

Judicial control cause and causation in the United Arab Emirates

Buti Obaid Saeed AlFalahi

College of Identity and Nationality Sciences, Emirates Academy for Identity and Citizenship, Abu Dhabi, UAE; Buti.alfalahi@icp.gov.ae, Buttaya86@gmail.com

CITATION

Alfalahi BOS. (2024). Judicial control cause and causation in the United Arab Emirates. *Journal of Infrastructure, Policy and Development*. 8(12): 8453. <https://doi.org/10.24294/jipd.v8i12.8453>

ARTICLE INFO

Received: 7 August 2024
Accepted: 30 August 2024
Available online: 29 October 2024

COPYRIGHT

Copyright © 2024 by author(s).
Journal of Infrastructure, Policy and Development is published by EnPress Publisher, LLC. This work is licensed under the Creative Commons Attribution (CC BY) license.
<https://creativecommons.org/licenses/by/4.0/>

Abstract: Judicial control in administrative law has become a necessity in administrations. Given the significant role it plays in confronting illegal activities and preserving property, money and the security of individuals in society. This research aims to introduce judicial in the United Arab Emirates and discuss the relationship between cause and causation. The descriptive analytical approach was used to study the research problem. The research concludes that cause and causation are the most important elements that enable the judiciary to control the legality of the administration's decisions. It is of great importance to safeguard and protect individuals from abuse of administration by informing the person concerned of the reasons for making the decision, since the administration, in exercising its powers, must respect the set of legal rules established for it in the State. The research recommends that the competent authorities make causation an essential part of the cause and a failure to render administrative decisions null and void in order to ensure transparency and to affirm the rule of law, with the exception of acts of supreme sovereignty, in order to preserve the supreme interest of the State.

Keywords: judicial control; cause; causation; United Arab Emirates

1. Previous study

Ahmed Suleiman Al-Shari Al-Danhani discusses the importance of judicial control, with administrative monitoring authorities in the areas of administrative decision and administrative contracts through his research on judicial control of public authorities in the United Arab Emirates, it is clear to us that the administration has a broad power in its fields, especially administrative decisions, which are one of the most important privileges of administrative authorities, which is one of the most important advantages of the administrative authority to perform its duties towards citizens. (Ahmed, 2020).

Rahma and Nora studied the subject of the research, the scope of judicial oversight on the legitimacy of disciplinary decisions in the United Arab Emirates. The research problem represented in the following questions was:

What is meant by judicial control over judicial decisions?

What are the elements that the judge searches for his legitimacy in the judicial decision?

This research aims to study the expansion of judicial oversight practiced by the administrative judge on disciplinary decisions through the two parts.

The researcher followed the descriptive, analytical approach based on the formation and analysis of legal texts related to this issue, and many important results were reached, the most important of which is that the judicial control approved by the legislator on the public employee in the face of the disciplinary decision is an effective guarantee that can limit the insecurity related to administrative decisions, (Nora and Rahma, 2020).

But though From these laws, but they are not clear and lack clarity in this regard, as legislative texts are related to the subject of research through mystery and lack of clarity in their implementation in addition to the lack of expansion of the Emirati legislator in control over the appropriateness and proportion between the specific punishment and violations committed.

2. Introduction

Any modern state is based on judicial control, which means the rule of law, i.e. the state's actions and all its structures and individuals are subject to the law in force in it for judicial control. And enabling individuals to exercise control over the state during the performance of its functions, especially when it comes to judicial control activities, cause and justification, which is one of the most important methods of the state to achieve its goals of maintaining public order in an organized and preventive manner, considering that judicial oversight is a set of procedures and measures undertaken by public bodies to preserve public order with its three elements: public security; public health; and public tranquility.

Judicial control is an aspect of the existence of the state and its absence is sufficient to eliminate it, which requires that the privileges, powers and actions of the administrative police are not absolute and without limits and controls so that this does not lead to a disruption of the state system that is sufficient to eliminate it, but rather aims to establish and maintain public order, and between the requirements of protecting the rights and freedoms of individuals and citizens. Among the types of cause and justification that concern judicial control are the following:

Legal causes: Is a legal situation which is a reason for a management decision to accept or refuse to resign, and a staff member's application for retirement or reinstatement is the legal ground for an administrative decision by the administrative authority competent to terminate the employment association in the first case or the staff member's response to his request in the second case (Jadalhaq and Maknouzi, 2019).

Factual causes: A factual situation prior to and outside of an administrative decision justifying it, the material circumstances justifying the administrative decision, such as security disturbances reflecting the factual situation of decisions to maintain public security, an epidemic, floods, earthquakes, sedition or a war, each of which represents a factual causes justifying the issuance of administrative decisions that deal with them, such as preventing individuals from moving from or to this area or curfews, etc. (Watts, 2016).

To clarify, we mean individual decisions taken by individuals within an administrative framework without judicial oversight.

Therefore, the factual causes are defined as "the set of factual elements that occurred first and upon which the administration relied for the individual decision. (Al-Azzawi et al., 2023).

The highest Federal Court of the United Arab Emirates identified that the cause was as follows: "The administration must commit actually to the rule of law in its conduct by relying on an appropriate basis for terminating its employees' contract, (Ahmed, 2016).since the appellant had deviated from its decision to terminate the

appellant's service and had blocked the way to the law, as the papers had no legitimate cause or legal justification for the decision" (Alsaedi et al., 2023).

In another decision, the Supreme Federal Court of the United Arab Emirates defined the cause as "the factual causes that compels the administration to intervene for the purpose to produce the legal effect of the decision (Alzaabi et al., 2020). which is the subject of the decision, and that the cause is not a private or psychological element of the decision-maker, but an external objective element that would justify the action... and that the reason must be that the decision was made previously and existed even at the time of its adoption." Sakka et al. (2020).

The Supreme Federal Court of the United Arab Emirates has established that the causes for administrative decisions is independent and self-contained, and in this regard, it has held that "according to the established jurisprudence and administrative jurisprudence (Abdel, 2014).every administrative decision, whatever authority it makes, must be restricted or discretionary, based on a reason for its issuance, which is one of the elements of the administrative decision." (Kaff, 2021).

It needs to be noted that the Supreme Federal Court of the United Arab Emirates decided in its judgment that: "The administrative authority shall observe the rule of law in its conduct and must depend on an appropriate justification for terminating the services of its employees by describing the factual situation that justifies the administration's decision to terminate. (Al-Momni and Aljaber, 2019)The need for such attribution in cases permitted by law is a protection against fancy management in their judgments, often affecting the rights and freedoms of persons (Davis, 1966). "To examine whether the legitimate cause is available or not to the authority of the court of first instance, when the court's decision on the merits is based on such reasons as are described in the documents as are sufficient for carrying them" Ballantyne (1985).

Judicial control of the cause and causation refers to the legal or factual situation that prompts the administration to take an administrative decision, and is therefore considered the cause and justification for the administrative decision

In order of the above and through these brief introductions, we can see the importance of the subject of judicial control of the cause and justification, which aims to promote and protect the rights and freedoms of individuals equally among citizens without any discrimination, also ensuring the individual's right to the safety of his body, life, freedom, and the safety of his person.

The importance of this subject does not stop at its dedication to the principles of the Universal Declaration of Human Rights only, but also to the great role that this control plays in protecting society from all arbitrariness and transgression of the principle of legitimacy, and the exploitation of the administrative functions of the state, in the service of private interests, and exposing the interests of citizens to harm of various kinds, as the importance of the subject lies in protecting society from corruption and protecting the individual and ensuring his rights. As for the reasons for studying this topic, they lie in two main reasons:

- 1) The first reason is the subjective desire to research this topic in the field of judicial oversight, causation and justification, the desire and inclinations of researchers to study this topic.
- 2) The second reason is the objective aspect of this study, in the desire to fill the scientific gap related to the scarcity of research related to judicial oversight,

causation and justification for the United Arab Emirates. This is due to the fact that most researchers focus on studying the topic of judicial oversight, but without addressing the aspect of causation and justification, which is very important in administrative legislation and laws.

We have studied this topic in an attempt to answer the research problems, which are divided into a basic problem from which a set of sub-questions arise.

What is judicial control according to UAE legislator?

What is meant by causes and causation in judicial control?

The aim of the research is to identify judicial control in the United Arab Emirates and discuss the distinction between cause and causation relationship.

2.1. Method of research

The descriptive analytical approach was used to study the research problem.

3. Discussion and results

Based on the above, we discuss the distinction between cause and causation, since “causation” means disclosing the “causes” on which the decision is based, which means that there is a connection between them. However, despite that, they are two distinct ideas, as causation is one of the elements of the formal aspect of the decision, and the rules that determine it are related to The external legitimacy of the decision. As for the reasons, they are one of the objective elements of the decision, and the rules that govern them relate to the internal legitimacy of the decision. The reasoning is considered, in addition to being an “element” in the decision, it is considered an essential part of the principle of transparency, and therefore it is considered a “basis” for monitoring administrative decisions. Because through reasoning, it is possible to control the reasons for the decision and deviation from the procedures, but the role of the reason is different, that it is the basis of the decision on which it is based, and one of the elements of the subject of control over the decision, and not a basis for control, just as the judicial control over the reasons generates a kind of commitment to reasoning.

The causal relationship is represented by the reasoning in the administrative decision. We find that every administrative decision must have a reason that justifies its issuance, otherwise the decision becomes invalid in the event of its failure.

As for justification, it is the case in which the legislator obliges the administration to give reasons for its decision, that is, it obliges it to state the reason in the body of the decision. It follows that in the event of failure to give reason, the decision is considered voidable due to the absence of the form or procedures element and not the reason element, as the administrative decision may have a reason.

4. Control juridical the the physical existence of cause and causation

The judge’s first level of control over the element of the basis for the administrative decision is to ensure the physical presence of the factual causes that led to the decision being made. The material control of the facts constituting the rationale for the decision is the lowest degree of judicial control in this area, and it is subject to all administrative decisions. Whether the administration’s authority is limited by

particular grounds for the choice or whether the administration has discretion in selecting the reasons for its judgments, which is the origin. In all circumstances, such grounds are subject to the control of the abolishment judge regarding their availability in the material world or not.

The cause must exist and remain until the date of the administrative decision, specific and legitimate, and if the administrative decision issued is found to be based on false, incorrect or unlawful facts, or on general, vague or unknown facts, it must be characterized by a lack or invalidity of cause and is subject to revocation.

The validity of an administrative decision must be based on valid and established facts, otherwise unfounded and contrary to the law, for example, if the administration imposes a disciplinary penalty on an employee for a disciplinary offense, whereas the offense attributed to the employee does not exist, the decision to impose the disciplinary sanction is null and void on the basis of unfounded material facts .

The validity of the facts is also required by the above characteristics from the time of their occurrence and at the time of the decision, and is required whether the authority of the administration is restricted or discretionary, whether the administration is in good faith or in bad faith, and whether such decisions are made in normal or exceptional circumstances.

The administrative court shall monitor the validity of the existence of the facts on which the decision is based from the time it is made and must be truthful and correct , specific and not general, vague or ignorant, and must be real, not fake or authentic, and valid and derived from established origins.

In each administrative decision, it must be based on a valid reason for making it on the facts. Otherwise, it is deemed null and void, because it has lost an essential element, its *raison* and the justification for making it, whereas the cause of the administrative decision is not necessary, unless expressly required by law. In the uncaused administrative decision, it is presumed that it was based on valid reasons, and on those who claim otherwise to evaluate the evidence, and we find that if the legislator requires the cause of the decision, the procedure becomes an essential form of the administrative decision and its negligence results in nullity.

It should be noted that, for an administrative decision to be valid, it is not sufficient for the facts on which it is based to be present; rather, it is necessary that the facts be maintained until such time as they are issued. Such facts must be specific and precise, since they do not properly support the administrative decision through vague or unspecified facts, as required in those facts to be lawful.

The control over the physical presence of all administrative decisions at all includes, in contrast to the control over the legal adaptation of cause and the control of convenience, since control over physical presence is the first stage of judicial control of the cause of the administrative decision. The facts must be properly and consistently established for the validity of administrative decisions. Otherwise, they are unfounded and therefore contrary to the law. For example, if the administration imposes a disciplinary sanction on an official on the grounds that he or she has committed a violation of his or her duties, the administrative decision to impose disciplinary punishment on a public official is null and void, on the basis of material facts that are not legally established.

We note that administrative jurisprudence has established that the decision must be revoked, in the event that it is established that the administration based the justification for the decision on incorrect material facts, whether the administration was in good faith or mistakenly believed that the facts invoked had been established, or that the administration was aware of the absence of such facts, in both cases the decision is set aside on the ground that it was based on incorrect material facts.

In the case of a list of the reasons for the administrative decision, one of which was valid without the other, the Egyptian Council of State took the idea that the reason for the decision was not sufficient to impose the penalty for the dismissal. That reason was correct. It held that: "If the administration had an assessment of the disciplinary sanction within the limits of the quorum, that assessment was based on the fact that it had been based on all the criteria for the decision. If the foregoing shows that the dismissal sentence imposed on the applicant was assessed on the basis of the establishment of all the offenses against which it was charged and it was clear from the foregoing that not all the offenses were committed, the penalty in question and the situation in question was not entirely justified, and that the remainder of the irregularities in the applicant's case were not sufficient to carry the decision and therefore the judgement contested in the decision being rescinding the impugned decision had already been set aside".

It should be noted that the question arises as to whether an administrative judge may search for the correct reason and replace it with the incorrect one. Such a search would not interfere with the work of the administrative authority, given that the role of the administrative judge was to determine that the decision was invalid without going any further? Therefore, the Supreme Administrative Court affirmed that: "The administrative judiciary should not act as an administrator in replacing the reason for the decision with another reason, since the judge's role is limited to monitoring the validity of the reason for the decision by the administration. It is not permissible for him to go beyond this on the assumption that he is on other grounds for which the decision is based.

Judicial control over the reason for the administrative decision therefore revolves around the reason given by the Administration for issuing its decision to ascertain its validity, without any other role in changing the cause of the decision or replacing the original cause of the decision with another alternative. However, the administrative judge may substitute a legal ground for the decision contested by law, other than the reason on which the administrative authority made its decision in the event that the administrative authority made the legal ground during the proceedings. This is supported by common sense, since if the decision is not valid, the administrative authority will again issue a decision on the same substance but on the legal ground. Consequently, there is no point in ruling that the decision is invalid. Rather, it is more appropriate to substitute the legal ground for the unlawful cause of the contested decision. In the absence of a payment by the administrative authority issuing the decision, the administrative judge may not substitute the legal ground for the unlawful reason for the decision on its own motion, but may rule that the decision is not valid on the basis of the reason presented to it in the contested decision because it is an interference with the actions of the administration-leaving the claimant's right to take advantage of the impugned decision.

The Supreme Federal Court of the United Arab Emirates further ruled that: It is established that the control of the administrative judiciary over the validity of a factual situation which is the natural cause of the matter is limited in ascertaining whether the outcome of the decision in this regard is a permissible extract from existing or non-existent assets, or whether the process of adapting the facts to the materiality of their existence does not produce the result required by law. The decision is not based on one of the elements of the law, and the administrative decision is considered to have been contrary to the law.

It should be noted that, in issuing an administrative decision, the administrative authority may invoke many of the reasons that have not been specified by law. The argument that some of these grounds are invalid does not lead to the annulment of the administrative decision, since if these reasons, which have been proven to be valid, are sufficient to justify the adoption of the administrative decision. The Supreme Federal Court of the United Arab Emirates has established in this regard that: If the contested administrative decision has been attributed to three reasons, two substantial reasons are sufficient to remove the construction, and this decision does not render the decision invalid, and therefore, because the third ground has not been established.

It is clear from the previous judgement that the Supreme Federal Court of the United Arab Emirates has adopted the criterion of the adequacy of the grounds for administrative decision-making, regardless of the distinction between the main and secondary grounds, where the administrative decision is flawed and therefore subject to annulment, if its reasons are found to be incorrect, and has played a key role in making the decision. If these reasons are found to be legal and of great importance, while the other grounds are sufficient to induce the decision to be taken by a person who is the source of the decision, the judiciary goes beyond those flawed legal grounds and refrains from ruling the decision to be set aside for the fault of cause.

It should be noted that the Supreme Federal Court of the United Arab Emirates did not apply the subjective criteria, which distinguishes between the main facts and the minor facts by the force of their respective influence on the administration's decision-making process. This is extremely difficult, as some jurisprudence considers that the error in any of the facts on which the decision was based would cast doubt on the management's assessment of all the material facts invoked. Consequently, the decision must be revoked. In fact, this would result in the judiciary respecting the administration's freedom to assess it when the decision is appropriate and proportionate to the facts, but it is required to base it on valid grounds.

In the view of some, the administrative judge must exercise control over the correct reason for the administration's decision. This is therefore not a substitute for the reason, since the administrative judge has not given him a new reason or discovered that the decision was based on the case papers. The administration has failed to pay attention to him, but rather the administrative judiciary imposes its control over a reason that has been brought to his attention and taken into account by the administration.

In this regard, the Supreme Federal Court of the United Arab Emirates ruled that: "In the case of this court, the administration is to have the power to make decisions that are appropriate to the issuance of decisions and when they are based on valid facts and are derived from the established documents of the proceedings, which is the reason

for the decision, which consists of a set of factual and legal elements that allow the administration to act in a manner that allows the decision to be taken.”

The case law of the Supreme Federal Court of the United Arab Emirates establishes its control over the materiality of the facts caused by the Administration ‘ s decision to impose disciplinary sanctions. The Court states that “the decision to impose a sanction as any other administrative decision must be based on a justified reason. The Administration shall not interfere with the imposition of the sanction unless a factual or legal situation justifies its intervention and the Federal Supreme Court may monitor the validity of these facts.”

It should be noted that if the administrative authority makes several reasons for making a decision when the law does not specify compelling reasons for the decision, the fact that some of these grounds are not valid does not lead to the annulment of the administrative decision if it is found that the reasons for the decision being valid are sufficient to justify the decision being taken or its bearing. The Supreme Federal Court of the United Arab Emirates has established that “if the contested decisions are based on three grounds, two of these substantial reasons are sufficient to eliminate the construction, these decisions do not render them invalid and are necessary for the failure to establish the third reason”.

It is clear to us that the Supreme Federal Court of the State of Emirates has adopted the criterion of the adequacy of the reasons for the decision and of the failure to consider the distinction between the main and the additional or secondary grounds under the objective criterion, so that the decision is flawed by the fault of the cause and is subject to revocation if the incorrect reasons are found to have played a key role in the administrative decision, but if they are found to be of little importance and the other valid reasons are sufficient in themselves to carry the decision, the judiciary goes beyond the faulty reasons and refrains from ruling to set aside the fault of the absence of the cause.

Based on the previous, the judge’s control over the physical existence of the facts is concerned with the following:

Ensure that the facts taken as a basis for the decision are physically present and in fact present until the decision is made. The facts constituting the resolution are specific, vague and unambiguous.

The decision is based on facts that are not communicated or public, and vice versa is an anonymous decision. The facts on which the decision is based must be serious, unsolved, unshakeable and unsettling, and unmistakable. On these pillars, the judge shall verify the physical existence of the reason for the administrative decision and, if he completes the verification of the physical existence and the physical validity of its existence, shall apply to the proper legal qualification which the administration has given to those facts, in order to verify whether or not this legal qualification is applicable.

5. Conclusion

After studying judicial control and discussing the relationship between cause and causation in the United Arab Emirates, The most important findings we have reached are:

- 1) Cause and causation the most important element that enables the judiciary control the legality of the administration's decisions. It is of great importance safeguards to protect individuals from abuse of administration by informing the person concerned of the reasons for making the decision, since the administration, in exercising its powers, must respect the set of legal rules established for it in the State.
- 2) The importance of judicial control arises when a judge is subjected to administrative control in connection with an action for compensation or annulment, as the presentation of reasons helps him to achieve his control easily and easily.
- 3) The cause and causation make the administration restrictive in making his decisions either under restricted jurisdiction or under discretionary authority on the basis of factual and legal grounds justifying their issuance and indicating such reasons would facilitate the control of the legality of the grounds and thus the decision and make it more effective.
- 4) The cause and causation play an important role in enabling the judiciary to exercise control over the facts on which the decision is based and to adapt it to the law, in addition to the fact that it often leads to the conviction of those who are entitled to the decision as a matter of legitimacy, thus reducing the judicial burden of many disputes.

Therefore, we strongly recommend:

- 1) the competent authorities to make causation an essential part of the cause and a failure to render administrative decisions null and void in order to ensure transparency and to affirm the rule of law, with the exception of acts of supreme sovereignty, in order to preserve the supreme interest of the State.
- 2) The content of the principle of transparency, since it is of paramount importance to activate the juridical control role and to verify the validity of the administrative decision-making elements on the one hand and as an invitation to the Department to study the validity of its decisions and thus to avoid them becoming involved in the errors of the illegality of its legal acts, as well as the fact that the cause improves the relationship between the administration, the concerned and the public.
- 3) Juridical control is an effective means of protecting rights and freedoms, insofar as the administration causes its decisions to the extent that the administration's authority is restricted, is the best administrative method of protecting individuals and their freedoms because it determines the department's constituency within which to act.
- 4) Attribution is an effective means of protecting rights and freedoms, insofar as the administration causes its decisions to the extent that the administration's authority is restricted, and restrictive authority is the best administrative method of protecting individuals and their freedoms because it determines the department's constituency within which to act.

Conflict of interest: The authors declare no conflict of interest.

References

- Al-Shibi, A. A. (2006). *Administrative Decision in France and the United Arab Emirates*. Arab Thought House.
- Ismail, I. A.-B. (2015). *Administrative Judiciary, Comparative Study*. House of Author.
- Ashraf, A. F. A. M. (2007). *Reasons for administrative decisions before the annulment judge, comparative study*. Knowledge Establishment.
- Iman, H. R. (2010). *Causing administrative decisions, comparative and applied study in the French, Egyptian and United Arab Emirates legal system*. Al-Fallah Library.
- Hassani, D. A. (1981). *End of Non-Judicial Administrative Decision*. Communication.
- Osman, H., Osman, M. (2004). *Organic Law*. University Press.
- Alzuobi, K. S. (1999). *Administrative Decision between Theory and Practice*. Cultural House Publishing.
- Thorburn, M. (2012). *Proportionate Sentencing and the Rule of Law*. In: Zedner, L., Roberts, J. V. (editors). *Principles and Values in Criminal Law and Criminal Justice: Essays in Honour of Andrew Ashworth*. OXFORD academic. pp. 269–284.
- Fawdeh. (2010). *Elements of the existence of the administrative decision, comparative study*. Arab Renaissance House.
- Davis, K. C. (1966). *Judicial control of administrative action: A review*. *Colum Law Review*, 66, 635.
- Al-Tukhi, S. (2013). *Judicial Supervision of the Cause of Administrative Decisions*. Iiinois Institute of Teachnology.
- Al-Masdoum, S. S. (2012). *Swedish Public Official Disciplinary Procedures and Guarantees in accordance with the Federal Government Human Resources Act No. 11 of 2008, Comparative Study*. Law Book House.
- Al-Owais, H. R. (1989). *The role of the Supreme Court in the constitutional system of the United Arab Emirates-a comparative study [PhD thesis]*. Durham University.
- Samhadana, A. N. A. (2014). *Administrative Adversarial Proceedings*. National Centre for Legal Issuances Publishing.
- Alzaabi, A. A. J., Marni, N. B., Shehab, A. A. (2020). *Judicial control over public administration in the United Arab Emirates*. *Journal of Southwest Jiaotong University*, 55(3).
- Ahmed, S. G. (2016). *The constitutional structures of the federalism in the Middle East*. *Journal of Humanity Sciences*, 20(3), 370–394.
- Mohsen, K. (1999). *Principle of legality and organization of administrative justice*. Tony Press Publishing.
- Kingsbury, B. (2009). *The concept of ‘law’ in global administrative law*. *European. Journal of International Law*, 20(1), 23–57.
- Amini, M., Enayattabar, R. (2018). *Comparative Study of Civil Liability: Indirect Cause and the Direct Cause in Iran Law and Intervening Factor in England Law*. *Comparative Law Review*, 9(1), 1–23.
- Ali, Y. S. (2024). *The Extent to Which the Fault Is Required as a Basic Element of the Tortious Liability in the Iraqi Civil Law: An Analytical Comparative Study*. *International Journal of Law and Society*, 12(2), 39–50.
- Jadalhaq, I. M., Maknouzi, M. E. H. E. (2019). *Reading UAE Contract Law through the Lens of Islamic Jurisprudence: A Case Study on the ‘Extraneous Cause Exception in the UAE Civil Code*. *Global Jurist*, 19(2), 20180045.
- Al-Azzawi, H. A., Isa, Y. M., Salleh, A. S. M. (2023). *The Causation as a Guarantee for the Protection of the Acquired Employment Rights in Case of the Administrative Revocation:(A Comparative Study)*. *RES MILITARIS*, 13(1), 1965–1977.
- Watts, R. L. (2016). *Comparing federal political systems*. In: *Understanding federalism and federation*. Routledge Publishing. pp. 11–30.
- Al-Momni, S., Aljaber, M. (2019). *Court of cassation’s control over interpretation of rules of the foreign law by the national judge according to the jordanian legislation Asma’a Al Raqqad*. *Global Journal of Politics and Law Research*, 7(5), 1–18.
- Al-Billeh, T. (2022). *Legal Controls of the Crime of Publishing a Program on the Internet in Jordanian Legislation*. *Pakistan Journal of Criminology*, 14(1).
- Ballantyne, W. M. (1985). *The Constitutions of the Gulf States I a Comparative Study*. *Arab Law Quarterly*, 1(2), 158–176.
- Kaff, A. F., Muhaimin, M., Haq, L. M. H. (2021). *Comparative Study of the Legal Position of Notary in Indonesia and the United Arab Emirates*. *International Journal of Multicultural and Multireligious Understanding*, 8(1), 348–359.
- Sakka, F., Maknouzi, E. H. E., Jadalhaq, M., Mohammad, I. (2020). *Supporting organisational justice through a legal framework for performance appraisal in the United Arab Emirates: Management case and comparison with the French system*. ADAPT University Press.
- Alsaedi, A. S., Abdullah, M. N. B., Abhalim, M. A. (2023). *Complications of Adjudicating Administrative Disputes Under the Unified Judicial System in the United Arab Emirates*. *IJASOS-International E-journal of Advances in Social Sciences*, 9(27), 450–469.

- Ahmed, S., Al-Sharari, A. N. D. (2020). Judicial oversight of public authorities in the United Arab Emirates. *Journal of Law for Legal and Economic Research*, 2(1), 211–264.
- Al-Darmaki, R., Rashid, N. H. (2020). The scope of judicial control over the legitimacy of disciplinary decisions in the United Arab Emirates [Master's thesis]. United Arab Emirates University.