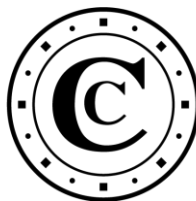


Cour des comptes



Chambres régionales  
& territoriales des comptes

# EVALUATION OF THE FRENCH ANTI- CORRUPTION POLICY

Thematic public report

Public policy evaluation

December 2025

## Summary

In response to requests expressed during the 2023 citizen participation campaign, the Cour des comptes decided to evaluate the French public policy for the fight against corruption over the past decade. The penal code defines corruption as "the act by a person of soliciting or accepting, without right, at any time, directly or indirectly, offers, promises, donations, presents or any advantages for themselves or for others (...) to perform or have performed, to refrain or have refrained from performing an act of their function, their mission or their mandate or facilitated by their function, their mission or their mandate". To determine the scope of its assessment, the Cour adopted a broader definition, integrating all probity offenses (extortion by a public official, illegal taking of interest, favoritism, embezzlement of public funds, influence peddling), which corresponds to the field of competence of the French Anti-Corruption Agency (Afa). The fields of cooperation and development aid, the issuance of visas and arms exports were excluded due to their specificity and their transnational dimension.

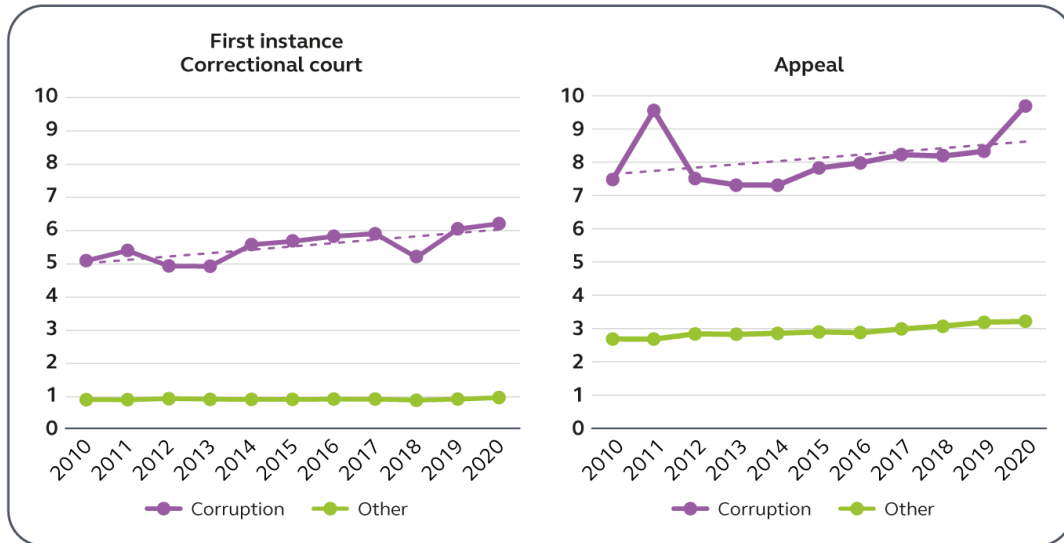
This assessment answers three questions: does the fight against corruption and against other probity offenses conducted since 2013 rely on a precise knowledge of corrupt phenomena and on an organisation adapted to the challenges? Do the actions to fight against corruption and against probity offenses allow for these infractions to be prevented and detected effectively? Are the administrative and criminal sanctions against corruption and other probity offenses effective? In light of the answers to these questions, the assessment finally analyses the overall coherence of the national anti-corruption strategy

### A lack of knowledge of corruption phenomena

The fight against corruption responds to democratic and economic imperatives but its target is complex because it aims at a phenomenon that is hidden by definition and often linked to other infractions. Public action in this field relies on a weak knowledge of the prevalence of corruption and its evolution: international indicators remain imprecise and the perception of the level of corruption by citizens primarily reflects a generalised mistrust toward their leaders. Victimization surveys show that corruption is not a marginal phenomenon (between 0.5% and 1% of the adult population in mainland France estimates that they have been a victim of corruption attempts) and that it concerns individuals as much as companies or public administrations. The facts recorded by the police and the gendarmerie, although increasing, remain few in number (934 in 2024), as do the convictions pronounced by the criminal justice system (350 in 2022). However, knowledge and monitoring of the phenomenon are indispensable to evaluate the effectiveness of prevention, detection and sanction actions.

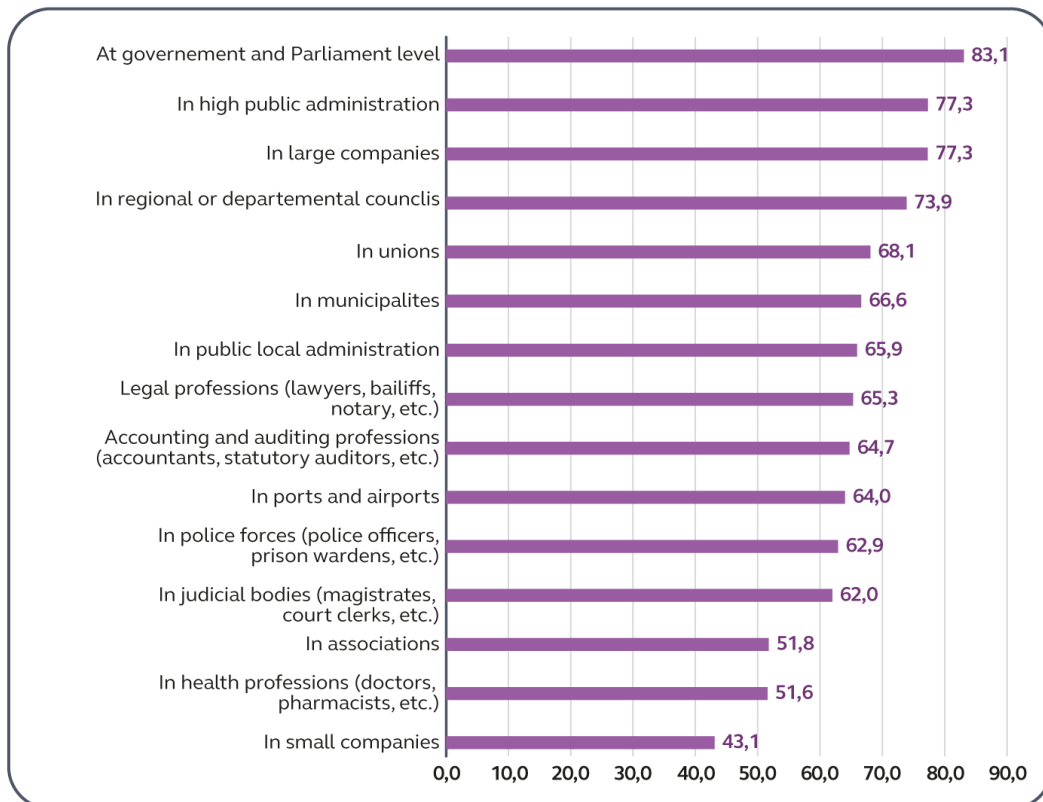
In this context, the Afa should reinforce measurement and analysis tools for corruption, by consolidating existing data, making indicators reliable and developing cooperation with research organisations.

### Trend in the number of probity offenses recorded between 2016 and 2024



Source: SSMSI-Afa, Probit offenses registered by security services in 2024, april 2025

### Areas where corruption is perceived as “very” or “fairly frequent” (%)



Source : Cour des comptes (Harris Interactive survey of November 2024)

In this context, the Afa should reinforce measurement and analysis tools for corruption, by consolidating existing data, making indicators reliable and developing cooperation with research organisations.

### **An extensive legal framework but built by accumulation**

Between 2013 and 2024, the legal framework for the fight against corruption underwent a significant evolution, marked by two major stages. In 2013, following the so-called "Cahuzac" affair<sup>1</sup>, the legislator imposed new rules of transparency and prevention of conflicts of interest on elected officials, public officials and, more broadly, on civil servants, in addition to those already existing for political parties. Starting from 2016, to protect the competitiveness of large French companies threatened by American extraterritorial sanctions, the Sapin 2 Act established a corruption prevention system, mandatory for companies and public entities. Since the beginning of the 2020s, several cases of so-called "low intensity" corruption, linked to organised crime and drug trafficking, led to the adoption of measures, including the law of June 13, 2025 aimed at getting France out of the narco-trafficking trap.

These evolutions are accompanied by the appearance of new stakeholders and instruments: the High Authority for Transparency in Public Life (HATVP), the National Financial Prosecutor's Office (PNF) and the Central Office for the Fight against Corruption and Financial and Tax Offenses (OCLCIFF), in 2013; the French Anti-Corruption Agency (Afa) and the public interest judicial convention (CJIP), in 2016; the national anti-organised crime prosecutor's office (Pnaco), in 2025.

These successive reforms have profoundly transformed the French framework for the fight against corruption. But this accumulation of measures, in reaction to national and international contexts, has produced a whole relying on numerous stakeholders, at the cost of a complex and sometimes poorly readable organisation.

Evaluating the cost of this policy is delicate. It relies primarily on systems already in place in public bodies and companies and only direct costs for the State – creation of specialised structures and assignment of specific staff within certain jurisdictions and services – can be identified. They represent a minimum amount of €22M and a staff of 170 positions, to which are added nearly 4,500 agents contributing partially to this policy.

### **A progressing rollout of prevention and detection instruments in the private sector, still incomplete in the public sector**

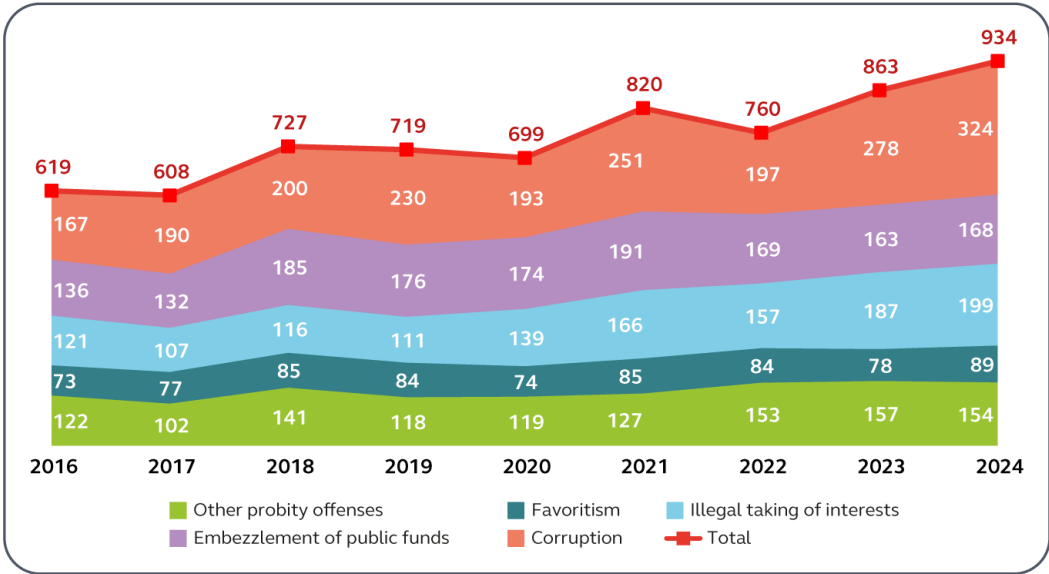
While French legislation has established an exacting framework for the prevention of corruption, its implementation lacks overall coherence. Beyond the Afa, several public stakeholders contribute to reinforcing the preventive environment without the fight against corruption constituting their primary mission. Regulated professions, at the interface between the private sphere and the administration, make few reports. Civil society, for its part, plays an important role, limited however by the still incomplete protection of whistleblowers and the difficulties encountered by certain associations in their accreditation procedure, while 6% of cases handled by the PNF since 2014 come from associative reports. The Cour recommends modifying the accreditation system for associations that can initiate public action, by specifying

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<sup>1</sup> Indictment in 2013 of the Minister Delegate for the Budget, Jérôme Cahuzac, for laundering money from tax fraud following the placement of undeclared funds in Switzerland and Singapore.

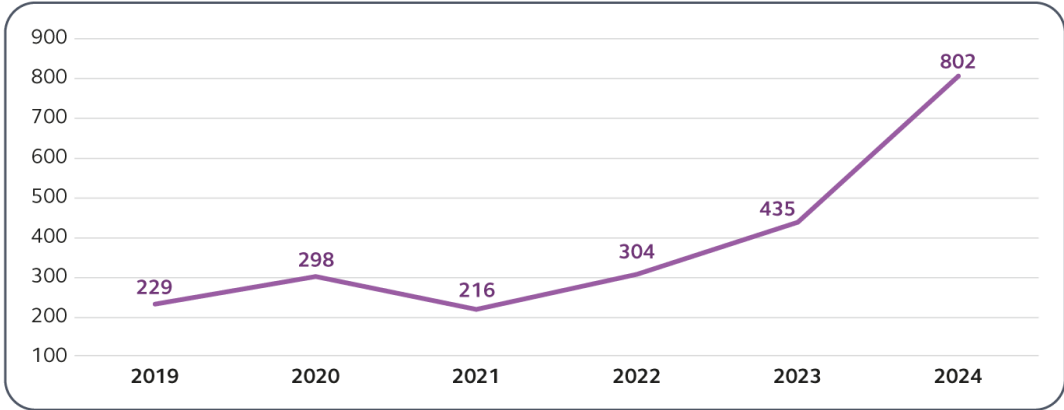
the criteria taken into account, by lengthening its duration of validity and by introducing a public opinion from the HATVP into the procedure.

**Number of reports received from Afa (2019-2024)**



Source : Afa activity report (2024)

**Suspected breaches of integrity reported to Tracfin (2013–2024)**



Source : Cour des comptes, based on Tracfin data (the blurred columns correspond to unit data below 5, whose graphical representation does not correspond to the actual value)

Prevention obligations are asymmetrical between the private and public sectors. Both must have an anti-corruption system, but its content is only precisely defined for private companies. In the public sector, only certain obligations – such as the designation of compliance officers and the establishment of internal alert systems – are formally provided for. Their rollout is, however, uneven.

Large companies subject to the obligations of the Sapin 2 Act represent 2% of French companies. They have made notable progress in the formalisation of prevention instruments and the objective of protecting French economic interests against extraterritorial prosecutions

has been achieved. However, the concrete effectiveness of the systems put in place depends on the commitment of the governing bodies, beyond compliance with formal requirements.

Conversely, in the public sector, the absence of a binding framework and clear steering has strongly limited the dissemination of prevention and detection measures. In practice, few administrations have analysed the corruption risks weighing on them or implemented adapted prevention measures, particularly in the local public sector. Numerous bodies do not respect their legal obligations, whether it concerns designating a compliance officer, setting up an internal alert system or publishing essential data for the public procurement contracts they award. The Afa should monitor the effective implementation of these mandatory measures.

The growth of risks linked to so-called "low intensity" corruption has recently sparked new initiatives around the Afa, such as the training actions developed by the prison administration or an application from the national gendarmerie aimed at tracing police file consultations. These promising approaches, which demonstrate an awareness, would benefit from being consolidated in a global approach to understanding human risks. The measures provided for by the law of June 13, 2025 (risk mapping, tools and control measures adapted to corruption challenges linked to organised crime) must be implemented, particularly regarding the detection of illicit file consultations and the management of personnel performing sensitive functions.

### **Insufficiently implemented non-criminal sanctions**

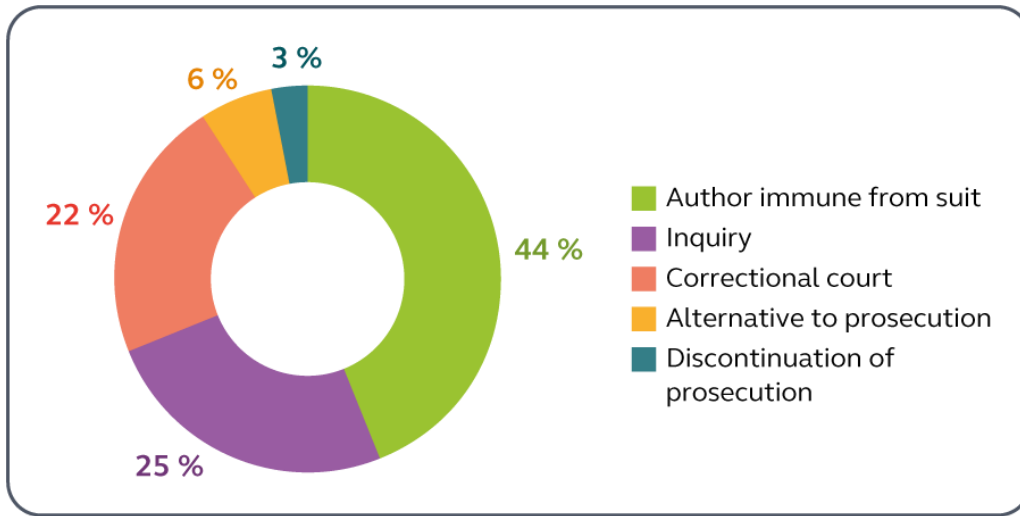
Probity offenses result in few sanctions in France, whether they are non-criminal measures or criminal sanctions. Regarding administrative measures, disciplinary proceedings in the civil service are poorly recorded, infrequent and unevenly applied. An interministerial doctrine, supported by consolidated data, appears necessary to harmonise their use and clarify their articulation with judicial procedures. Sanctions pronounced by the Afa are limited – its sanctions commission has not been referred to since 2021 – and the investigative powers of the CNCCFP are restricted. The HATVP does not have the power to sanction breaches by public officials and agents of their reporting obligations. It also does not have the possibility to publish the list of these. Furthermore, an evolution of the boundary between financial and criminal offenses could eventually be considered. In the immediate future, the priority is however to consolidate the jurisprudence resulting from the new liability regime for public managers that came into force in 2023. In general, the administrative repressive level, which should constitute a first lever for sanctions, remains largely underutilised.

### **A criminal justice chain under strain**

La chaîne pénale en matière d'atteintes à la probité repose sur une organisation duale. D'une part, des entités spécialisées à compétence nationale ou interrégionale (PNF, juridictions interrégionales spécialisées ou Jirs, OCLCIFF) traitent les dossiers les plus complexes. D'autre part, des entités de terrain peu spécialisées peinent à traiter les affaires de moindre intensité. Alors que les faits de corruption sont dissimulés et difficiles à établir, les moyens d'enquête mobilisés apparaissent insuffisants, tant sur le plan quantitatif que qualitatif.

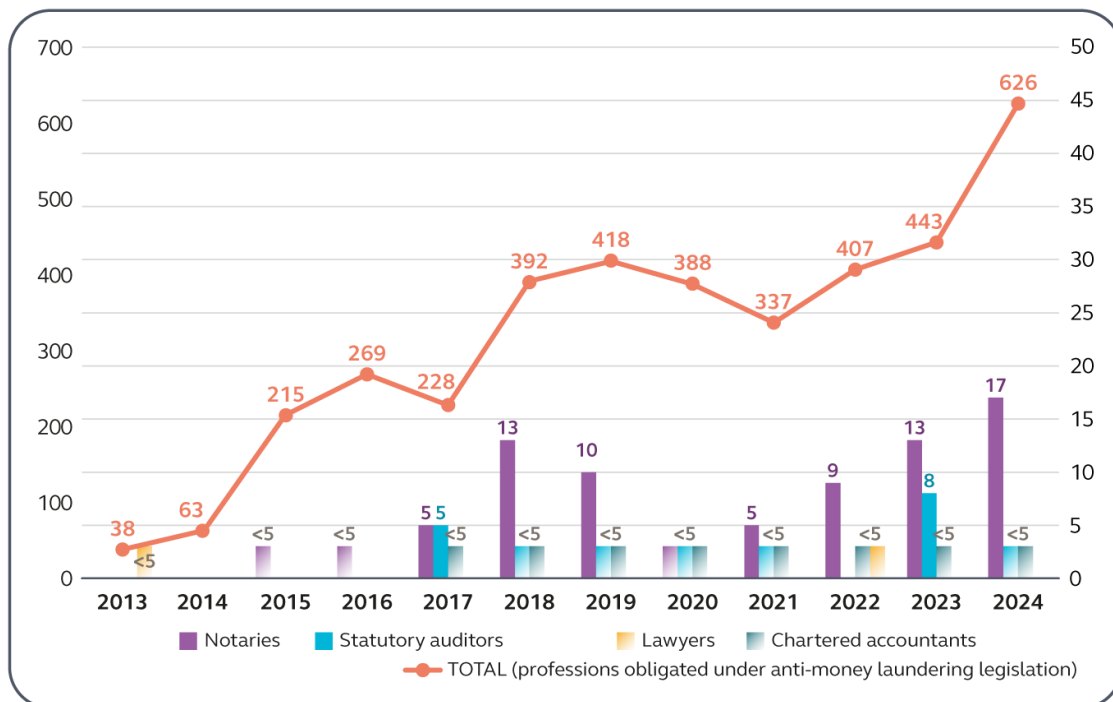
Cette capacité limitée retarde la caractérisation des infractions, entraîne la déperdition d'affaires et allonge leurs délais de traitement. La réponse pénale montre un écart important entre les affaires transmises aux parquets et les sanctions prononcées : 53 % des dossiers ne font pas l'objet de poursuites. Les délais sont élevés (6,1 ans en première instance, 8,3 ans en appel) et les sanctions privatives de liberté sont rares.

### Orientation of authors accused of breaches of probity, 2022



Source : Cour des comptes, based on DACG data

### Conviction delay in first instance and on appeal (in years)



Source : Cour des comptes, infract based on the national criminal record (SSER)  
 Note: time between the start of the first sanctioned offence and the date of final conviction

Probity offenses struggle to remain a priority in criminal policy, as they are competed with by mass delinquency (intrafamily violence, breaches of public order) and organised crime linked to drug trafficking. The ministry has not published a circular on criminal policy regarding this litigation for more than 10 years, whereas a harmonisation of practices – investigation strategies, prosecution orientation and requested penalties – would be desirable. While the

balance sheet of the public interest judicial convention (CJIP) system is overall positive, its articulation with the appearance on prior admission of guilt would benefit from being clarified when both mechanisms are mobilised in the same case.

Furthermore, a better structuring of the criminal justice chain is required. The increase in competence of investigators and magistrates must rely on reinforced training and on the valorisation of these functions within specialised professional career paths. Tighter operational steering is also desirable: prosecutor's offices should have a consolidated view of their portfolio, integrating the availability of investigators, in order to effectively direct procedures. In a context of constrained resources, shared skills could reinforce investigative services and jurisdictions, for example on technical aspects of civil service law or public procurement, which would contribute to reinforcing their processing capacities.

### **An anti-corruption strategy to be embraced**

Le cadre français de lutte contre la corruption a vu, depuis 2022, son efficacité limitée par l'absence d'une stratégie nationale clairement affirmée. Près de trois ans après l'échéance du plan national 2020-2022, le Gouvernement vient d'adopter, le 14 novembre 2025, un nouveau plan de lutte contre la corruption pour la période 2025-2029. Sa mise en œuvre doit être fondée sur une gouvernance claire et un portage politique fort, afin de mieux diffuser la culture de la probité et d'ancrer durablement l'action publique.

Dans ce cadre, le rôle de l'Afa comme cheffe de file de l'action publique anticorruption doit être consolidé. Pour la Cour, plusieurs scénarios d'évolution institutionnelle seraient envisageables. Un premier consisterait à fusionner l'Afa et la HATVP au sein d'une haute autorité anticorruption. Un second viserait à transformer l'Afa en autorité administrative indépendante. Le troisième scénario envisage la création d'un comité interministériel dont le secrétariat général serait confié à son directeur. Chacun de ces scénarios comporte des avantages et des limites. Le plan 2025-2029 prévoit l'installation d'un comité interministériel pour prévenir et lutter contre la corruption. Dans l'immédiat, la priorité est d'accroître la capacité de l'État à structurer et à animer la politique anticorruption, en confortant les acteurs existants et en leur donnant la visibilité et le soutien nécessaires.

## Recommendations

1. Ensure that the Afa reinforces the measurement and analysis system for corruption, by consolidating existing data, making indicators reliable and developing cooperation with research organisations (*Ministry of Justice, Ministry of Action and Public Accounts*).
2. Modify the accreditation procedures for anti-corruption associations by specifying the criteria to be taken into account, by lengthening its duration of validity and by introducing into the procedure an opinion from the HATVP made public (*Ministry of Justice*).
3. In the public sector, ensure that the Afa monitors the effective rollout of compliance officers, mandatory internal alert systems and the publication of data relating to public procurement (*Prime Minister*).
4. Implement control tools and measures adapted to the challenges of corruption linked to organised crime, particularly for the detection of illicit consultations and the misappropriated uses of files and for the management of personnel performing sensitive functions (*Ministry of Action and Public Accounts, Ministry of the Interior, Ministry of Justice*).
5. Disseminate an interministerial doctrine on the application of disciplinary sanctions in matters of probity offenses and their articulation with judicial procedures, relying on consolidated data (*Ministry of Economy and Finance*).
6. Develop criminal policy guidelines regarding probity offenses, specifying the choices of procedures, qualifications and penalties to be prioritised as well as the role of negotiated justice mechanisms (*Ministry of Justice*).
7. Reinforce the professionalisation of the criminal handling of probity offenses, relying on reinforced training, expertise reinforcements in the territories and adapted steering of means (*Ministry of the Interior, Ministry of Justice*).

More on the subject (in French): <https://www.ccomptes.fr/fr/publications/evaluation-de-la-politique-de-lutte-contre-la-corruption>