

Overview of the institutional and normative-legal framework for anti-corruption policy in Ukraine

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Abstract

The article examines the transformation of Ukraine's anti-corruption policy following the 2014 Revolution of Dignity in the context of European integration. It outlines the main stages in the development of the modern anti-corruption infrastructure, including the establishment of specialized institutions — NABU, NACP, SAPO, HACC, ARMA, and the SBI. The legal framework is analyzed, including the laws «On Prevention of Corruption», «On the National Anti-Corruption Bureau of Ukraine», «On the High Anti-Corruption Court», as well as amendments regarding the protection of whistleblowers. The article highlights the role of the Anti-Corruption Strategy for 2021–2025 and the State Anti-Corruption Program as instruments for implementing systematic state policy. Emphasis is placed on mechanisms for preventing corruption: electronic asset declarations, transparent public procurement via the ProZorro system, conflict of interest regulation, digitalization of public services, and public awareness campaigns. It is noted that despite the establishment of institutional and legislative foundations, the main challenge remains effective law enforcement, particularly regarding the independence of anti-corruption bodies and the judiciary. The article analyzes the influence of international organizations (EU, IMF, OECD) on shaping Ukraine's anti-corruption policy and evaluates the implementation of international conventions. It also explores the prospects for further development of the system, considering the challenges of wartime and the requirements of EU integration. Based on the findings, the article provides recommendations for strengthening inter-agency coordination, improving digital oversight tools, and fostering a culture of integrity in society.

Keywords: anti-corruption policy; NABU; NACP; public administration; European integration.

1. Introduction

Corruption remains one of the most serious challenges to social development and public governance. It undermines the rule of law, hinders economic progress, and erodes citizens' trust in institutions. Following the 2014 Revolution of Dignity, Ukraine embarked on decisive anti-corruption reforms aimed at overcoming deeply rooted corruption and aligning with European standards of good governance [27]. Over the past decade, a series of initiatives have been implemented, resulting in the establishment of an entire anti-corruption infrastructure, including specialized agencies and new laws designed to prevent corruption, ensure accountability, and foster a culture of intolerance towards corrupt practices.

2. Literature Review

The issue of preventing and combating corruption is one of the central topics in Ukraine's legal academic discourse, driven by both internal challenges and the country's external commitments in the framework of European integration. Among Ukrainian scholars, M.I. Melnyk has made a significant contribution to the development of anti-corruption policy theory. His monographs thoroughly explore the social nature, concept, trends, consequences, and countermeasures against corruption, framing it as a systemic threat to democratic governance and institutional trust [30]. At the same time, O.Yu. Busol analyzes

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corruption-related crime as one of the most serious threats to Ukraine's national security, emphasizing its transformation in contemporary society [31].

From the standpoint of administrative law, the work of V.I. Lytvynenko is noteworthy, as it examines the administrative and legal foundations of anti-corruption policy, the regulatory framework, and functional constraints of state influence [32]. An institutional approach is presented in the research of V.O. Mandybura, who stresses the importance of inter-agency coordination and the development of effective oversight mechanisms [33]. M.V. Romanov offers a comprehensive reflection on the key provisions of anti-corruption legislation, particularly concerning the activities of specialized agencies and the strategic directions of state policy in this area [34]. In her dissertation research, A.O. Kladchenko provides a scholarly substantiation of the formation and development of modern anti-corruption legislation, grounded in the evolution of legal approaches and adaptation to international standards [35].

A deeper theoretical analysis of corruption must consider the broader context of state legal policy. V.M. Tarnavska defines legal policy as a system of strategic ideas aimed at ensuring the legal development of society and the state with the participation of civil society institutions [36]. A. Selivanov and O. Riabchenko identify the protection of rights and freedoms, economic development, the functioning of justice, and foreign economic activity as key priorities of legal policy [37]. Meanwhile, N.A. Zhelezniak emphasizes that legal policy should serve the function of normative support for reforms, especially in the context of active European integration [38].

Thus, contemporary Ukrainian scholarship offers a comprehensive vision of anti-corruption policy as a component of broader state legal policy, which should be strategically oriented, institutionally effective, and normatively aligned with European standards.

3. Main results

As of 2025, Ukraine possesses a comprehensive anti-corruption institutional framework, which encompasses the National Anti-Corruption Bureau of Ukraine (NABU), the National Agency on Corruption Prevention (NACP), the Specialized Anti-Corruption Prosecutor's Office (SAPO), the High Anti-Corruption Court (HACC), as well as additional bodies such as the State Bureau of Investigation (SBI). The functioning of these institutions has been supported by the adoption of a range of legislative acts, including the Laws of Ukraine «On Prevention of Corruption», «On the National Anti-Corruption Bureau of Ukraine», and «On the High Anti-Corruption Court». Furthermore, critical mechanisms have been introduced, such as electronic asset declaration, transparent public procurement through the ProZorro system, and legal protection for whistleblowers.

In parallel, the European Union has developed its own institutional and regulatory architecture to counter corruption. Instruments such as the European Anti-Fraud Office (OLAF) and the European Public Prosecutor's Office (EPPO) serve as prominent examples. The governance practices of certain EU member states—most notably Denmark and Sweden—are widely regarded as exemplary models in the formation of an effective anti-corruption environment at the international level.

Since 2014, Ukraine has undertaken an intensive effort to construct an anti-corruption infrastructure aligned with international standards. Between 2014 and 2020, a network of specialized institutions was established to perform functions related to the prevention, detection, investigation, and adjudication of corruption-related offenses. The most prominent outcomes of this institutional reform include the establishment of NABU, NACP, SAPO, HACC, and the SBI.

NABU operates as an independent law enforcement agency with jurisdiction over corruption crimes committed by high-ranking public officials [5]. The respective law was adopted in October 2014, and the first director of the Bureau was appointed in April 2015 following an open and competitive selection procedure [5, 22]. NABU has been vested with authority to conduct pre-trial investigations into high-level corruption offenses and has rapidly emerged as a central actor within Ukraine's new anti-corruption framework. Expert assessments indicate that NABU is among the most functionally effective anti-corruption institutions in Ukraine. Nonetheless, sociological data reveal a persistent lack of public awareness regarding the activities of NABU and other newly formed bodies [5]. This observation underscores the need to strengthen the transparency and public communication strategies of these institutions, in order to ensure greater legitimacy and societal engagement in anti-corruption efforts.

The National Agency on Corruption Prevention (NACP) is a central executive authority tasked with the development and implementation of state anti-corruption policy. Its core responsibilities include the verification of electronic asset declarations, monitoring of conflicts of interest, and implementation of other preventive measures [15]. The NACP was established pursuant to the Law of Ukraine «On Prevention of Corruption» in October 2014, although the agency effectively began functioning in 2015–2016 following the formation of its governing board [5]. Initially, the NACP operated as a collegial body composed of five equal-ranking members; however, this format proved ineffective and was subject to criticism due to perceived political dependency and institutional inertia.

In 2019, the NACP underwent a comprehensive «reboot» through legislative amendments that introduced a single-person leadership model. A new head was selected via an open competitive procedure, and the agency's personnel were renewed accordingly [5]. These reforms facilitated the agency's transition to a qualitatively new operational framework. At present, the NACP manages the Unified Register of Electronic Declarations, verifies officials' asset disclosures, and is authorized to impose administrative liability for corruption-related offenses (e.g., failure to submit declarations or submission of false information) [15]. Additionally, the NACP drafts the national Anti-Corruption Strategy and corresponding implementation programs and coordinates anti-corruption policy across various sectors of the economy.

The Specialized Anti-Corruption Prosecutor's Office (SAPO) is an independent structural unit within the prosecution system, responsible for overseeing NABU-led investigations and representing the state in high-level corruption cases before the court. SAPO was created as a result of amendments to the Law on the Prosecutor's Office in 2015 [20] and became operational in September 2015 upon the establishment of the Special Prosecutor's Office [5]. Initially, SAPO was formally subordinated to the structure of the Prosecutor General's Office (PGO), which raised concerns regarding potential undue influence from PGO leadership. In 2016, at the insistence of the International Monetary Fund (IMF), legislation was adopted to strengthen SAPO's autonomy, including competitive selection of its head and increased operational transparency [5].

During 2018–2019, tensions emerged between NABU and SAPO's first head due to allegations of information leaks concerning ongoing investigations. These developments led to the resignation of SAPO's head in 2020. A new head was appointed only in July 2022, under significant pressure from European partners [5]. Full institutional independence was achieved in 2023 through legislative amendments that formally recognized SAPO as a separate legal entity, fully detached from the Office of the Prosecutor General [26]. SAPO plays a critical role in ensuring the prosecutorial follow-through of high-level corruption cases and securing convictions of top officials.

The High Anti-Corruption Court (HACC) is a specialized judicial body established for the adjudication of criminal proceedings concerning high-level corruption offenses investigated by the National Anti-Corruption Bureau of Ukraine (NABU) and prosecuted by the Specialized Anti-Corruption Prosecutor's Office (SAPO) [8]. The establishment of HACC necessitated amendments to the legislation on the judiciary; the respective law was adopted in June 2018, and the court commenced its operations in September 2019. The launch of HACC was preceded by considerable political resistance, and the government delayed its operationalization for almost a year after the law had been passed [5]. However, under significant pressure from civil society and international partners, the judicial selection process was ultimately completed. HACC serves as the final institutional component in the anti-corruption chain, ensuring that investigations conducted by NABU and supported by SAPO are adjudicated by a court with specialized jurisdiction, thereby minimizing the risks of political pressure on judges and procedural delays typical of the general court system.

According to policy analysts, the effectiveness of the anti-corruption architecture is contingent upon the coordinated functioning of all its constituent elements—NABU, SAPO, and HACC [5]. Consequently, political actors often attempt to undermine or obstruct at least one of these key institutions. Examples include the prolonged delay in appointing the head of SAPO and the resistance to establishing HACC [23].

The State Bureau of Investigation (SBI) is a law enforcement body established at the end of 2015 and operationally launched in 2018. Its mandate includes the investigation of crimes committed by high-ranking officials, judges, law enforcement officers, as well as military crimes and other offenses [9]. Although the SBI is not a narrowly focused anti-corruption institution, its jurisdiction extends to corruption-related offenses that do not fall within NABU's purview. The conceptual foundation for the creation of the SBI dates back to 2012, but the Bureau was institutionalized only after 2014, as part of a broader reform of the law enforcement system [5].

In 2019, the SBI underwent structural reform, including leadership changes, due to allegations of political influence under the previous administration [5]. Currently, the Bureau is responsible for investigating, among other matters, corruption offenses committed by judges and officials outside NABU's jurisdiction, as well as cases of collaboration and crimes linked to Russian aggression—a particularly salient task since 2022. Nevertheless, the SBI's level of institutional independence remains contested. There have been repeated accusations of selective investigations and politically motivated pressure on businesses [5]. Within the context of the anti-corruption system, the SBI complements the work of NABU by covering additional categories of public officials. However, to ensure functional equivalence with specialized anti-corruption bodies, the SBI must be provided with comparable levels of independence and operational effectiveness.

In analyzing Ukraine's anti-corruption framework, special attention must also be given to the Asset Recovery and Management Agency (ARMA). ARMA is a specialized body established in late 2015 with the mandate to trace assets derived from corruption and other criminal activities and to manage seized assets pending their confiscation by court order [16]. In February 2016, ARMA was granted broad authority not only to identify but also to manage seized property, including the right to sell or transfer such assets to external managers in order to preserve their value. The launch of the Register of Seized Assets was part of the legislative package adopted by Ukraine as a condition for securing visa liberalization with the European Union.

However, in the following years, ARMA's operations faced mounting challenges. Allegations emerged that, rather than promoting transparency, the agency was being used as an instrument to exert pressure on businesses [5]. In response to growing criticism, the government initiated a «reboot» of ARMA in 2021 by appointing new leadership in an effort to restore public trust. Nevertheless, the new director, appointed in 2023, was also met with skepticism from the expert community, indicating that further reforms may be necessary to enhance the agency's effectiveness [5].

Thus, between 2014 and 2019, Ukraine systematically developed a network of new institutions aimed at combating corruption at the highest levels of government. Analytical studies emphasize that this process was driven by persistent pressure from civil society and was significantly supported by international partners, primarily the International Monetary Fund and the European Union [2, 5]. Many reforms were explicitly tied to conditionalities attached to financial assistance or other forms of external incentive.

Nonetheless, the establishment of institutions represents only the initial stage in the broader struggle against corruption. A major ongoing challenge lies in safeguarding the independence and long-term functionality of these bodies. Ukrainian political authorities have repeatedly attempted to weaken newly established institutions, either by introducing legislative amendments or by exerting political influence over the appointment of their leadership.

The development of Ukraine's anti-corruption institutions was accompanied by the adoption of a comprehensive set of laws and regulatory acts that laid the legal foundation for the national anti-corruption framework. Notably, the Law of Ukraine «On Prevention of Corruption» (2014) [21] sets out the core principles of state anti-corruption policy, establishes the National Agency on Corruption Prevention (NACP), introduces requirements for financial control (including asset and income declarations by public officials), and regulates issues such as conflict of interest, restrictions on gifts, and codes of ethical conduct. The adoption of this law enabled, for the first time, the mandatory electronic declaration of assets by public officials and their family members [7]. In 2015–2016, subordinate regulations were enacted to determine the format and scope of the information subject to declaration [5]. The law also provides mechanisms for verifying asset declarations (via the NACP) and stipulates liability for the submission of false or inaccurate information. It thus constitutes a cornerstone of the newly established preventive anti-corruption framework.

In order to operationalize the Law «On Prevention of Corruption», the Law of Ukraine «On the National Anti-Corruption Bureau of Ukraine» was adopted in 2014 [22]. This legislation defines the legal status, powers, and organizational structure of NABU as an independent state law enforcement body. It introduced a competitive selection procedure for the Bureau's director, institutional guarantees of autonomy, and specified its investigative jurisdiction, which includes corruption offenses committed by top-level officials, members of parliament, judges, and executives of state-owned enterprises [22]. In 2019, in response to a decision of the Constitutional Court, the Parliament amended the law to clarify provisions concerning the appointment of NABU's director, thereby aligning the legal framework with constitutional requirements [28]. Overall, the Law on NABU significantly enhanced the institutional capacity of the state to investigate and prosecute high-level corruption.

Following the adoption of the foundational legal framework for the prevention and counteraction of corruption, further legislative developments were introduced to establish the Specialized Anti-Corruption Prosecutor's Office (SAPO). SAPO was formally created within the framework of the 2015 amendments to the Law of Ukraine «On the Prosecutor's Office», which introduced a special procedure for the selection of anti-corruption prosecutors [20]. During 2015–2016, the Prosecutor General issued a series of orders approving the Statute of SAPO, determining its staff composition, and appointing the first prosecutors on a competitive basis. Subsequently, Law No. 578-VIII introduced provisions aimed at strengthening SAPO's institutional independence, including the establishment of a distinct legal status, competitive selection of personnel, and transparent disciplinary procedures [5].

A major institutional milestone was reached in December 2023 with the adoption of legislative amendments that granted SAPO the status of a separate legal entity, thereby formally detaching it from the Office of the Prosecutor General [26]. These changes significantly enhanced the agency's autonomy, as the prior arrangement had allowed for potential interference by the Prosecutor General in the activities of anti-corruption prosecutors.

In pursuit of the establishment of specialized courts to adjudicate corruption-related cases, the Law of Ukraine «On the High Anti-Corruption Court» was adopted in 2018 [18]. This law delineates the specialization, jurisdiction, and procedures for forming the High Anti-Corruption Court (HACC). Notably, it introduced the unprecedented participation of the Public Council of International Experts in the judicial selection process, thereby ensuring a high level of integrity and professionalism within the HACC judiciary. For the first time in Ukraine's judicial history, independent international experts were granted veto power over candidates deemed to lack integrity. These provisions received a positive assessment from the Venice Commission [25].

The HACC is authorized to adjudicate criminal proceedings initiated by NABU and prosecuted by SAPO, as well as to rule on related matters such as pre-trial detention, plea bargains, and confiscation orders. Moreover, Ukraine has criminalized the offense of illicit enrichment of public officials through amendments to the Criminal Code, thereby aligning national legislation with international anti-corruption standards. A particularly significant reform was the introduction of the legal concept of special confiscation, which allows for the seizure of property obtained through criminal conduct even if it has been transferred to third parties. These legislative amendments also strengthened sanctions for bribery, fulfilling obligations under the United Nations Convention against Corruption and recommendations issued by the Financial Action Task Force (FATF) [5].

In 2019, the Law of Ukraine «On Amendments to the Law «On Prevention of Corruption» Regarding Whistleblowers» was adopted, substantially expanding the rights and legal protections of individuals who report corruption-related offenses [19]. For the first time, the law defined the legal status of a «whistleblower», providing for state protection, confidentiality guarantees, and the possibility of monetary rewards—up to 10% of the value of the corrupt transaction in the event of a successful investigation and conviction [28]. The National Agency on Corruption Prevention (NACP) was designated as the competent body for managing protected reporting channels and supporting whistleblowers throughout the process.

According to assessments by the OECD, Ukraine's whistleblower protection legislation is among the most progressive in Europe. It provides not only legal assistance to whistleblowers but also extends protections to their family members and grants the right to choose among various reporting channels [28]. The next step in this area was envisioned as the launch of a unified national whistleblower reporting platform, accompanied by awareness-raising campaigns to encourage greater public participation in anti-corruption reporting.

After a prolonged hiatus in strategic anti-corruption planning—during which the previous strategy expired in 2017—the NACP, in 2020, developed a draft Anti-Corruption Strategy for 2021–2025 [3]. This document was based on a comprehensive risk assessment across multiple sectors and underwent extensive public consultation [28]. Nevertheless, its formal adoption was delayed: only on 20 June 2022 did the Verkhovna Rada approve the Law of Ukraine «On the Principles of State Anti-Corruption Policy for 2021–2025», thereby enacting the Strategy [11, 17].

The 2021–2025 Strategy outlines priority areas for corruption prevention in key sectors such as public administration, the judiciary, defense, healthcare, and regulatory governance [17]. Its overarching objective is to create a coherent and effective anti-corruption system while fostering a societal culture in which corruption is no longer tolerated. As Allan Pagh Kristensen,

Head of the EU Anti-Corruption Initiative (EUACI), noted, the Strategy is «an ambitious roadmap that can provide renewed momentum in preventing and combating corruption, by offering viable alternatives to corrupt practices and fostering a culture of zero tolerance for corruption» [17].

To support implementation, a State Anti-Corruption Program for 2023–2025 was developed, detailing specific measures and performance indicators. The government approved this program in mid-2023, in accordance with the legislative requirement to do so within six months of the Strategy's entry into force. As of the end of 2023, Ukraine had thus established a complete set of strategic documents designed to coordinate anti-corruption efforts across all branches of government.

The cumulative effect of the aforementioned legislative changes has significantly aligned Ukraine's legal framework with international anti-corruption standards. Ukraine has implemented the majority of the requirements set forth in the United Nations Convention against Corruption [12] and the Council of Europe's Criminal Law Convention on Corruption [13], along with a range of other international anti-corruption instruments. For example, the introduction of electronic asset declarations and public registries of property ownership enabled Ukraine to fulfill the conditions outlined in the EU Visa Liberalization Action Plan [5]. However, it should be noted that the mere adoption of laws does not guarantee their effective enforcement.

Prevention constitutes a central pillar of Ukraine's anti-corruption policy, as it aims to reduce opportunities for corrupt conduct before it escalates into criminal behavior. Since 2014, Ukraine has introduced a series of preventive mechanisms, among which the most significant include financial transparency and control, conflict-of-interest regulation, public procurement reform, digitalization of public services, and the promotion of ethical standards.

One of the earliest and most consequential reforms was the introduction of mandatory asset and income declarations for public officials. In January 2015, the obligation to publish asset declarations of Members of Parliament was enacted, and by 2016, the Unified Electronic Declaration System was launched for all public servants [5]. Declarations are submitted online and made publicly available through an open-access registry, thereby enhancing the transparency of public officials' wealth and assets. Initially, the system targeted only a few thousand top officials, but its scope was later expanded to include all officials in categories A and B, as well as local self-government representatives (Article 51³ of the Law «On Prevention of Corruption») [21].

The NACP is responsible for verifying these declarations through both automated procedures (logical and arithmetic checks) and comprehensive risk-based audits. However, due to limited institutional capacity, the agency is only able to conduct in-depth reviews of approximately one thousand declarations per year—an extremely small fraction of the total volume submitted. It was not until late 2023 that the NACP introduced an automated monitoring system, incorporating algorithmic analysis and integration with state registries [5]. This technological upgrade is expected to significantly enhance the efficiency of financial control, addressing a previously critical weakness in the system. Prior to this, the absence of automation meant that a substantial number of violations went undetected due to the impracticality of manually reviewing hundreds of thousands of documents.

Electronic asset declaration has enabled the detection of numerous cases of unjustified enrichment and conflicts of interest. The NACP refers materials containing suspicious discrepancies or signs of illicit enrichment to NABU or other law enforcement agencies. Although a Constitutional Court ruling in 2020 temporarily blocked the mechanism for punishing false declarations, criminal liability was subsequently restored [28]. At present, a public official who deliberately fails to submit a declaration or includes false information exceeding a legally defined threshold may be held criminally liable. Sanctions range from fines and community service to imprisonment for up to two years in cases involving significant sums.

Nevertheless, the principle of inevitability of punishment in this domain remains only partially realized. Many cases result in lenient penalties. Studies have shown that, particularly in the initial years following the reforms, courts frequently imposed suspended sentences or minimal fines on corrupt officials [28]. Only with the operationalization of the High Anti-Corruption Court (HACC) was a more stringent approach to sentencing observed, contributing to the emergence of precedents for effective accountability.

Legislation requires public officials to prevent both actual and potential conflicts of interest in their professional activities. If an official has a private interest in a decision they are responsible for making, they must disclose it and refrain from participating in the decision-making process. The NACP has developed comprehensive guidance and methodological recommendations on identifying and managing conflicts of interest. Each public institution has designated authorized anti-corruption officers tasked with ensuring compliance with these rules.

In addition, an open register of individuals convicted of corruption-related offenses (commonly referred to as the «corruption offenders register») has been established, listing those who have been held liable for such violations [10]. Since 2020, the NACP has also launched and continued to expand online courses and certification programs for civil servants, focusing on ethical behavior and the management of conflicts of interest, with the aim of cultivating a culture of integrity within the public sector [14].

However, challenges persist in terms of practical enforcement. While mechanisms for managing conflicts of interest are formally in place, judicial practice in applying sanctions for violations remains limited. Despite the comprehensiveness of the legal framework, the OECD has noted that «the level of enforcement by the judiciary remains low», as many violations either go unnoticed or are inadequately addressed in court proceedings [28]. These findings underscore the need to enhance both the institutional capacity of public authorities and the responsiveness of the judiciary in applying existing preventive norms effectively.

An important milestone in the development of Ukraine's anti-corruption system was the reform of public procurement. Corruption in public procurement had traditionally constituted one of the most prominent sources of abuse and rent-seeking. In 2015–2016, Ukraine launched the electronic public procurement system «ProZorro», which has been recognized as one of the

most successful anti-corruption initiatives in the country [6]. As of 1 August 2016, the use of ProZorro became mandatory for all state institutions and state-owned enterprises for the procurement of goods, services, and works above threshold amounts [29].

The system ensures transparency and open competition by making all tender announcements, participants' proposals, and auction results publicly accessible online. ProZorro reduces opportunities for collusion and kickbacks, as all information is publicly available and preserved in a digital format, enabling subsequent audits [29, 28]. According to the Ministry of Economy, the implementation of ProZorro saved tens of billions of hryvnias in public funds during its first years of operation, and the number of tender participants increased, indicating stronger competition.

Nevertheless, some unscrupulous actors attempt to circumvent the system—for example, by splitting contracts to fall below the threshold for electronic procurement or misusing exemptions such as negotiated procedures for defense needs. In recent years, legal reforms have reduced the thresholds for mandatory e-tenders, expanded the scope of the Law on Public Procurement, and increased liability for violations. In addition, the DoZorro civic monitoring platform was created, allowing independent observers and businesses to provide feedback and report procurement violations [1]. Oversight bodies such as the State Audit Service and the Antimonopoly Committee monitor high-risk tenders [24]. While corruption in procurement has not been eradicated entirely, the overall level of transparency has increased substantially, and Ukraine has emerged as a global leader in open data on public tenders.

The broader digitalization of public administration, under the banner of «a state in a smartphone», has become another effective tool for reducing petty corruption. The 2020 launch of the Diia mobile application and online portal enabled citizens to access dozens of government services electronically. The digitization of public service delivery minimizes direct contact between citizens and public officials, thus reducing opportunities for bribery in exchange for expedited or favorable decisions. Analytical assessments have highlighted that the Diia platform is the result of a collaborative effort between the Ukrainian government and international partners (particularly USAID) aimed at enhancing transparency in governance [27].

Users can now submit applications and complaints online, which leaves a digital trace and complicates attempts at covert manipulation. Moreover, internal government processes are being digitized, including electronic document workflows, state registries, and automated verification systems (e.g., for asset declarations). These measures fall under the broader category of «digitalization against corruption», consistent with global best practices. They reduce human discretion and subjectivity in decision-making by public officials and introduce standardized, algorithm-based procedures.

Finally, the promotion of a culture of integrity represents a long-term but essential dimension of corruption prevention. Since 2014, the activities of civil society organizations, educational institutions, and media outlets in the field of anti-corruption education have significantly intensified. University curricula—especially in legal and public administration programs—have incorporated courses on anti-corruption policy and compliance. Investigative journalism plays a vital role, not only by exposing specific corruption cases but also by demonstrating their negative societal consequences, thereby fostering public condemnation of corrupt behavior.

With the support of international partners (including the EU and UNDP), various public awareness campaigns have been implemented to promote the values of integrity and social intolerance of bribery [4].

4. Conclusions and prospects for further research

Over the past decade, Ukraine has undertaken a comprehensive overhaul of its anti-corruption architecture, encompassing both institutional and regulatory dimensions. As a result of the post-2014 reforms, a coherent anti-corruption infrastructure has been established, incorporating a range of specialized institutions—including NABU, NACP, SAPO, HACC, and ARMA—operating on the principles of transparency, independence, and accountability. The development of a legal framework to ensure the functioning of these bodies, as well as the adoption of the Anti-Corruption Strategy for 2021–2025 and the corresponding State Anti-Corruption Program, reflects the state's commitment to systematic anti-corruption efforts aligned with European standards.

Nevertheless, the findings of this study reveal a number of persistent challenges that continue to hinder the effectiveness of anti-corruption policy. These include political interference in personnel decisions, insufficient enforcement of legal provisions, limited institutional capacity for data verification, and the incomplete implementation of digital oversight tools.

Looking ahead, the success of Ukraine's anti-corruption agenda will depend on several key factors: reinforcing the institutional independence of anti-corruption bodies, improving inter-agency coordination, strengthening the analytical capacity of public institutions, and ensuring the full deployment of automated control systems. The implementation of these measures will not only help reduce the prevalence of corruption but also accelerate Ukraine's integration into the European legal and institutional framework.

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