

ASSESSMENT OF THE ANTI-CORRUPTION STRATEGY IMPLEMENTATION: SUCSESSES AND CHALLENGES

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POLICY
PAPER

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Successes and Challenges

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TABLE OF CONTENTS

Introduction

Overview of the Anti-Corruption Policy
Implementation

Conclusion

Recommendations

Appendix 1

INTRODUCTION

2014 saw the adoption of the Law of Ukraine on the Principles of State Anti-Corruption Policy in Ukraine (the Anti-Corruption Strategy) for 2014 – 2017, which defined the fundamentals of the state anti-corruption policy. In May 2015 the State Program, with a time-bound action plan, performance indicators and responsible agencies, was adopted to ensure its proper implementation. However, monitoring and evaluation of these documents were not carried out in 2015-2016. Correspondingly, the review of the above mentioned documents specifically provided by the State Program was not conducted.

The objectives of this research are: assessment of the Anti-Corruption Strategy for the period of 2014-2017 and the State Program for its implementation for the period of 2015-2016; identification of problems that remain unresolved or become apparent in the process of implementation of the state anti-corruption policy; and, formulation of recommendations for further actions which should be included in the Anti-Corruption Strategy and State Program (in its annual review) to address current problems.

The research was conducted in two stages. During the first stage, information about the state of implementation of the State Program by analyzing public data sources and requests for information submitted to responsible institutions was collected. During the second stage an expert survey was conducted by means of method of unstructured interviews in order to identify issues which remain vital in the spheres, implementation of anti-corruption activities which are provided by the Anti-Corruption Strategy and State Program. The conducted analysis resulted in the development of recommendations on further actions for the state anti-corruption policy implementation in 2017.

Moreover, the existence of political will to implement the state anti-corruption policy, the Strategy, the Anti-Corruption Program, as well as future prospects of their implementation were assessed. The collected data also enabled the authors to assess the progress in achieving the expected results of the state anti-corruption policy implementation.

The review contains information on implementation from January 2015 to February 2017. The information was collected from December 2016 to February 2017. The expert poll took place in February 2017.

OVERVIEW OF ANTI-CORRUPTION POLICY IMPLEMENTATION

Key accomplishments

Vital issues

FORMULATION AND IMPLEMENTATION OF THE STATE ANTI-CORRUPTION POLICY

- establishment of an institution entrusted with the powers to develop and implement the state anti-corruption policy – the National Agency for the Prevention of Corruption;
- creation of a coordinating advisory body to the President of Ukraine – the National Council on the Anti-Corruption Policy.

- the process of election of the NACP members allows to involve the public in this process, however, the process of selection leaves room for manipulation;
- inefficiency of the NACP, defective fulfillment of its functions;
- absence of a mechanism for the NACP employees performance assessment and impossibility to take appropriate measures in case of negative assessment of their work;
- incomplete institutional framework and staffing of the Agency, lack of financial and technical support, including IT infrastructure;
- lack of cooperation between civil society and the NACP, particularly in monitoring of the state anti-corruption policy implementation;
- ineffectiveness of the National Council for Anti-Corruption Policy, which operates as an advisory body to the President of Ukraine and performs the function of coordination in the anti-corruption policy;
- the mechanism of the Public Council at the National Agency for the Prevention of Corruption
 - formation is non-transparent and leaves room for manipulations with votes.

Key accomplishments

Vital issues

PREVENTING CORRUPTION IN REPRESENTATIVE BODIES

- introduction of public funding of political parties and imposition of stricter requirements for their financial accountability allowed to put into life 6 out of 11 GRECO recommendations on transparency of political parties finances;
- disclosure of a significant amount of information about the activities of the Verkhovna Rada of Ukraine due to the orders by the Head of the Verkhovna Rada.

- amendments of legislation on political parties funding did not ensure implementation of all GRECO recommendations;
- the analysis of political parties accountability is random, unsystematic, selective and incomplete; the process of imposition of sanctions for detected violations remains complicated;
- absence of the electoral legislation reform which is an important factor in political corruption prevention;
- the level of funding of election campaigns remains exceedingly high due to the absence of restrictions on political advertising, which, in its turn, promotes political corruption;
- absence of a legally fixed mechanism for public consultations on draft decisions of representative bodies;
- information on the activities of the Verkhovna Rada and local councils is not entirely open and public, there is no proper accountability of elected officials;
- there is no legal regulation of lobbying activities;
- the elected officials` low legal awareness of unethical and improper lobbying of private interests in representative bodies; absence of ethical conduct rules, their proper application and penalties for their violation.

Key accomplishments

Vital issues

CREATION OF GOOD PRACTICES IN CIVIL SERVICE

- adoption of the new Law of Ukraine "On Civil Service" which established the Procedure for Competitive Recruitment to civil service vacancies (the Competitive Recruitment Procedure) and is called to ensure depoliticization of the civil service;
- establishment of the Unified State Register of declarations of persons authorized to perform state or local self-government bodies functions. However, its smooth and proper functioning was not ensured;
- creation of clear mechanisms to resolve a conflict of interest among civil servants;
- implementation of ethical standards for civil servants.

- the amended Law «On Service in Local Self-Government Bodies» was vetoed by the President, which resulted in the delay of the implementation of advanced mechanisms for the selection and activities of the bodies of local self-government officials;
- absence of efficient verification of declarations of persons authorized to perform state or local self-government bodies functions, in particular due to the absence of the automated check system;
- absence of integrity checking;
- absence of mechanisms for whistleblower protection, despite the state guarantees; the NACP poor performance in working with whistleblowers.

| Key accomplishments | Vital issues |
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| PREVENTION OF CORRUPTION IN THE EXECUTIVE AUTHORITIES | |
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| <ul style="list-style-type: none"> · creation of tools for development and implementation of local anti-corruption policies – methodology for corruption risks assessment and recommendations on anti-corruption programs development; · adoption of legislation on introduction of corporate governance of state and utility companies. | <ul style="list-style-type: none"> · low professional competency level and qualifications of the majority of authorized persons responsible for detection and prevention of corruption in government agencies and local self-government bodies; delegating duties to persons engaged in other professional activities; · absence of an anti-corruption expertise of the National Agency for the Prevention of Corruption; imperfections in the methodology of anti-corruption expertise of the Ministry of Justice; · an extremely low rate of corporate governance of state and municipal enterprises` activities implementation; insufficient disclosure of information about their activities. |
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| PREVENTION OF CORRUPTION IN PUBLIC PROCUREMENT | |
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| <ul style="list-style-type: none"> · adoption of the new Law «On Public Procurement», which introduced new progressive mechanisms for public procurement activities and their analysis; ensuring maximum disclosure of information about public procurement activities and contracts; · launch of the e-procurement system «ProZorro» which provided ample opportunities for public procurement analysis and monitoring. | <ul style="list-style-type: none"> · absence of proper legal regulation of pre-threshold procurement; · absence of effective government control and monitoring of public procurement; · poor institutional capacity and limited authority of the State Audit Service in the sphere of public procurement; · lack of professionalism of the majority of tender commissions members responsible for public procurement. |
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| Key accomplishments | Vital issues |
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| PREVENTION OF CORRUPTION IN THE JUDICIAL SYSTEM AND CRIMINAL JUSTICE | |
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| <ul style="list-style-type: none"> · amendments to the Constitution on justice, which improved the mechanism of appointment and dismissal of judges, minimized political influence on this process, limited judges` immunity in case of a felony or a gravely serious crime commitment and detention of judges during or immediately after the crime; · adoption of the new Law «On the Judicial System and the Status of Judges», which enhanced anti-corruption mechanisms of the judicial system; allowed to create the Public Council of Integrity; introduced maintenance of judges` dossiers and submission of declarations of integrity and family relationships by judges and candidates for judicial appointments; · including broad descriptions of powers of the public prosecutor`s office in the Constitution; · adoption of the new Law «On the National Police». | <ul style="list-style-type: none"> · absence of sweeping reforms in the prosecution bodies and internal affairs agencies, which allows further corrupt practices; · possibilities to exercise political influence on the activity of prosecution bodies and the National Police; · indicators of improper implementation of the revised legislation on judicial reform; · inefficient running of integrity checking with respect to persons occupying public posts in prosecution bodies, formal approach to their implementation and absence of adequate sanctions for detected violations; · inefficiency of internal specialized units within the Public Prosecution Service and the National Police, responsible for detection and investigation of corruption offenses; · absence of qualitative analysis of corruption risks in the activity of prosecution bodies and internal affairs agencies; · new mechanisms for assessment of the effectiveness of prosecution bodies and internal affairs agencies activities have not been implemented. |
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| Key accomplishments | Vital issues |
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| PREVENTION OF CORRUPTION IN THE PRIVATE SECTOR | |
| <ul style="list-style-type: none"> · establishment of the Business Ombudsman Council and its effective operation; · simplification of certain businesses procedures; · collaboration with representatives of international organizations and businessmen to work out a typical anti-corruption program of a legal entity. | <ul style="list-style-type: none"> · lack of clarity in defining the powers of the Business Ombudsman Office and mechanisms for their implementation; · selective approach to simplification of business procedures, which does not drastically reduce the number of business and state contacts, and significantly simplify business activities; · instability of legislation; · absence of mechanisms for effective protection of property rights due to corruption in the judicial system; · absence of reforms in the State Fiscal Service, tax police and other law enforcement agencies involved in pre-trial investigation of economic crimes which resulted into cases of pressure on business; · absence of deterrent sanctions for corruption offenses for legal entities; · absence of proper notification of private sector about anti-corruption measures and anti-corruption legislation requirements. |

| Key accomplishments | Vital issues |
|--|--|
| ACCESS TO INFORMATION | |
| <ul style="list-style-type: none"> · adoption of laws on disclosure of information about the use of public funds, launch and operation of the appropriate web portal; · adoption of laws on disclosure of public information in the form of open data, launch of the web portal with publicly accessible data and release of such information; · legislative changes regarding disclosure of information about immovable property, registry of vehicles and the state land cadastre; · launch of pilot projects in the construction industry in compliance with the standards of the initiative CoST; · legislative amendments to ensure transparency in extractive industries, however, the changes proved insufficient. | <ul style="list-style-type: none"> · public funds managers' poor performance of their official duties of reporting on public funds allocation and spending; · absence of amendments in legislation on the right to access to public information, namely, on elimination of gaps and entrusting the Verkhovna Rada Commissioner for Human Rights office that controls observance of the right to access to public information with necessary powers; · disclosure of information about extractive industries activities is partial and often sabotaged by some extractive companies. |

Key accomplishments

Vital issues

LIABILITY FOR CORRUPTION OFFENSES

- establishment of specialized anti-corruption bodies that carry out pre-trial investigation (the National Anti-Corruption Bureau) and procedural guidance and representation in courts (SAPO – Specialized Anti-Corruption Prosecutor’s Office of Ukraine, which is a specialized structural unit of the General Prosecutor’s Office); provision of their institutional capacity, guarantees of independence and a high level of accountability;
- improvement of legislation on seizure and confiscation of property, obtained in a corrupt way;
- creation of the National Agency on detection, investigation and management of assets recovered from corruption and other crimes; election of the head of the institution, initiation of the Agency formation.

- existence of serious conflict situations between new anti-corruption law enforcement institutions and other law enforcement agencies;
- the political elite’s attempts to seize control over the National Anti-Corruption Bureau and Specialized Anti-Corruption Prosecutor’s Office of Ukraine through undermining their independent status and possibilities for efficient operation;
- sabotage of the National Anti-corruption Bureau and courts proceedings reviews;
- violation of the law during the competitive selection of the State Bureau of Investigation management members due to the involvement of two members of the validation committee without higher legal education;
- absence of criminal prosecution of legal entities, authorized persons of which committed corruption crimes.

Key accomplishments

Vital issues

FORMING A NEGATIVE ATTITUDE TO CORRUPTION

- adoption of the standard survey methodology of the level of corruption assessment, which allows to assess public understanding of the phenomenon of corruption and its prevalence;
- sociological surveys are being conducted to find out about certain government agencies contribution to implementation of civil society projects aimed at forming a culture of zero tolerance to corruption (e.g. the Ministry of Information Policy assistance in distribution of «TI Ukraine» information materials);
- partial implementation of anti-corruption academic courses in secondary schools (only optional courses for students);
- organization of discrete awareness-raising events for civil servants and elected officials, public activists.

- insufficient use of modern technologies in awareness-raising campaigns;
- absence of a proactive approach of authorities in their work on citizens` awareness-raising;
- lack of communication on the state of implementation of anti-corruption reforms in Ukraine, their nature and objectives;
- lack of cooperation between government agencies and civil society in forming a negative attitude to corruption in citizens;
- low legal awareness of citizens, namely, people do not understand the essence of the phenomenon of corruption and do not know how to act in case of detection of corruption.

CONCLUSION

The results of the analysis of the State Anti-Corruption Strategy and the State Program for its implementation show that these documents are of great importance, however, they do not fully cover the prevention and combating of corruption in specific areas. In addition, there are some discrepancies between the measures of the Anti-Corruption Strategy and the objectives of the State Program. Some cluster activities are overlooked by the State Program.

In general, it is possible to characterize the political will to implement the state anti corruption policy as weak. Unfortunately, numerous attempts are being made to block implementation of anti-corruption measures, both at the legislative level and the level of implementation; also it is essential to emphasize numerous attempts to reduce the effectiveness of new institutions and instruments through taking them under control by certain political groups or inadequate application.

In analyzing the state of the State Program implementation, it is essential to mention quantitative performance indicators as the most striking illustration of its accomplishments: 83 out of 210 tasks have been accomplished; 65 tasks have been partially accomplished or are still in progress. 17 tasks have not reached the deadline yet; 66 still remain unaccomplished despite the fact that their deadline has already passed.

Thus, the progress in reaching the objectives, although not always full and timely, is obvious. Instead, a significant number of unaccomplished and partially accomplished tasks shows that not all of them are performed efficiently and conscientiously.

It is necessary to emphasize that measures, provided not only by the Anti corruption Strategy, but also by the Action Plan on visa liberalization with the EU and the requirements of the IMF, were implemented most efficiently. Due to this fact Ukraine saw the establishment of new institutions and mechanisms of corruption prevention, detection and counteraction.

A significant number of accomplished tasks were essentially legislative amendments or regulations – the majority of these tasks have been accomplished. However, practical measures for their implementation and proper implementation of legislation are still problematic.

A late launch of the National Agency for the Prevention of Corruption as an institution responsible for implementation of the state anti-corruption policy had an extremely negative effect. Thus, the National Agency for the

Prevention of Corruption has to perform tasks at an accelerated pace. Also, absence of opportunities for proper assessment of the effectiveness of the NACP and doubts as to its objectivity and impartiality of some members of the apparatus and the NACP members while exercising their powers remain among negative points of the issue.

Implementation of certain measures provided by the Anti-Corruption Strategy met serious opposition from political leaders, the fact that indicates the political elite's unwillingness to contribute to combating corruption in Ukraine.

Comparing the current Anti-Corruption Strategy and State Program with previous documents on the state anti-corruption policy, it is necessary to note that the existing acts are more progressive and their implementation has been more efficient.

However, unfortunately, proper monitoring of the Anti-Corruption Strategy and State program, evaluation of the defined measures and reporting on their implementation have not been carried out for two years. Thus, accountability of responsible agencies and supervision over implementation were ineffective. In addition, the State Program has not been reviewed by the Cabinet of Ministers, despite the fact that it was provided by the Program itself.

It is essential to mention that the State Program and other strategic documents and action plans for their implementation have not been brought into line, which also has a negative effect on implementation of the state anti-corruption policy.

To reach the objectives set in the Anti-Corruption Strategy by the end of 2017 it is necessary to review the required measures for the State Program implementation, terms and responsible authorities. Moreover, it is necessary to study financial and technical support of agencies responsible for the measures' implementation and the effectiveness of its use as one of the major obstacles to comprehensive implementation of the measures is the lack of material resources. Attention should also be paid to enhancing competence and professionalism of the officials responsible for implementation of measures, provided by both the Anti-corruption Strategy and State program.

RECOMMENDATIONS

General recommendations:

1.1. To ensure adoption of ethical rules for the activity of electoral bodies and provide operation of the appropriate mechanisms of responding to violations of ethical rules by elected officials, particularly, in case of violation of norms of conflict of interest.

1.2. To ensure adoption and effective implementation of anti-corruption programs of government agencies and legal entities.

1.3. To analyze compliance of the Strategy of reforming the judicial system, court proceedings and related legal institutions with the Anti-Corruption Strategy; to ensure their conformity and proper implementation; to monitor implementation and report on reforms of the judicial system, prosecution bodies and internal affairs agencies.

1.4. To conduct analysis of corruption risks in the activity of prosecution bodies and internal affairs agencies; to develop and take measures to avoid them on the results of the analysis.

1.5. To ensure awareness-raising and educational events on prevention of corruption in business jointly with the private sector.

1.6. To conduct trainings for stewards of public information to explain legislative acts and ways of their implementation.

1.7. To conduct awareness-raising activities and campaigns, disseminate information to enhance public awareness of the phenomenon of corruption and its manifestations; to actively involve civil society in implementation of relevant measures in view of the experience and efficiency of civil society institutions in this sphere.

1.8. To enhance quality and clarity of information materials (step by step instructions, infographics, publications, etc.) for ordinary citizens; to organize awareness-raising and educational events to correctly determine campaigns orientation and appropriate communication channels for different social groups.

1.9. To promote the use of modern technologies in awareness-raising activities, namely, to develop and promote online courses, to conduct webinars, to provide an open access to online information materials etc.

To the National Agency for the Prevention of Corruption:

2.1. To work out a draft of the revised Anti-Corruption Strategy and State Program for its implementation within the terms provided by the State program, to ensure their consistency and compliance as well as necessary involvement of civil society in documents drafting and their wide discussion.

2.2. To continue educational events and trainings for the NACP staff to improve their qualifications and professionalism, in particular, through involvement of civil society representatives, experts of international organizations and foreign experts.

2.3. To ensure proper periodic assessment of the effectiveness of the authorized persons` and government agencies subdivisions` activities on detection and prevention of corruption; to publicize the results of such assessment and checks.

2.4. To ensure the launch and operation of the electronic system for submission and release of political parties reports on their property, incomes, expenses and financial obligations.

2.5. To conduct awareness-raising events and information campaigns for elected officials on the issue of conflict of interest and its ethical dimension; to work out and adopt methodological recommendations on conflict of interest settlement for MPs and local councils deputies.

2.6. To take all necessary measures to ensure smooth and proper functioning of the Single State Register of declarations of persons authorized to perform state or local self-government bodies functions.

2.7. To work out and ensure operation of a system of automatic verification of declarations of persons authorized to perform state or local self-government bodies functions as soon as possible.

2.8. To work out and adopt the procedure of inspection of officials` compliance with restrictions after they cease to perform state or local self-government bodies functions.

2.9. To organize awareness-raising events and information campaigns on the requirements of financial control and the system of electronic declarations.

2.10. To continue to conduct trainings for authorized persons and departments; to ensure proper control over implementation of anti-corruption programs norms; to work out a system of assessment of authorized

persons` and departments, civil servants` and local self-government bodies officials` knowledge of anti-corruption legislation.

2.11. To work out and adopt a methodology of anti-corruption expertise of legal acts for the National Agency for the Prevention of Corruption.

2.12. To publish a quarterly analytical report on the status of the Anti-Corruption Strategy and State Program implementation; to involve NGOs, foreign experts and experts of international organizations in preparation of analytical reports and assessment.

To the Verkhovna Rada of Ukraine:

3.1. To make legislative amendments on introduction of the annual independent institutional audit of the National Agency for the Prevention of Corruption and on the possibility of taking appropriate measures in case of a negative auditorial conclusion.

3.2. To amend electoral legislation in due compliance with the Venice Commission recommendations.

3.3. To amend legislation on political parties funding, in particular on compliance with the electoral legislation; ensure dissuasive and effective sanctions; to define the term «statutory activity of a political party»; to provide legal regulation of operation of an electronic system for submission and publication of political parties reports on their property, incomes, expenses and financial obligations.

3.4. To amend legislation to restrict the use of political advertising in order to reduce the costs of election campaigns.

3.5. To amend legislation on institutionalization of consultations of government agencies with the public (the Draft Law «On Public Consultations»).

3.6. To amend legislation to ensure openness of information about the activities of the Verkhovna Rada of Ukraine, parliamentary committees and MPs (the Draft Law «On Amendments to Some Laws of Ukraine on Ensuring Transparency and Access to Information about the Activities of the Verkhovna Rada of Ukraine, its Committees and People`s Deputies of Ukraine» (№1591 from 23.12.2014).

3.7. To amend legislation for the regulation of the organization of integrity checking with respect to persons occupying public posts in state of local administration (the Draft Law of Ukraine on Integrity Checking).

3.8. To amend legislation on enhancement of whistleblower protection

mechanisms, namely, through finalization and adoption of the Draft Law «On Whistleblower Protection and Disclosure of Information about Harm or Threat to the Public Interest» (№4038a from 07.20.2016).

3.9. To amend legislation to clearly define the term «an official of a legal entity of public law» and ensure dissemination of requirements of financial control and conflict of interest settlement for such officials.

3.10. To amend legislative regulation of sub-threshold procurement and ensure proper state control of public procurement.

3.11. To amend legislation to ensure the activity of the Business Ombudsman Institution (the Draft Law «On Business Ombudsman Institution» (№4591 from 05.05.2016).

3.12. To amend legislation to ensure the establishment and functioning of a financial investigations service (the financial police).

3.13. To amend legislation to impose sanctions for poor compliance with the requirements for open use of public funds (the Draft Law «On Amendments to Some Legislative Acts on Ensuring Openness of Information about the Use of Public Funds» (№5061 from 09.05.2016).

3.14. To amend legislation to enhance control over observance of the right to access to public information, compliance of laws on information, consideration of complaints about civil rights violations (the Draft Law «On Amendments to Some Laws of Ukraine on Access to Public Information Concerning the Improvement of Certain Provisions» (№2913 from 05.20.15).

3.15. To make legislative amendments aimed at enhancing the efficiency of the NABU, particularly regarding the right to autonomous reading of information from transport telecommunications networks; temporary restriction for judges to access court decisions made during pre-trial investigations of the National Anti-Corruption Bureau; to enhance the mechanism of cooperation with the investigation within the framework of fight against organized crime.

3.16. To amend legislation creating the Supreme Anti-Corruption Court and the Anti-Corruption Chamber of the Criminal Cassation Court of the Supreme Court; to provide competitive selection to anti-corruption courts, their proper financial and technical support and efficient operation.

3.17. To amend the Criminal Code and the Code of Criminal Procedure on liability of legal entities for corruption.

3.18. To provide quarterly discussion of the state of the anti-corruption

policy implementation on the basis of the Parliamentary Committee on Corruption Prevention and Counteraction with participation of the NACP representatives, other government agencies and NGOs.

3.19. To continue anti-corruption expertise of all draft laws on the basis of the Parliamentary Committee on Corruption Prevention and Counteraction.

To the Cabinet of Ministers and executive authorities:

4.1. To provide necessary financial and technical support for the National Agency for the Prevention of Corruption efficient operation.

4.2. To raise salaries for ordinary NACP employees to establish a competitive pay level.

4.3. To provide all NACP employees with access to all necessary registers and databases.

4.4. To finalize and submit to the Verkhovna Rada the Draft Law «On Public Consultations».

4.5. To improve the procedure of holding a competition for filling in positions in government agencies; to work out clear criteria for assessment of competitors; to ensure openness of information on assessment of candidates.

4.6. To develop a mechanism to ensure a competitive level of salary for civil servants and local self-government bodies officials.

4.7. To finalize and to submit to the Verkhovna Rada the Draft Law of Ukraine on Integrity Checking.

4.8. To adopt regulations aimed at ensuring corporate governance of state and utility companies; by the end of 2017 to implement a transparent competitive selection of members of supervisory boards for the 100 largest state enterprises of Ukraine;

4.9. To ensure development and amendment of the methodology of conducting an anti-corruption expertise for the Ministry of Justice.

4.10. Ensure reporting on the status of implementation of agreements that were signed on the results of public procurement procedures.

4.11. To ensure ProZorro system integration into other public registers in order to simplify the procedure of submission of the documents by the participants and their verification.

4.12. To provide a specialized body responsible for government supervision of public procurement procedures with adequate financial and technical resources and the necessary number of employees to ensure effective performance of its functions.

4.13. To expand the use of CoST standards in Ukraine taking into account previous positive experience.

4.14. To ensure competitive selection to the management of the State Bureau of Investigation in accordance with all legal requirements; to ensure efficient operation of the State Bureau of Investigation as required by legislation by November, 2017;

4.15. To take all necessary measures to start efficient operation of the National Agency for detection, investigation and management of assets recovered from corruption and other crimes; provide all necessary resources required for its efficient functioning.

4.16. To work out legislative amendments to the Criminal Code and the Code of Criminal Procedure on liability of legal entities for corruption.

4.17. To work out and start obligatory anti-corruption classes for schoolchildren at least once a year.

4.18. To provide regular informing about the negative impact of corruption and start anti-corruption legislation classes for students at institutions of higher education;

4.19. To consider possible ways of providing proper funding for implementation of all measures of the state Anti-corruption Policy, namely, through a separate budget program.

To non-government organizations:

5.1. To provide public monitoring of the Anti-corruption strategy and State program implementation, to publicize the results of such monitoring;

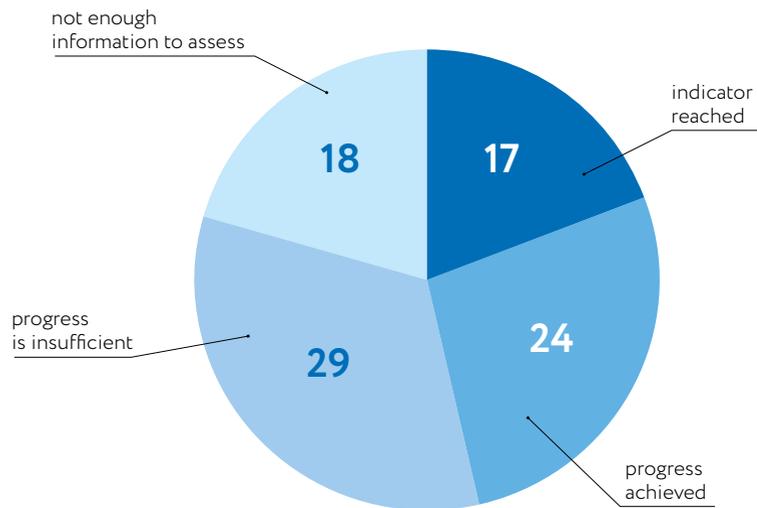
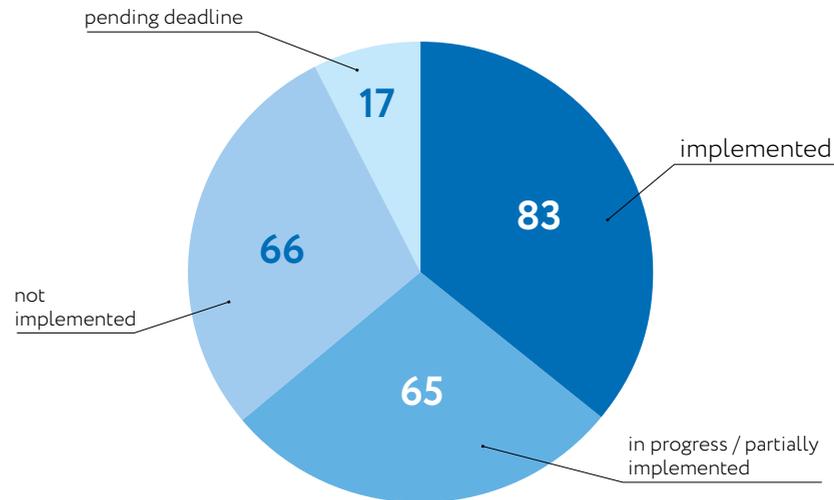
5.2. To cooperate with government agencies to effectively implement measures provided by the Anti-corruption Strategy and State Program.

5.3. Promote awareness-raising and educational events, to organize events in cooperation with government agencies;

5.4. To disseminate information on the state of the anti-corruption policy and anti-corruption measures implementation among the citizens.

APPENDIX 1

Progress in Implementation of the Anti-Corruption Strategy



ACREC

The Anti-Corruption Research and Education Centre at National University of “Kyiv-Mohyla Academy” is the first Research and Education Interdisciplinary Centre, where corruption is studied as a socio-political phenomenon; preventive methods against supportive to corruption environment and counteracting its effects are taught systematically. Interdisciplinary Research and Education Centre was founded by Anti-Corruption Action Centre, Transparency International Ukraine and National University of ‘Kyiv-Mohyla Academy’ in July 2015. First of all, the Center was established in order to carry out interdisciplinary research and launch of academic studying in counteracting the corruption.

The main goal of the Centre is to prepare a new generation of Ukrainian professionals in anti-corruption field by implementing interdisciplinary training programs and setting new standards for research.

The Anti-Corruption Headquarters

The Anti-Corruption Headquarters was founded in 2014 to unite efforts of Kyiv local anti-corruption activists. In 2016 the organization extended its geography to other regions of Ukraine as well as the national level. The main initiatives of the Anti-Corruption HQ include development and implementation of innovative tools to fight corruption, anti-corruption education for youth, monitoring and control over the public funds, fundamental analysis of anti-corruption legislation including development and advocacy of the new norms. The team of Anti-corruption HQ believes that corruption is easier to prevent than to fight with its consequences. Therefore, preventing corruption is a priority of the organization.



