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Evaluation of effective anti-corruption strategies in State Institutions

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Scopo dello studio è di fornire una valutazione sistematica delle specificità delle strategie anticorruzione in Kosovo, Armenia, Ucraina e Mongolia nel contesto del funzionamento delle istituzioni statali. Lo studio analizza il fenomeno della corruzione e consente di determinare il suo pericolo per lo sviluppo del paese e di formulare aree specifiche di attività statale strategica.

The aim of the study is to provide a systematic assessment of the specifics of anti-corruption strategies in Kosovo, Armenia, Ukraine, and Mongolia in the context of the functioning of state institutions. The study analyses the phenomenon of corruption, determining its danger for the country's development and formulating specific areas of strategic state activity.

Summary: 1. Introduction.- 2. Materials and Methods.- 3. Results.- 4. Discussions.- 5. Conclusions.

1. Introduction

The national formation of an anti-corruption strategy in state institutions is one of the key tasks of a modern democratic state, which should be accompanied by effective legislative regulation. The constant complication of corruption schemes and the emergence of new forms of abuse require the search for innovative ways to fight corruption and implement them in the national legal system. From this standpoint, attention should be focused on the variety of anti-corruption areas of state activity, which primarily consist of improving the legal mechanisms for the functioning of institutions implementing anti-corruption policies and increasing the transparency and accountability of government structures. However, the examination of different models and strategies for combating corruption remains a complex process since the assessment of the experience of countries that demonstrate positive steps in the context of building anti-corruption policies should include the investigation of the competence of various state institutions that should act in cooperation and implement their specific function. Moreover, the legislative regulation of anti-corruption mechanisms is conducted by a large number of regulatory legal acts, which makes it difficult to understand the systematic implementation of the state strategy.

Corruption is one of the essential factors that hinder the development of any modern democratic country. This thesis on the example of Kosovo was considered in the paper of F. Curri, where, in particular, the competence and scope of activities of the main anti-corruption structures were considered[2]. However, the disadvantage of this study is the lack of analysis of the functioning of the Anti-Corruption Agency (ACA), which excludes the possibility of evaluating the effectiveness of its activities. Assessment of the effectiveness of state institutions in combating corruption should primarily be based on an analysis of the legislative framework in this area, which is the basis for further development. In part, the concept of a corrupt system in Kosovo was discussed by X. Ibrahimi, considering the concept of corruption itself in addition to its impact on the formation of the legislative framework in this area[3]. However, the obvious disadvantage of this study is the lack of identification of certain elements of the anti-corruption system in Kosovo and problems of legal regulation, in particular, based on the conclusions of international experts.

The introduction and improvement of corruption mechanisms is a strategically important activity of the state in the context of combating corruption. The examination of this phenomenon was the basis for the study by Y. Leonov et al., which analyses the Ukrainian anti-corruption strategy and its effectiveness in the context of modern challenges. Thus, the authors noted the existence of a single main specialised body in the country, but the paper does not investigate the situation of the Supreme Anti-Corruption Court of Ukraine, which is a key institution for the implementation of the judicial function in relation to corruption offences, which limits the understanding of the subject[4]. Building a transparent declaration system plays a substantial role in improving civil society's confidence in state institutions. In this context, the study by E. Matevosyan et al., which evaluates the effectiveness of anti-corruption measures in Armenia and their impact on public perception of corruption, is notable[5]. From this standpoint, the authors mentioned the function assigned to the Commission for the Prevention of Corruption to monitor the financial declarations of civil servants, but, on the other hand, they did not consider the existing ways to bypass the declaration of their assets, which makes it difficult to ensure full transparency of government structures.

Improving public administration is achieved by implementing effective anti-corruption strategies. This thesis was substantiated in the paper of V. Nonik et al., which assesses the impact of measures taken by Ukrainian authorities on the transparency, accountability, and effectiveness of state institutions[6]. However, the authors did not assess the feasibility of allocating the main specialised body in the anti-corruption system of Ukraine and its impact on the effectiveness of the entire mechanism. The state's anti-corruption policy should also be aimed at ensuring that state institutions perform functions related to raising public awareness in the field of anti-corruption. Based on this, K. Oidov and G. Badnaa examined key tools that influence informing citizens about corruption issues in Mongolia[7]. The authors successfully emphasised the importance of the national program in the context of the formulation of the basic principles of the anti-corruption policy but did not consider the role of launching the e-Mongolia platform as a factor of influence on reducing the level of bribery and building more transparent conditions for the functioning of state institutions[8].

In view of all the above, the purpose of this study was to conduct a systematic assessment of the effectiveness of legislative and practical implementation of the national anti-corruption strategies in state institutions of such countries as Kosovo, Mongolia, Armenia, and Ukraine. One of the objectives of the study was to identify the key elements and mechanisms that form the anti-corruption systems of the examined countries. Another task was to establish the shortcomings that are inherent in anti-corruption state institutions and are manifested within the framework of their activities. The third task of the study was to formulate general anti-corruption models in the countries under consideration, considering the differentiation of functionality between different specialised bodies.

2. Materials and Methods

The study included an analysis of the shortcomings and advantages in the legal regulation of anti-corruption measures, which allowed assessing the effectiveness of practices in different countries. Thus, the examination of the structure, content, and legal technique of regulatory acts regulating anti-corruption was implemented using the formal legal method, which allowed conducting a theoretical and legislative analysis of the concepts used in the legislation regulating the institute of anti-corruption activities, formulating the scope of competence and strategic importance of state institutions in building anti-corruption policies.

The implementation of this goal required a comparative analysis of anti-corruption systems in different countries, which allowed comparing different and similar models of state policy implementation in the study area. This allowed the identification and comparison of the main features of different legal approaches, demonstrating the differences between the legislation of different states in regulating issues that arise in public relations regarding the fight against corruption.

The study analysed the components of anti-corruption strategic policy, which included the legislative framework, organisational structures, control and supervision mechanisms, and tools for increasing transparency and accountability. In this context, it was necessary to use the materials of leading scientific research, which contributed to a deeper understanding of the existing theoretical basis in the context of anti-corruption state activities and an objective assessment of the effectiveness of each practice, considering the national legislation and the real experience of a particular country.

The legal basis of the study was primarily the legislation of Ukraine, Kosovo, Mongolia, and Armenia in the field of anti-corruption. The key legislative act in Ukraine was the Law of Ukraine "On the Prevention of Corruption"[9], which regulates all the main mechanisms and powers of the National Agency for the Prevention of Corruption. The assessment of Mongolian practice was based on

the examination of the Law of Mongolia "On the Anti-Corruption", which determines the priority areas of state policy and the competence of specialised institutions[10]. The examination of the national strategy of Armenia was based on the analysis of the Judicial Code of the Republic of Armenia, Law of Armenia "On the Corruption Prevention Commission"[11] and Law of Armenia "On the Anti-Corruption Committee"[12], which are defining acts in the context of ensuring the function of judicial review of corruption offences and monitoring the activities of state institutions[13]. The review of the anti-corruption strategy of Kosovo was based on the examination of the Law of Kosovo "Against Corruption" and Law of Kosovo "On the Anti-Corruption Agency", where all the measures in this area provided for by the current legislation were formulated on the basis of these documents.
The study also used indicators collected by Transparency International and reports from international experts[14]. The indicators and conclusions contained in these sources were used to conduct a comprehensive assessment of the implementation of state anti-corruption measures in practice, which eventually allowed formulating a clear position on the real situation of institutions implementing national anti-corruption strategies.

3. Results

Corruption as a form of social interaction is a complex and multifunctional phenomenon with its nature, dynamics, structure, and scale. This is a universal social phenomenon, the roots of which go back to the distant past. Corruption is not associated with a particular type of political system – it exists both in repressive totalitarian regimes and in liberal democratic societies. The spread of corruption and bribery threatens the development of any country as a democratic state with an efficient economy, impairing the functioning of the civil service[15]. As a result, this poses a threat to the country's economic security and undermines its position in the international arena. Based on the above, an effective fight against corruption requires not only political will but also a proper legislative framework, the creation of an effective system of state bodies, leadership in the development and implementation of anti-corruption policies, and measures to prevent and overcome corruption. In this context, the state policy should be aimed at forming a so-called strategy in the field of combating and preventing corruption, where this vector of activity should be understood as the functioning of the state administration and the actions of citizens of a particular state, foreigners, and stateless persons who are legally located within the country, aimed at identifying, analysing, limiting, or eliminating factors that cause corruption offences or contribute to their spread[16].

An essential element of anti-corruption is its implementation on the basis of a specific state strategy, which aims to systematically improve certain areas of activity that may affect the level of threat of this phenomenon. Thus, as part of the study, the fundamental vectors of such activities were identified, which should be considered when building an anti-corruption policy (Table 1).

Table 1. Strategic directions of state activities in the field of anti-corruption.

Reform and formation of anti-corruption state institutions	Formation and reform of specialised bodies responsible for combating corruption, among the functionality of which should be the implementation of Investigations, monitoring, and preventive measures in the field of corruption offences
Judicial system	The creation of an independent and effective judicial system that ensures objective consideration of corruption cases and fair sentences that are not related to any outside influence on the decision made
Legislative system	The creation of high-quality and effective legislation that builds clear terminology in the field of corruption offences, establishes a fair mechanism for bringing to justice for corruption actions and regulates the functioning of anti-corruption policy bodies
Transparency and accountability	Building an anti-corruption mechanism based on the principles of transparency and accountability, which should be ensured by the introduction of electronic platforms for public procurement, asset declarations, property registration, and accompanied by an open publication of information on public finances, budget expenditures, and the activities of officials

Cooperation with the public	Regular communication with civil society, which ought to be implemented with the assistance of the effective functioning of independent media and non-governmental organisations
Cooperation with international organisations	Cooperation with international organisations and participation in international agreements, such as the United Nations Convention Against Corruption, which sets standards and obligations for participating countries, contributes to ensuring that the state anti-corruption system meets international requirements

Thus, it can be concluded that anti-corruption is a priority vector of activities of state bodies at all levels, which includes holding various events in various fields. Successful counteraction to corruption will contribute to the development of a democratic, legal, and economically stable state, which will contribute to improving the standard of human life. Further consideration of this issue will focus on assessing the implementation of legislative regulation in the activities of state institutions and their evolution in different countries under the influence of common reform strategies.

According to the Corruption Perception Index of Transparency International, Mongolia received only 33 points out of 100 possible in 2023. Such an indicator on the part of international organisations negatively affects foreign investors, which forces the Mongolian government to fight corruption more actively.

According to economic experts, corruption has remained a severe problem for Mongolia for decades, leading to losses in state revenues and slowing economic growth[17]. The Government of Mongolia must actively fight corruption in all areas to attract substantial foreign investment, especially in public procurement and service delivery. In recent years, there has been some progress in the fight against corruption, which is recognised by international organisations. For example, in 2020, the e-Mongolia electronic platform was launched, which helped reduce bribery at lower levels in the field of public services. In addition, the Mongolian government has declared 2023 and 2024 to be the "years of fighting corruption". This highlights that the eradication of corruption affects not only the country's development but also its international reputation and the fulfilment of its obligations to the UN since, in 2006, the state ratified the Convention Against Corruption[18].

At the legislative level, anti-corruption in Mongolia is regulated by the Law "On the Anti-Corruption", according to Article 3 of which the term "corruption" is defined as an act that consists in the illegal use of official position to obtain material benefits, property services, or other benefits. Therewith, the analysis of this provision requires clarification that this definition does not include active actions of individuals (in particular on behalf of legal entities) aimed at bribing an official. Another disadvantage of this fundamental act is the lack of a mechanism for accountability of civil servants and limited access to information, which prevents the possibility of bringing offenders to justice. Notably, the existing mechanisms for protecting and encouraging whistle-blowers are unreliable, which hinders efforts to expose and effectively combat corruption.

In general, the National Anti-Corruption Authority in Mongolia adopted in 2023 is aimed at detecting corruption in the public and private sectors, political parties. It emphasises the need to convey to the public the idea that corruption is unacceptable for modern society and must be eradicated, in particular, through the conscious actions of citizens themselves. In this context, the goal set out in paragraph 3.2 of this programme is notable, where the development of state institutions in Mongolia, in particular, in the field of anti-corruption, should be to ensure the active participation of citizens and civil society organisations in the development, adoption, implementation, and evaluation of state policies, and to create conditions for policy formation and decision-making focused on the needs of citizens. However, a common disadvantage of this programme is the lack of measures to recover funds withdrawn from the country due to corruption, and the lack of legal mechanisms in Mongolia to verify the existence of offshore accounts of officials.

The Independent Anti-Corruption Agency (IACA) is Mongolia's specialised anti-corruption body, accountable to Parliament, established in 2007. In accordance with Article 18 of the Law of Mongolia "On the Anti-Corruption", the IACA conducts inspections in state institutions, provides recommendations, and monitors their implementation. In recent years, the agency has stepped up its preventive and policy work. In particular, it reviewed state funds, education and the judicial system, providing relevant recommendations. In 2018, the IACA assessed corruption risks in 24 ministries, and in 2019, it began evaluating 15 state-owned enterprises, including hospitals and universities. IACA actively cooperates with government agencies at the central and local levels. However, according to monitoring groups, the agency faces cooperation challenges and needs more support from government agencies and other stakeholders.

According to Subparagraph 5 of Article 18 of the Law of Mongolia "On the Anti-Corruption", the general police department has general powers over all criminal offences and supports investigations conducted by the IACA. Due to the lack of regional IACA offices, especially in rural areas, police investigators provide IACA support. All investigative actions and measures are approved and controlled by the prosecutor, while investigators do not have the opportunity to appeal the decision of the prosecutor's office. It is also necessary to state the absence of specialised anti-corruption courts. Therewith, practice shows that the existence of such courts is not necessary for the effective functioning of the anti-corruption system, which can be confirmed by the example of Denmark, where corruption cases are considered within the general justice system. On the other hand, Danish legislation provides for a certain substantial difference, which consists in the existence of a prosecutor's office system, which includes the state prosecutor's office for special crimes, which has specialised knowledge and experience in investigating serious financial crimes, including primarily corruption.

In 2023, Armenia ranked 62nd among the world's countries in the Corruption Perceptions Index[19]. However, according to analysts from Eastern Europe and Central Asia in the report of Transparency International, in the first period after the Velvet Revolution, the country saw substantial progress towards democratic and anti-corruption reforms[20]. Further progress in combating corruption has stalled, mainly due to the limited scale of these reforms. Moreover, experts noted that although there are security threats associated with corruption in Armenia, it has sufficient potential to overcome these difficulties and implement effective policy measures to make the fight against this phenomenon more systematic[21].

As already noted, a number of legal changes have taken place in Armenia in recent years, including new laws aimed at improving asset recovery mechanisms, new regulations on the protection of persons who disclose corruption schemes

(in particular, the Law of Armenia "On the Alarm System")[22]. An analysis of the provisions of this law allows asserting the establishment of the necessary legal framework for the protection of whistle-blowers but its effectiveness depends on how well the executive bodies comply with these provisions. Moreover, legally binding principles of integrity were established for civil servants, which simultaneously require professional training so that they understand and can apply these principles in their work. The institutional framework for combating corruption was also revised, resulting in the creation of the Anti-Corruption Committee of the Republic of Armenia. Despite these steps, it is noted that there are no substantial changes in the area of asset recovery and the need for further reforms to strengthen the integrity of the judicial system.
Firstly, the establishment of such a state institution as the Commission for the Prevention of Corruption (CPC) should be highlighted, established in 2019 under a special Law, which, according to the provision of Article 23 of this document, was assigned the function of monitoring the financial declarations of civil servants. This institution has the right to impose sanctions on those officials who do not meet the requirements for declaration. The CPC also analyses declarations, identifying inconsistencies, and can launch an investigation in case of potential cases of corruption. In addition, in accordance with Article 24 of the above-mentioned law, the institution provides anti-corruption education and training. Although the CPC powers have been strengthened since 2019, there are some gaps in the system of declaring the income of officials, especially in areas where there is an increased risk of corruption, such as police, customs, and healthcare. In practice, many officials can register their assets as the property of non-family family members, thus avoiding any unwanted verification of their financial interests[23]. An example of solving this problem is the experience of Germany, where declarations contain a variety of information about property, financial assets, income, deposits, real estate, and other financial interests of public officials, which is primarily based on the general provision of Article 33 of the Federal Law "On the Status of Civil Servants in the States". An important tool in this context is to ensure the principle of transparency, which is implemented through open access for the public to information collected in declarations[24].
Another important institution is the Anti-Corruption Committee of the

Republic of Armenia (ACC), established in 2021, which, in accordance with Article 4 of the relevant Law of Armenia "On the Anti-Corruption Committee", is a specialised law enforcement agency that investigates corruption cases and submits them to the prosecutor's office. The committee performs functions previously performed by the disbanded Special Investigation Service, which also investigated offences not necessarily related to corruption. Although the ACC was founded recently, its effectiveness in the fight against corruption has not yet been fully evaluated, and the committee has not yet published any reports on its work, it has nevertheless attracted the international community as a potential recipient of international assistance and has begun cooperation with the OSCE and the Swiss Development Agency, which provide technical support in the field of investigating corruption and economic crimes.
In April 2021, the Supreme Council of Armenia voted for amendments to the Judicial Code of the Republic of Armenia, which provided for the creation of such a court. Thus, according to Article 25 of the Judicial Code of the Republic of Armenia, the anti-corruption Court consists of 15 judges whose selection process lasted until 2022. Once fully launched, it consisted of specialised judges and support staff, which the Government of Armenia believes should contribute to a more efficient handling of corruption cases. Further development of the anti-corruption system has formed a system in which, in accordance with Article 28.1 of the Judicial Code of the Republic of Armenia, corruption offences can be reviewed in the Courts of Appeal by at least six judges, and in accordance with Clause 4 of the first part of Article 28, the appellate anti-corruption court with a minimum number of 12 judges, of which at least 6 must be specialized in investigating corruption crimes, at least 6 judges specializing in investigating anti-corruption civil cases. Based on this, it was concluded that Armenia has established a system that forms a clear nature of the consideration of proceedings, which should facilitate effective and objective decision-making in cases where corruption offences are the subject.
Given the Russian-Ukrainian war and the period of the legal regime of martial law, the fight against corruption has become critical for Ukrainian society. Therewith, the legal basis for regulating anti-corruption activities is the Law "On the Prevention of Corruption", the analysis of which gives grounds to conclude that anti-corruption policy is primarily aimed at "prevention", which is

reasonably associated with the prevention of violations of the law since corruption actions listed in the legislation are defined as offences. The effectiveness of the fight against corruption has increased due to systematic state activities on this issue, which began in 2014 due to the gradual integration of Ukraine into the EU. Since then, a number of special anti-corruption bodies have been established, the activities of which are directly related to the fight against corruption. In general, according to the Corruption Perceptions Index, Ukraine received 36 out of 100 possible points for 2023. Although this indicator represents a positive trend towards improvement compared to previous years, the situation is still unstable, which makes it necessary to further improve the anti-corruption system.

The National Agency for the Prevention of Corruption (NACP) is the main specialised anti-corruption structure established under the Law "On the Prevention of Corruption", which, in accordance with Article 4 of this document, performs a preventive function in relation to offences in this area. According to Article 11 of the Law, the main tasks of the NACP are to form an anti-corruption policy and prevent corruption. In addition, the functionality of this body consists in such vectors of activity as checking electronic declarations and reports of political parties, identifying conflicts of interest, developing a draft anti-corruption strategy and state programmes for its implementation, coordinating anti-corruption programmes of other bodies, drawing up administrative protocols for corruption offences of high-ranking officials, and conducting anti-corruption expertise of draft laws and acts of the Cabinet of Ministers of Ukraine. Therewith, it is worth comparing the Ukrainian practice with the British one, where the legislation does not allocate one main specialised anti-corruption body, and one of the most substantial, for example, can be called the National Crime Agency (NCA) and the Serious Fraud Office (SFO). Distinguishing between their competence, then according to Part 1 of Section 1 of the Criminal Justice Act, the NCA is a fully independent criminal prosecution body, covering the investigation of complex cases related to fraud and other even more highly specialised areas of criminal activity. Therewith, the NCA has broad policing powers in other areas, including analysing reports of money laundering, asset seizure, bribery. This division ensures the division of competence between different state institutions, which can affect the effectiveness of the functions of the bodies performed[25].

The key body that performs an operational function in the context of fighting corruption, i.e. investigating offences in this area, is the National Anti-Corruption Bureau of Ukraine (NABU). In general, the NABU acts as a state law enforcement agency created in accordance with a special law[26]. According to Article 1 of this Law, this body investigates corruption crimes related to high-ranking officials and substantial amounts of public funds, determining the jurisdiction depending on the nature of the crime, the damage caused, and the status of the subjects. On the other hand, the analysis of the provisions of this law allows asserting the limited financial and personnel restrictions of the body, which affects the speed and effectiveness of investigations. The existence of a Specialised Anti-Corruption Prosecutor's Office (SAPO) is notable, as an independent division of the Office of the Prosecutor General, it is responsible for procedural guidance and support of Public Prosecution in the High Anti-Corruption Court in cases investigated by the NABU. However, in practice, there were problems with the management of cases and the investigation of prosecutors, which led to delays and curtailment of high-profile cases. This highlights the need for better integration and coordination between the two bodies[27].

The last logical structure that conducts judicial review of corruption cases is the Supreme Anti-Corruption Court (SACC), which began its work a year after the adoption of the relevant Law and simultaneously, according to Article 4 of this normative legal act, it is a court of first and appellate instance. For almost five years, the transfer of cases to the Court of First Instance and the SACC Appeals Chamber indicates the readiness of the Ukrainian society to take active measures to counteract corruption phenomena in the country. During the first four years of operation, the Court of First Instance issued more than 130 decisions, and the VAKS Appeals Chamber considered more than 80 appeals. Therewith, during this period, NABU and SAPO, by the time SACC was formed, received only a little more than 30 sentences in cases of high levels of corruption[28]. Thus, it can be discerned that the work of SACC had a positive impact on the effectiveness and number of corruption cases considered, which primarily indicates the correct steps to implement the state strategy in the field of anti-corruption but simultaneously requires further changes and improvements.

The fight against corruption in Kosovo requires an integrated approach, primarily through the strengthening of the criminal justice sector. This requires close cooperation between key structures such as the police, the prosecutor's office, the courts, the ACA, tax and customs authorities, procurement authorities, and public organisations. Active exchange of Information, clear coordination at all stages of the judicial process and intolerance of corruption at all levels are key factors on the way to overcoming this problem, which is one of the key strategic goals of the Kosovo authorities.

Considering the previously mentioned rating compiled by the international organisation Transparency International, based on the Corruption Perceptions Index, it can be stated that Kosovo took the 83rd position among 180 countries. Although, according to a report by Transparency International, which indicates that substantial results have been achieved in the past decade (holding municipal elections without substantial shortcomings, adopting substantial amendments to the Law "On Conflict of Interest and Declaration of Property" in the first reading), according to experts, the implementation and compliance with anti-corruption norms remain a problem[29]. Firstly, this is manifested in the low level of punishment of high-ranking officials who violate the law and the widespread culture of impunity, which encourages corrupt behaviour.

The strategic regulatory act on which Kosovo's policy in the area under study is based is the Law of Kosovo "Against Corruption", article 1 of which provides for the regulation of anti-corruption measures, including administrative investigations into public corruption, elimination of the causes of corruption, issues of incompatibility between holding public office and conducting profitable activities for officials, restrictions on accepting gifts related to the performance of duties, supervision of their property, and on persons close to them, and restrictions on customers who participate in public tenders by conducting business with firms where an official or a person who is closely connected with them participates. In addition, the analysis of Article 6 of this Law factually gives grounds to assert the priority of the principle of transparency, which means the introduction into the structure of state institutions of mechanisms aimed at disseminating information about the work of state institutions in open-access to the public. However, according to a report by Transparency International, the provisions of this law on asset declaration and conflict of interest settlement are not always strictly implemented, and civil servants do not comply with these requirements, which undermines transparency and accountability of the government and anti-corruption bodies.

The anti-corruption system of Kosovo consists of various state institutions headed by the ACA, the Council of Judges, and the Council of Prosecutors of Kosovo. Notably, Kosovo does not have an effective mechanism for coordinating the activities of institutions responsible for detecting, investigating, and prosecuting cases of corruption, according to the report on the results of the United Nations Development Programme. As already mentioned, the main specialised body dealing with corruption-related issues in Kosovo is the ACA. In accordance with Article 5 of the relevant Law of Kosovo "On the Anti-Corruption Agency", the ACA investigates corruption offences, collaborates with local institutions, and foreign and international missions to prevent and combat corruption, develops an anti-corruption strategy, monitors and oversees the implementation of the anti-corruption strategy and action plan, participates and advises on the development of a code of ethics in the public and private sectors. Moreover, according to the information posted on the official website of the ACA, it operates in three strategic areas: implementation of the provisions of the law "On combating corruption", prevention and elimination of any corruption risks, training of citizens and officials in the current anti-corruption mechanisms.

The results obtained in previous divisions give grounds to assert that national anti-corruption strategies have substantial differences in each country. These differences are due to different approaches of legislators, the geopolitical location of countries, and other factors influencing the formation of state policy in the field of anti-corruption. Thus, based on the analysis of the legislation and activities of anti-corruption bodies in Kosovo, Mongolia, Armenia, and Ukraine, Table 2 allows the comparing of the advantages and disadvantages of each country in the context of the success of their anti-corruption strategies.

Table 2. Comparative table of state anti-corruption strategic measures.

	Kosovo	Mongolia	Armenia	Ukraine

Corruption Perceptions Index	41 points out of 100 (83rd place out of 180)	33 points out of 100 (121st place out of 180)	47 points out of 100 (62nd place out of 180)	36 points out of 100 (104th place out of 180)
Fundamental strategic document	Law of Kosovo "Against Corruption"	Anti-Corruption Program 2023-2030	Ministry of Justice of the Republic of Armenia	National Agency for the Prevention of Corruption
Priority areas of activity defined in the strategic document	Development of preventive measures and control over the activities of civil servants	Involvement of the public in the formation of anti-corruption state policy	Strengthening systems of good and ethical behaviour among civil servants, improving mechanisms for the return of unjustified assets	Measures to prevent corruption and ensure the inevitability of responsibility for corruption
Availability of the main specialised anti-corruption body	ACA	-	Anti-Corruption Committee of the Republic of Armenia and Commission for the Prevention of Corruption of the Republic of Armenia	National Agency for the Prevention of Corruption
Availability of a specialised anti-corruption court	-	-	Anti-corruption Court of the Republic of Armenia	Supreme Anti-Corruption Court of Ukraine

Comparing Kosovo and Ukraine, it should be noted that these countries are largely dependent on the support of international organisations, such as the EU and the UN, which contributes to the implementation of effective anti-corruption measures. Therewith, in Kosovo, as in Ukraine, there is a main specialised body (ACA), which, primarily, in accordance with the Law of Kosovo "Against Corruption", is designed to implement a coordination function, but it is necessary to state the lack of resources and independence due to political influence. A number of other specialised bodies were created in Ukraine, in particular NABU, SAPO and SACC, which had a positive impact on the success of anti-corruption measures. The introduction of electronic property declaration systems and open tenders Prozorro is also notable, which has affected the transparency of the functioning of state institutions. The presence of political pressure and resistance to reforms remains a substantial challenge for Ukraine, similar to Kosovo.

Armenia and Mongolia are also reforming their state anti-corruption systems, which, in particular, is manifested through the formation of new anti-corruption institutions. Thus, Armenia, after the Velvet Revolution of 2018, created new specialised bodies (Commission for the Prevention of Corruption of the Republic of Armenia and the Anti-Corruption Committee of the Republic of Armenia) but faces challenges related to ingrained corruption practices, which, for example, is implemented through the use of schemes that make it impossible to assess the wealth of civil servants. In addition, it is necessary to positively emphasise the formation of a specialised anti-corruption court, which, as in Ukraine, allowed to distinguish corruption cases between judges and improve the effectiveness of their consideration. Mongolia, in turn, has introduced new anti-corruption legislation and actively cooperates with international organisations to implement best practices, but the fight against corruption among high-ranking officials and social problems such as poverty complicate the reform process. Both countries face the need not only for legislative transformation but also for strengthening institutional capacity and changing public consciousness, where Mongolia has achieved greater success, focusing its strategic activities on involving the public in the development of anti-corruption policy.

In general, an effective fight against corruption in all these countries requires not only legal changes but also political will, cultural changes, and public support. Achieving these goals will contribute to strengthening democracy and ensuring sustainable socio-economic development in the regions.

4. Discussions

The results of the study allowed identifying the specific features of state strategies in the field of anti-corruption, which included an analysis of legislation in this area and the competence of special anti-corruption bodies, the purpose of which is combating this phenomenon. Thus, in this context, the advantages and disadvantages of anti-corruption strategies and systems in such countries as Kosovo, Armenia, Ukraine, and Mongolia were described, and their experience was compared with the effective practices of other states. However, the assessment of the effectiveness of state institutions in the field of anti-corruption is a relevant subject in the scientific environment, which requires comparing the results obtained with existing developments in the field under study.

According to the study, over the past few decades, anti-corruption policies have intensified in various regions of the world. Therewith, the special relevance of this issue in Europe is notable, which was analysed in the paper of E. Carloni and M. Gnaldi. In their study, the authors evaluated the effectiveness of state institutions in European countries by conducting a comparative analysis of the response of governments and anti-corruption bodies in the region to current challenges in the field of corruption prevention. Given this, the conclusion of researchers about the importance of fixing in national strategic documents the vector of activities aimed at rooting in the public opinion about the danger and inadmissibility of corruption in all its manifestations can be agreed with, which, in particular, confirmed by the example of Mongolia in this study[30].

The effectiveness of the functioning of anti-corruption bodies is related to their level of independence from other state structures, which can be achieved by granting them special status and legal guarantees[31]. This issue in the context of Kenya was examined by Y. Daud, concluding that a specially formed Ethics and Anti-Corruption Commission had not reached any substantial conviction, which is justified by the lack of legal guarantees, limited capabilities of whistle-blowers, and insufficient financial and human resources for the independent functioning of the anti-corruption body. It is difficult to disagree with this conclusion, which, however, requires clarification in the aspect that the main specialised body must necessarily be endowed with the ability to perform a coordination function and really influence the formation of the state anti-corruption strategy so that it can effectively and independently take actions related to the fight against corruption[32].

The Corruption Perceptions Index is currently one of the most authoritative and demonstrative indicators of the effectiveness of the state anti-corruption policy[33], which was considered in the study. In accordance with this, K. Gadowska analysed national anti-corruption measures in Poland, where special attention was paid to the implementation of government anti-corruption strategies and legislative changes that affect the indicator of the Corruption Perceptions Index. However, this study objects to the author in the context of levelling the importance of the formation of new specialised anti-corruption bodies since the study emphasises the importance of dividing competence between them, which affects the effectiveness of the anti-corruption policy[34].

Considering the European experience, it is also worth mentioning the study by M. Tihanyi and M. Kolaković-Bojović, which examines the experience of Serbia and Hungary. The authors stressed that effective anti-corruption measures include not only preventive and repressive actions in key areas of the state and society but also a powerful monitoring mechanism developed at the national level to monitor the overall state of affairs. Thus, commenting on this paper, the conclusion that the functioning of the monitoring system should rely on the main specialised body should be agreed with, where priority should be given to monitoring the financial declarations of civil servants[35].

In the context of forming an anti-corruption policy, it is important to ensure high-quality legal regulation of the situation of whistle-blowers, which was considered in the practice of Armenia. Thus, this phenomenon was also investigated by E. Mantzaris and M. Saruchera, highlighting the particular importance of legislative and regulatory measures that encourage citizens to become whistle-blowers who have a vital role to play. Therewith, the key deterrent remains the unsuccessful practical implementation of the protection of whistle-blowers in state organisations[36]. However, in contrast to this study, Armenia's experience suggests that strategic measures to regulate the situation of whistle-blowers should only be one of the components of anti-corruption policy, which should be organically combined with other purposeful measures, such as establishing legally binding principles of integrity for civil servants[37].

Systemic corruption is a factor that affects the existence and development of such phenomena as bribery or illegal use of official positions [38]. In this context, a study by S. Mtuwa and A. Chiweza can be mentioned, where, based on Malawian legislation, it is concluded that corruption is the main factor harming national development, as it undermines social and economic efforts, leading to poor service provision and inefficient functioning of state institutions. From this standpoint, it is necessary to object to researchers who did not consider the competence of specialised anti-corruption bodies, which did not enable the assessment of the decisive influence of such structures on the formation of a national strategy to combat systemic corruption[39].

Building an anti-corruption system in the country should be based on the conclusion of the most effective model, which will include legislative regulation of the competence of various state institutions, which, in their interaction, will be able to provide real counteraction to corruption phenomena. In view of this thesis, a paper of O. Odusote was reviewed, which analyses Nigeria's anti-corruption model and concludes that improving legislative regulation in this area can occur by merging the two main anti-corruption bodies. According to the study, the allocation of one key anti-corruption body can indeed bring concrete results, which was confirmed by the example of Ukraine, but the experience of the first-mentioned country indicates that the overall system should provide at least for the distribution of judicial, monitoring, and operational functions between different institutional structures to effectively fulfil the goals set[40].

The issues pertaining the African anti-corruption system were also considered in the study by N. Okpara and A. Mamman-Muhammad, which focused on the negative impact of public policy in this area on civil society, which should, in particular, be overcome by introducing mechanisms with open data, transparency and full responsibility of civil servants. Analysing this conclusion with the results obtained, it can be argued that the sample of countries, such as Germany, undoubtedly proves that ensuring open access to such data is crucial in ensuring the implementation of the principle of transparency and, accordingly, improving the public's attitude to the activities of state bodies[41].

Cooperation with the public is one of the key vectors of the anti-corruption policy, which contributes to improving confidence in the work of state structures[42]. Thus, the paper of A. Sarhan and F. Altiti is relevant in this section, where the authors concluded that it is important to provide adequate training and resources for public relations departments so that they can perform their tasks effectively, maintain an ongoing dialogue between government and the public that will help identify and address problems at an early stage. On the other hand, it is possible to only partially agree with the author since it is appropriate to mention the practice of Mongolia, where communicating the idea of the inadmissibility of corruption to the public is regulated at the highest level, in particular, in the National Program, which provides a specific understanding for state institutions and the public of the directions of policy development in the field of countering this phenomenon[43].

Thus, a general conclusion can be made that each state chooses its own path in the fight against this negative phenomenon, which in any case includes the creation of special anti-corruption bodies or a body that heads the entire system in this direction. Therewith, the creation of a common National anti-corruption Strategy is an important component that directs further state rule-making activities, which should meet the established goals and objectives but be accompanied by the provision of real powers to institutions that directly implement policies in this area to ensure the receipt of actual results.

5. Conclusions

Reducing the level of corruption remains one of the most important tasks of a modern democratic country, which is primarily achieved by high-quality legal regulation and the creation of anti-corruption institutions. Investigating this issue, it was established that the public danger of corruption as a systemic phenomenon lies in the threat to the country's economic security. The fight against corruption is the responsibility of the state, which is why the study noted the importance of building a national anti-corruption strategy, particularly in narrow areas such as ensuring the principle of transparency and reforming the judicial system.

Further evaluation of strategic measures in the field of anti-corruption included the examination of the Mongolian experience, which identified a strong rooting of this phenomenon, which can be argued by the state's chosen path to proclaim 2023 and 2024 to be the "years of fighting corruption". Thus, while implementing strategic tasks, the activities of the authorities were aimed at involving the public in improving the anti-corruption system. As a result, the effective work of the IACA was noted, as was the absence of specialised judges, whose formation, however, was determined not to be mandatory in Denmark.

Another subject of the study was the anti-corruption system of Armenia, where substantial progress was identified in the course of the work in connection with the formation of many anti-corruption bodies, which in their interaction form a system with an effective distribution of functionality between institutions. However, a problem with the declaration was noted, which was compared with the German experience, on the basis of which a recommendation was formulated to ensure the principle of transparency, in particular, through open public access to information.

Next, the national strategy of Ukraine was evaluated, where many specialised anti-corruption institutions are headed by the National Agency for the Prevention of Corruption, which forms a national strategy to combat this phenomenon. The creation of the Supreme anti-corruption Court, performing a judicial function, and the National Anti-Corruption Bureau, which performs an operational function, was positively noted in the context of the distribution of competence. After that, the anti-corruption system in Kosovo was deeply considered, where the national strategy is based on the implementation of the provisions of the fundamental legislative act that assigns a wide range of powers to the ACA.

Future research prospects may include a more detailed investigation of the impact of national strategic activities on civil society and the role of such measures on the effectiveness of anti-corruption measures. Also, in the future, researchers should assess the role of information and telecommunications technologies in the implementation of anti-corruption institutions' powers, particularly in the framework of monitoring declarations of civil servants.

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2. F. Curri, *Challenges of Republic of Kosova in her fight against corruption*, in *International Journal of Social Science Research and Review*, 5(7), 2022, pp. 383-397. https://doi.org/10.47814/ijssrr.v5i7.519.
3. X. Ibrahimi, *An institutional approach to governance and corruption in Kosovo*, in *Journal of Governance and Regulation*, 10(2), 2021, pp. 238-248. https://doi.org/10.22495/jgrv10i2siart5.
4. Y. Leonov, N. Fedirko, O. Bradul, M. Yunatskyi, A. Koldovskyi, *Effectiveness of*

mechanisms of anti-corruption management in modern conditions, in *Ad Alta: Journal of Interdisciplinary Research*, 14(1), 2024, pp. 45-50. http://dx.doi.org/10.33543/1401394550.
5. E. Matevosyan, A. Markosyan, M. Detloff, *Main issues and results of the assessment of perceptions of corruption in the Republic of Armenia*, 1, 2023. http://dx.doi.org/10.54503/1829-4324.2023.1-16.
6. V. Nonik, A. Tkachenko, T. Arifkhodzhaieva, O. Halunko, D. Trehub, *Enhancing governance through anti-corruption strategies: Exemplary approaches and obstacles*, in *Multidisciplinary Science Journal*, 6, 2024, e2024ss0704. http://dx.doi.org/10.31893/multiscience.2024ss0704.
7. K. Oidov, G. Badnaa, *Importance of anti-corruption awareness raising activities: Needs and factors*, in *Studia Philosophiae Et Juris*, 38(1), 2023, pp. 60-79. https://doi.org/10.5564/spej.v38i1.3163.
8. Anti-Corruption Program 2023-2030, 2023, in https://legalinfo.mn/mn/detail?lawId=16760139806351.
9. Law of Ukraine "On the Prevention of Corruption", 2014, in https://zakon.rada.gov.ua/laws/show/1700-18#Text.
10. Law of Mongolia "On the Anti-Corruption", 2006, in https://legalinfo.mn/mn/detail?lawId=8928.
11. Judicial Code of the Republic of Armenia, 2018, in https://translation-centre.am/pdf/Trans_ru/HH_Codes/HO-95-N_2018_100218_en.pdf.
12. Law of Armenia "On the Corruption Prevention Commission", 2017, in http://cpcarmenia.am/files/legislation/293.pdf.
13. Law of Armenia "On the Anti-Corruption Committee", 2021, in http://www.parliament.am/legislation.php?sel=showandID=7583andlang=armandenc=utf8.
14. Organisation for Economic Co-operation and Development, *Anti-Corruption Reforms in Mongolia*, 2019, in https://doi.org/10.1787/450db91e-en.
15. M. Warren, *Corruption and political institutions*, in *European Journal of Political Theory*, 23(3), 2023, pp. 405-410. https://doi.org/10.1177/14748851231186702.
16. D. Ginanjar, W. Purnama, *Optimizing legal strategies: combating corruption through anti-corruption education in universities*, in *Veteran Law Review*, 6(2), 2023, pp. 122-132. http://dx.doi.org/10.35586/velrev.v6i2.6477.
17. Organisation for Economic Co-operation and Development, *Anti-Corruption Reforms in Mongolia*, 2019, in https://doi.org/10.1787/450db91e-en.
18. United Nations Office on Drugs and Crime, *United Nations Convention Against Corruption*, 2004, in https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf.
19. Transparency International. Corruption perceptions index, 2023, in

https://www.transparency.org/en/cpi/2023.
20. Anti-Corruption Resource Centre, *Armenia: Overview of corruption and anti-corruption*, 2022, in https://www.u4.no/publications/armenia-overview-of-corruption-and-anti-corruption.pdf.
21. US Department of State, *Investment Review: A new institutional structure to counter corruption is being created in Armenia*, 2021, in https://arminfo.info/full_news.php?id=64115.
22. Law of Armenia "On the Alarm System", 2017, in https://www.arlis.am/DocumentView.aspx?DocID=172131.
23. Anti-Corruption Digest Armenia, 2019, in https://www.coe.int/en/web/corruption/anti-corruption-digest/armenia.
24. Law of Germany "On the Status of Civil Servants in the States", 2008, in https://www.gesetze-im-internet.de/beamtstg/BJNR101000008.html.
25. M. Saaida, *Democratic governance and anti-corruption efforts*, 2024, in https://www.researchgate.net/publication/377187926_Democratic_Governance_and_anti-corruption_Efforts.
26. Law of Ukraine "On the National Anti-Corruption Bureau of Ukraine", 2014, in https://zakon.rada.gov.ua/laws/show/1698-18#Text.
27. O. Sukhov, *Ukraine's anti-corruption bureau makes progress yet doesn't take on top presidential allies*, 2024, in https://www.yahoo.com/news/ukraine-anti-corruption-bureau-makes-183545225.html?guccounter=1.
28. Statistical reports of VAKS on administration of justice, 2024, in https://hcac.court.gov.ua/hcac/gromadyanam/reports/.
29. S. Brady, *Anti-corruption justice and collaboration in Kosovo: Challenges and recommendations*, in *U4 Brief*, 7, 2016, in https://www.cmi.no/publications/5968-anti-corruption-justice-and-collaboration-in.
30. E. Carloni, M. Gnaldi, *Preventing corruption in Europe: An interdisciplinary perspective*, in E. Carloni, M. Gnaldi (ed.), *Understanding and Fighting Corruption in Europe*, I Ed., Springer, Cham, Switzerland, 2021, pp. 1-4, in http://dx.doi.org/10.1007/978-3-030-82495-2_1.
31. A. Vilks, A. Kipane, *Economic crime as a category of criminal research*, in *Journal of Advanced Research in Law and Economics*, 9(8), 2018, pp. 2860-2867, in https://doi.org/10.14505/jarle.v9.8(38).35; A. Kipane, A. Vilks, A. Krivinch, *Forecasts of Long-term Progress in the Socio-cultural Sphere in the Context of Combating Economic Crime*, in *Pakistan Journal of Criminology*, 15(4), 2023, pp. 49-67; A. Tryhuba, T. Hutsol, M. Kuboń, I. Tryhuba, S. Komarnitskyi, S. Tabor, D. Kwaśniewski, K. Mudryk, O. Faichuk, T. Hohol, W. Tomaszewska-Górecka, *Taxonomy and Stakeholder Risk Management in Integrated Projects of the European Green Deal*, in *Energies*, 15(6), 2022, article number 2015, in https://doi.org/10.3390/en15062015.

32. Y. Daud, *A review of effectiveness of anti-corruption strategies and institutions in Kenya*, in *African Journal of Commercial Studies*, 4(4), 2024, pp. 303-318. https://doi.org/10.59413/ajocs/v4.i4.5.
33. M. Masyk, Z. Buryk, O. Radchenko, V. Saienko, Y. Dziurakh, *Criteria for governance' institutional effectiveness and quality in the context of sustainable development tasks*, in *International Journal for Quality Research*, 17(2), 2023, pp. 501-514, in https://doi.org/10.24874/IJQR17.02-13.
34. K. Gadowska, *National and international anti-corruption efforts: The case of Poland*, in *Global Crime*, 11(2), 2010, pp. 178-209, in http://dx.doi.org/10.1080/17440571003669191.
35. M. Tihanyi, M. Kolaković-Bojović, *Anticorruption challenges in Serbia and Hungary: In (efficient) monitoring of the anticorruption policies*, in *Journal of Criminology and Criminal Law*, 60(1), 2022, pp. 75-90, in http://dx.doi.org/10.47152/rkkp.60.1.5.
36. E. Mantzaris, M. Saruchera, *The realities of anti-corruption and whistleblowing: The case of Zimbabwe*, in *Africa Review*, 2024, in http://dx.doi.org/10.1163/09744061-bja10128.
37. O. Yu. Amelin, A.M. Kyslyi, P. Viacheslav, V. Rovnyi, Y. Surzhyk, *Independence of Prosecutors and Judges in Criminal Proceedings in Ukraine and Foreign Countries in the Context of International Practices*, in *Pakistan Journal of Criminology*, 16(3), 2024, pp. 191-207. https://doi.org/10.62271/pjc.16.3.59.74.
38. I.N. Shopina, D.G. Muliavka, S.K. Hrechaniuk, V.V. Fedchyshyna, *Improvement of social control as a direction of crime prevention*, in *Russian Journal of Criminology*, 13(3), 2019, pp. 447-454, in https://doi.org/10.17150/2500-4255.2019.13(3).447-454; D. Palko, T. Babenko, A. Bigdan, N. Kiktev, T. Hutsol, M. Kuboń, H. Hnatiienko, S. Tabor, O. Gorbovy, A. Borusiewicz, *Cyber Security Risk Modeling in Distributed Information Systems*, in *Applied Sciences (Switzerland)*, 13(4), 2023, article number 2393, in https://doi.org/10.3390/app13042393.
39. S. Mtuwa, A. Chiweza, *Implications of corruption on public administration in Malawi*, in *Journal of Humanities*, 31(1), 2023, pp. 91-112. http://dx.doi.org/10.4314/jh.v31i1.5.
40. O. Odusote, *Nigeria's anti-corruption model: Time for a review*, in *Advances in Social Sciences Research Journal*, 10(8), 2023, pp. 307-325. http://dx.doi.org/10.14738/assrj.108.15247.
41. N. Okpara, A. Mamman-Muhammad, *Imperatives of anti-corruption initiatives in enhancing public service delivery in Africa*, in *Ethics and Accountable Governance in Africa's Public Sector*, 2, 2022, pp. 105-129. https://doi.org/10.1007/978-3-031-04325-3_7.
42. V.I. Bocheliuk, V.V. Nechyporenko, M.A. Dergach, E.G. Pozdniakova-Kyrbiatieva, N.S. Panov, *Management of professional readaptation in terms of the modern Ukrainian society*, in *Astra Salvensis*, 2019, pp. 539-552; S. Yevseiev, O. Rayevnyeva, V. Ponomarenko, O. Milov, *Development of methodological principles for the construction of a corporate information educational system of innovative-active university in the framework of anti-corruption activities*, in *Eastern-European Journal of Enterprise Technologies*, 5(2-107),

2020, pp. 6-28, in https://doi.org/10.15587/1729-4061.2020.214895; A. Bekmuratov, I. Myrzaibraimova, K. Mamashov, B. Raimberdiev, D. Tookeeva, *Impact of leasing transactions on business development in Kyrgyzstan*, in *Scientific Bulletin of Mukachevo State University. Series Economics*, 11(3), 2024, pp. 21-33, in https://doi.org/10.52566/msu-econ3.2024.21.

43. A. Sarhan, F. Altiti, *The ability of public relations in government institutions to enhance transparency anti-corruption commission: A model*, in *Explore Business, Technology Opportunities and Challenges After the Covid-19 Pandemic*, 1, 2022, pp. 633-649. http://dx.doi.org/10.1007/978-3-031-08954-1_54.