programmes remains limited, suggesting the need for a high-level social protection council or similar mechanism that aligns strategy, data and delivery across schemes (Kassem, 2021; World Bank, 2015). Capacity constraints in both systems highlight the importance of investing in human resources, modernising administrative practices and embedding performance management. Accountability can be strengthened by institutionalising independent evaluations and public reporting, building on TKP's experience with impact assessments and on emerging requirements for actuarial reviews in pensions. Technological gains should be consolidated through further integration of management information systems, while cultural and trust deficits require consistent communication and stakeholder engagement. Ultimately, although pensions and cash transfers operate under different logics and time horizons, the core governance principles of clear rules, well-structured roles, effective controls and meaningful participation apply to both, and cross-learning between the two domains could significantly enhance the overall performance of Egypt's social protection system.

Table 1. Summary of governance conditions and challenges in pensions and TKP across rules, roles and controls

Dimension	Pensions (contributory social insurance)	TKP (non-contributory cash transfers)	Cross-cutting lessons
Rules and legal framework	Historically fragmented across multiple laws and funds; Law 148/2019 unifies rules, standardises parameters and strengthens enforcement, but adjustments require legislative change and remain relatively inflexible (Loewe and Westemeier, 2018; World Bank, 2020).	Launched through cabinet decisions and detailed programme regulations, later anchored in unified cash transfer legislation; rules are data-driven and can be adjusted more rapidly through ministerial decrees, enabling adaptive responses to shocks (World Bank, 2015; World Bank, 2020).	Contributory schemes benefit from legal stability, while targeted assistance requires operational flexibility; both need transparent, rules-based frameworks and clear communication when changes occur.
Institutional roles and coordination	NSIA created as unified administrator under MoSS, but significant influence of Ministry of Finance on financing and investment persists; limited integration with other social programmes despite emerging data links via national ID (World Bank, 2020; Kassem, 2021).	Centrally led by MoSS through a dedicated TKP unit using Social Units and governorate directorates for delivery; strong involvement of international partners and ACA through the Unified National Registry; some inter-sectoral coordination with education and health for conditionality (World Bank, 2015; Kassem, 2021).	Both systems lack a comprehensive coordination mechanism across the social protection sector; a high-level council and deeper MIS integration could align contributory and non-contributory schemes and enable more coherent coverage strategies.
Human resources and capacity	Ageing civil service workforce, limited recruitment, weak performance incentives and uneven training constrain implementation of reforms, enforcement and client-oriented service delivery (Kassem, 2021).	Project-funded staff, intensive training and new digital tools improved capacity at the centre, but local Social Units initially struggled with workload and IT requirements; gradual improvements from training and recruitment of younger staff (World Bank, 2015; IFPRI, 2018).	Both systems require sustained investment in staffing, skills and performance management; capacity-building should accompany legal and technological reforms to avoid implementation gaps.
Accountability and oversight	Legal provisions for actuarial reviews and parliamentary reporting introduced; NSIA board includes representatives of workers and employers, but external audits and public reporting on fund performance remain	Strong external accountability through donor-financed results frameworks, independent impact evaluations and operational audits; functioning grievance redress system and pilots of community accountability committees enhance downward	Institutionalise independent evaluations and public annual reporting across both schemes; expand user-facing grievance and feedback mechanisms, adapting TKP-style tools to the contributory context where appropriate.

	limited (World Bank, 2020).	accountability (IFPRI, 2018; Kassem, 2021).	
Technology, MIS and data integration	Progressive digitisation of records and electronic payments reduces errors and fraud; integration with other administrative databases is under way but hampered by legacy systems and incomplete historical data (World Bank, 2020).	Comprehensive MIS from inception, tightly integrated with Unified National Registry and external databases; supports automated targeting, cross-checks, case management and real-time monitoring, enabling regular registry cleaning and performance tracking (World Bank, 2015; Breisinger et al., 2018a).	Investment in robust MIS and data integration yields substantial governance gains; next step is a shared social protection information architecture linking contributory and non-contributory data for coherent policy design and oversight (Jawad et al., 2019; Kassem, 2021).
Culture, trust and perceptions	Historical episodes of benefit erosion and perceived misuse of pension funds generate scepticism among contributors and weaken compliance incentives; rebuilding trust requires consistent delivery and greater transparency (Loewe and Westemeier, 2018; Kassem, 2021).	Initial scepticism among low-income households has declined as payments have been delivered reliably and coverage expanded; programme is increasingly seen as a credible component of the state's support to low-income citizens, though trust remains vulnerable to perceived unfairness or abrupt changes (IFPRI, 2018).	Communication strategies and visible improvements are essential to rebuild and sustain trust in both schemes; governance reforms must be accompanied by proactive engagement with contributors and beneficiaries.
Sustainability and error, fraud and corruption	Long-term financial sustainability depends on parametric reforms and expansion of the contributor base; main integrity risks relate to contribution evasion, under-reporting of wages and residual corruption in inspections and processing (World Bank, 2020; Kassem, 2021).	Fiscal sustainability hinges on budget prioritisation and maintaining sharp targeting; main integrity risks involve misrepresentation by applicants and potential local collusion, mitigated through MIS-based cross-checks, electronic payments and social accountability mechanisms (Breisinger et al., 2018a; IFPRI, 2018).	Ensure financial and political sustainability through evidence on impact and efficiency; apply lessons from TKP's data-driven verification and community oversight to strengthen social insurance enforcement, and from pension risk management to TKP's medium-term fiscal planning.

Conclusion

Egypt's social protection system has evolved substantially over the past decade through major reforms in both the contributory pension system and the non-contributory Takaful and Karama Program (TKP). Using the "Rules, Roles, and Controls" framework (Bassett et al., 2012), this paper examined how these reforms have strengthened institutional arrangements, clarified program rules, and expanded access to essential social protection mechanisms. The unification of pension laws under the 2019 Social Insurance Law represents an important step toward greater coherence and long-term sustainability. It

has streamlined previously fragmented schemes into a single legal and administrative framework, which enhances predictability for contributors and ensures that rules governing eligibility, contributions, and benefits are applied consistently across categories. In parallel, TKP has introduced modern eligibility systems, digital payments, and one of the region's most advanced MIS platforms. These developments reflect a strong national commitment to building a more inclusive and efficient social protection architecture. They also signal a broader shift toward data-driven decision-making, improved service delivery, and a more citizen-centric approach across social protection programs.

At the same time, the analysis highlights opportunities to further enhance alignment across institutions and ensure that reforms translate into consistent high-quality delivery across all governorates. As with any large-scale system undergoing rapid modernization, variations in implementation and operational pressures inevitably emerge. The increased number of beneficiaries and expanding program mandates place additional demands on frontline units, which must navigate complex administrative tasks, evolving guidelines, and continuous digital upgrades. Digital tools are being adopted at different speeds, reflecting variations in local infrastructure, staff skills, and resource availability. Coordination among institutions continues to evolve as new responsibilities and mandates are introduced, particularly as programs increasingly rely on integrated databases, interoperability, and shared verification procedures. These dynamics are typical of systems that are expanding in scope and sophistication, yet they also present an opportunity for Egypt to build on the strong foundations already in place by reinforcing coherence and strengthening operational readiness at all administrative levels.

Both the pension system and TKP offer complementary strengths that can be leveraged to reinforce one another. The digital innovations and data-driven targeting approaches used in TKP provide practical lessons for modernizing service delivery within the contributory system. TKP's experience with automated eligibility checks, digital grievance channels, and real-time monitoring demonstrates how technology can streamline processes and enhance transparency. In parallel, the pension system's long-term financing perspective and structured governance arrangements offer useful insights for ensuring TKP's continued sustainability as it scales. The pension system's emphasis on actuarial balance, investment governance, and long-term planning is highly relevant for non-contributory programs that must plan for periodic benefit adjustments and external shocks. Strengthening linkages between the two pillars would support a more integrated and adaptive social protection system that responds effectively to changing socio-economic conditions. It would also enable smoother transitions for individuals who move between different forms of employment and vulnerability, ensuring that they remain protected regardless of shifts in their circumstances.

Looking ahead, reinforcing high-level coordination around social protection policy could create significant gains. Establishing a permanent mechanism that brings together the key ministries and agencies would help ensure that reforms across contributory and non-contributory programs move in a harmonized manner. Such a body, building on existing inter-ministerial efforts, could guide the development of a unified social protection strategy that reflects Egypt's long-term social and economic objectives. It could support the integration of information systems and promote unified approaches to verification, enrolment, and benefit delivery. It would also help facilitate the sequencing of reforms so that beneficiaries experience coherent services across all points of access. Strong coordination has the potential to streamline program objectives, minimize overlap, and ensure that policies complement one another as coverage expands. Moreover, a central coordination platform could play a pivotal role in crisis response, ensuring that programs scale efficiently during periods of economic turbulence or external shocks and that communication with the public remains clear, timely, and consistent.

Enhancing accountability and transparency is another important area for continued investment. Regular actuarial reviews, periodic evaluations, and annual public reporting are international practices that strengthen confidence in social protection systems. Publishing consolidated information on program performance, financial sustainability, and coverage trends can support informed decision-making and foster constructive dialogue among policymakers, researchers, and stakeholders. Establishing clear performance indicators, supported by modern management tools, would help track progress, improve service quality, and guide targeted improvements. Strengthening grievance and feedback mechanisms, especially through expanded digital channels and increased user awareness, would support more responsive service delivery and allow institutions to address areas requiring refinement. User-friendly

grievance systems also help identify systemic issues early and offer valuable insights into beneficiary experiences. Community-based structures established under TKP could be adapted to other parts of the system, creating opportunities for participatory engagement and reinforcing trust between citizens and state institutions. Such engagement can help ensure that program design and operational adjustments remain grounded in local realities and beneficiary needs.

Administrative and technical capacity remain central to the effectiveness of social protection programs. Continued investment in staff training, modern tools, and digital transformation will help ensure that frontline units are equipped to implement reforms consistently and efficiently. This includes ongoing training in MIS use, case management, customer service, and data verification. As administrative demands increase with program expansion, flexible staffing arrangements and targeted recruitment of specialized profiles, including data analysts, IT specialists, and customer service professionals, can help maintain service quality. Strengthening data integration and interoperability between agencies will enhance the system's ability to respond to evolving needs, support policy coherence, and reduce administrative burden for citizens. Interoperable systems can also enhance the system's capacity to identify newly vulnerable households, track individuals' movement across programs, and ensure that support is tailored to dynamic needs. Investments in IT infrastructure, cybersecurity, and data protection are equally important for safeguarding sensitive information and ensuring that data-driven governance remains secure and trustworthy.

Expanding coverage and ensuring equity remain core elements of Egypt's social protection agenda. Continued efforts to encourage greater participation in social insurance, particularly among informal and self-employed workers, will help extend the benefits of long-term income security. International experience suggests that simplified enrolment pathways, accessible service points, and supportive incentives can increase participation meaningfully. Enhanced communication strategies can also play a role in increasing public awareness about the benefits of social insurance, especially for groups that may not have traditionally engaged with contributory systems. Maintaining the adequacy of TKP benefits and safeguarding the program's responsiveness to shocks will remain important priorities, particularly in the context of inflation and economic uncertainty. Benefit adequacy reviews, informed by data on living costs and poverty trends, can help ensure that TKP continues to provide meaningful support to vulnerable households. Ensuring that specific groups, including persons with moderate disabilities, older persons without sources of income, and young people transitioning into the labour market, have access to appropriate forms of protection will support Egypt's broader goals of social cohesion and inclusive development.

Overall, the evidence suggests that Egypt has established many of the core building blocks required for a strong and modern social protection system. A unified pension law, a flagship cash transfer program with advanced governance features, substantial digital infrastructure, and a growing culture of evaluation all represent significant progress. The next phase of reform lies in consolidating these achievements through stronger coordination, deeper integration, and continued investment in administrative capability. Further embedding digital tools, strengthening workforce capacity, and enhancing policy coherence will help ensure that reforms translate into sustainable improvements in service delivery. By doing so, Egypt can move closer to a comprehensive and adaptive social protection system that protects all citizens, whether formal workers, informal earners, older persons, or vulnerable households, from life's risks.

Advancing this agenda will reinforce social policy objectives and contribute to long-term resilience, social justice, and inclusive development. The experience described in this analysis demonstrates that governance is a central lever in translating strong policy design into measurable social outcomes. Egypt's ongoing reforms place it in a strong position to continue strengthening its social protection system, and the country's progress provides useful insights for others in the region undertaking similar transitions. Continued commitment to coordination, capacity enhancement, and data-driven policymaking will help ensure that Egypt's social protection system remains robust, responsive, and well-positioned to meet the evolving needs of its population.

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