

International legal mechanisms for preventing corruption: Analysis of effectiveness and prospects for use in developing the anti-corruption architecture of Ukraine

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Abstract. The purpose of the paper was to analyse international experience in combating corruption offences for its further integration into Ukrainian legislation. The study used such methods as system analysis, comparative-implementation, statistical and retrospective methods. The article conducted a systematic review of global concepts of corruption prevention. It is indicated that in the conditions of modern globalisation processes, borrowing successful foreign experience and implementing it into the current legislation of Ukraine is critically important. A number of preventive measures used by leading countries to prevent corruption offences are also analysed in detail. Particular attention was paid to the positive experience of countries with the lowest level of corruption, and ways to achieve such results are highlighted. The article considers the anti-corruption strategies of Singapore, South Korea, Finland, Sweden, the Netherlands, Belgium, the Slovak Republic, Israel, the Republic of Poland, Germany, Great Britain, Denmark, the United States of America, Canada, Romania, Estonia. It was pointed out that in countries with low levels of corruption, prevention models combine both repressive measures and comprehensive elimination of factors contributing to corruption. It was noted that a modern strategy for preventing corruption requires active cooperation between state bodies, law enforcement agencies and civil society in matters of prevention and combating corruption offences. An essential prerequisite for success in preventing corruption is also the growth of civil awareness. Given the European vector of Ukraine's development, there is an urgent need to develop and implement a modern anti-corruption policy. It should take into account positive international experience in this area

Keywords: concept of preventing corruption offences; preventive measures; preventive state policy; transparency of governance; e-governance

Introduction

Analysing the international experience of combating corruption, it becomes obvious that corruption has no national borders, and it is extremely difficult to overcome it without a systemic approach. Countries with various levels of economic development, international and local organisations,

law enforcement, military and legislative bodies are trying to fight it. However, no country in the world has completely overcome corruption. Although Ukraine has an operating mechanism for preventing and combating corruption, studying international recommendations and borrowing foreign

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experience is an extremely vital and promising direction. However, foreign experience cannot simply be copied. It should serve as an impetus for finding new, effective mechanisms for preventing corruption. There is an option of borrowing basic principles, measures, and mechanisms for combating and preventing corruption, adapting these principles and mechanisms to social conditions, the level of economic development and the system of government of Ukraine.

Many national and international scholars have dealt with the issue of corruption offences and improving Ukrainian legislation, whose works, in the author's opinion, are extremely relevant. The conceptual model, proposed by V. Topchii *et al.* (2021), empirically analyses the effect of corruption phenomena on the dynamics of social cooperation and the functionality of coercive mechanisms. The modelling results demonstrate an inverse correlation between the exclusive dependence of the system on the efficiency of centralised institutions and the level of effectiveness of the production of public goods. Accordingly, the authors point out the critical role of civic engagement (public participation) in anti-corruption prevention processes as a fundamental prerequisite for ensuring and protecting public interests.

O.O. Sydorenko *et al.* (2021) note that corruption is a special type of abuse of law, manifested in the deliberate use of official position and power by officials for the purpose of obtaining personal benefit, while ignoring moral principles and public interests. The authors rightly point out that the development of anti-corruption activities requires deepening doctrinal knowledge about corruption, studying its roots and prevention mechanisms, as this is the foundation for creating a system of practical measures, the sole purpose of which is to significantly reduce the level of corrupt acts.

L. Hbur (2020) adds that effective anti-corruption activities require a solid scientific concept of its prevention. The author concludes that in order to achieve a qualitative leap in anti-corruption activities, it is necessary to implement the following priority measures: improve current legislation, ensuring its scientific validity; implement the best global practices in combating corruption; ensure the mass involvement of citizens and state institutions in anti-corruption programmes; improve the quality of preventive work. This is especially critical for Ukraine, since corruption directly threatens democracy, the rule of law, social development and national security (Buga, 2023).

S. Shatrava and K. Chyshko (2023) rightly believe that minimising the level of corruption in a state depends on the specific tactics and unique tools used by its government. World experience has proven that the harm from corruption is too deep to be quickly neutralised. This emphasises the advantage of preventive measures in the early stages of corruption over combating it in already formed state structures. Meanwhile, the acute need for an operational response requires quick decisions, which is why borrowing and adapting successful foreign experience in combating corruption becomes an obligatory element of the anti-corruption strategy.

Analysing the psychological aspects of corruption in public administration, O. Dragan *et al.* (2020) rightly note that the key psychological factors that push civil servants to corruption are the desire to get rich quickly, low self-esteem, psychological dependence, perceived image in society, and a sense of impunity. In the authors' opinion, it is the feeling of impunity that is the main motivating factor for corrupt actions by public officials.

I. Diorditsa *et al.* (2025) aptly highlight that corruption is a systemic threat to ensuring sustainable development and institutional stability of democratic structures, acquiring particular urgency in the context of Ukrainian state-building. Scientists believe that the problem of conducting anti-corruption expertise in the field of public administration is critically important, since corruption manifestations devalue public trust in state institutions, causing a destructive impact on macroeconomic dynamics, social cohesion and the international reputation of the state.

In spite of a significant amount of empirical and theoretical scientific research in the field of combating corruption, the existing scientific base is characterised by the lack of integrative research. This methodological deficit significantly reduces the practical value of the developed conceptual principles in the formation of an effective anti-corruption system of administrative and legal operationalisation of manifestations of corruption offences in the activities of public servants. The process of restructuring the current anti-corruption legislation should be focused on a constellation of organisational, functional and legal measures.

The purpose of this scientific article was to conduct a general analysis of the existing international experience in preventing corruption offences and justify the mechanisms for its implementation in the current domestic legislation. It is assumed that the results of scientific research will serve as an anti-corruption guide and toolkit towards the systematic minimisation of corruption offences in Ukraine.

Materials and methods

Within the framework of the study, an analysis was carried out of documents developed by national and international institutions that play a key role in the formation and optimisation of anti-corruption policy. In particular, reports and recommendation materials of the Transparency International organisation were analysed. These sources contain an in-depth expert analysis of the identified corruption risks and serve as the basis for the development of specific implementation measures aimed at minimising (or eliminating) the specified threats.

The formal-legal method was used to systematise and doctrinal interpret international anti-corruption conventions. In parallel, the comparative-legal method provided a comparison of national legal mechanisms with the best international practices, which allowed identifying harmonisation gaps and the potential for borrowing effective tools. A systematic approach was necessary to analyse the functional relationships between international obligations and the institutional structure (NACP, NABU, SAP), assessing the interaction as elements of a single anti-corruption system.

The verification of theoretical hypotheses was carried out through empirical methods. Statistical analysis would be used to quantitatively measure the impact of implemented international mechanisms (for example, correlation with the Corruption Perceptions Index (CPI) and indicators of judicial efficiency). Content analysis of reports of international monitoring missions (GRECO, OECD) allowed obtaining an expert qualitative assessment of progress and identifying critical shortcomings.

The use of forecasting and scenario modelling methods contributed to the identification of promising directions for the development of anti-corruption architecture, the

formulation of scientifically based recommendations for optimising national policy, maximising the synergistic effect of using international legal tools. Such a comprehensive methodological approach ensured the reliability, validity and practical significance of the results obtained.

Results and discussion

Analysis of international experience shows that corruption offences are a serious threat to democracy and security of states around the world, negatively affecting all spheres of public life. In the presence of large-scale corruption, there is a belief that the main attention should be focused on eliminating its root causes, and not only on combating individual manifestations.

A detailed analysis of the works of administrative scientists O. Vasilenko (2023), V. Sereda and Z. Kisil (2024), A. Gryshchuk (2025) allows drawing the following conclusions:

1) the legal systems of most foreign countries do not use the term “fight” against corruption. Instead, legislators focus on the principles of preventing offences characteristic of specific areas of activity;

2) among the key factors for the successful development and implementation of effective mechanisms for preventing corruption is well-established interstate interaction and cooperation of law enforcement agencies at both the regional and international levels;

3) a number of international organisations, including the UN, Interpol, the Council of Europe, the World Bank and the International Monetary Fund, play an active role in preventing corruption.

Meanwhile, the critical importance of the problem of corruption is empirically confirmed by analytical data from the World Bank, which indicate that during periods of significant institutional reforms and constitutional changes, the risks of illegal and corrupt activities objectively increase. In addition, the constant fixation in the media of facts of conflicts of interest and the use of public positions for obtaining illegal benefits is gaining such a scale that it is transforming into a serious social problem. This factor is decisive for the formation of a stable negative perception by society of the activities of government officials, which are often viewed as aimed exclusively at personal or group gain.

Based on the 2024 Eurobarometer data, the following EU countries can be identified, the leaders of which face a high level of perception of corruption among the population. Thus, the highest level of perception of corruption among EU leaders is: Greece (98%), Portugal (96%), Malta (95%), Slovenia (95%), Croatia (95%); and the lowest level of perception of corruption among EU leaders is: Finland (18%), Denmark (26%), Luxembourg (43%) (Citizens' attitudes towards..., 2024). Most Europeans believe that corruption is widespread in many areas of public service provision. Although the figures may vary slightly in different Eurobarometer surveys (Flash Eurobarometer for business and Special Eurobarometer for citizens), general trends indicate that corruption is perceived as most widespread in the following areas: national and local/regional public institutions; politicians and political parties; public procurement; the health care system; business licensing; police and customs; courts and tax authorities.

These data highlight the deep concern of Europeans about corruption and point to critical areas that require increased attention and reform. Europeans generally believe

that corruption is widespread in all areas of public administration and service delivery, especially where citizens/businesses interact with officials and there is an opportunity for personal gain or circumvention of rules. Many Europeans are often convinced that “connections” or “acquaintances” are the easiest way to obtain certain public services.

In conformity with Transparency International (2023), the countries with the most effective measures to prevent corruption, which have developed and implemented effective anti-corruption mechanisms, are among the top ten in the world ranking. These countries (in ascending order of ranking) include: Denmark – 90 points; Finland – 87 points; New Zealand – 85 points; Norway – 84 points; Singapore – 83 points; Sweden – 82 points; Switzerland – 82 points; Netherlands – 79 points; Germany – 78 points; Luxembourg – 78 points. These countries traditionally occupy high positions due to transparency, strong democratic institutions, effective rule of law and low level of perception of corruption.

Pursuant to the latest report by Transparency International, in 2024 Ukraine received 35 points out of 100 in the Corruption Perceptions Index (CPI), and took 105th place among 180 countries x. This means that in 2024 Ukraine lost 1 point compared to 2023, when it had 36 points and took 104th place in the Corruption Perceptions Index (2025). Thus, despite some positive shifts in anti-corruption efforts, the overall assessment of corruption perception in the country in 2024 slightly worsened. The European Commission (2024) noted Ukraine's progress in preventing and combating corruption. In particular, it noted the strengthening of the anti-corruption institutional framework and the increased independence of the NABU, SAP and NACP.

In line with the Open Budget Survey published in May 2024, Ukraine has achieved significant success in budget transparency, scoring 67 points out of 100 possible. This result was the best indicator for Ukraine in the entire history of participation in the survey, and significantly exceeds the world average. Ukraine ranked 12th in the world in terms of budget transparency (International Budget Partnership, 2023). Key OBS 2023 indicators for Ukraine:

- Transparency Index: 67 points. This high score indicates that Ukraine provides a large amount of comprehensive and timely budget information;

- Public Participation Index: 24 points. Although this indicator has improved, it still remains relatively low, indicating limited potential for the public to actively participate in the budget process;

- Budget Oversight Index: 76 points. This high indicator indicates a strong role of the legislative body (parliament) and the supreme audit institution (Accounting Chamber) in controlling budget execution.

A study of international experience in preventing corruption allows distinguishing two main models of anti-corruption activities. The vertical strategy for combating corruption (also known as the Singapore or Asian model) is aimed at quickly achieving results. It is used in countries such as Singapore, Japan, the People's Republic of China and South Korea. The goal of this strategy is not to completely eradicate corruption, but to achieve a certain level of its acceptability for the authorities and society. The horizontal strategy (Swedish or Scandinavian model) focuses on gradual, long-term anti-corruption activities based on anti-corruption incentives. Examples of such countries include Sweden, Denmark, Finland, and the Netherlands.

Since corruption exists in all countries of the world, its prevention is a universal problem. Different states are trying to solve it using various models. Thus, studying this experience allows concluding that Ukraine can borrow and apply certain anti-corruption measures that: 1) have not been used in Ukraine before; 2) have already been used, but require formal or substantive updating, or use according to an updated methodology.

It is advisable to start the systematisation of international experience in preventing corruption with an effective model introduced in Singapore. The country scored 84 points out of 100 possible in the Corruption Perceptions Index (2024). It ranks 3rd among 180 countries in the world, behind only Finland (88 points) and Denmark (90 points), which occupy 2nd and 1st places, respectively. The accelerated social, political and economic development of Singapore, which has taken on the character of a steady geometric progression over a relatively short period of 35-40 years, is the result of a purposeful and multi-component anti-corruption policy. The essence of such rapid progress lies in the systematic application of legal, institutional and cultural factors. Singapore's Prime Minister Lee Kuan Yew rightly noted that at the stage of state formation, the first government was faced with the ineffectiveness of existing anti-corruption legislation, which did not cover a significant part of corruption offences, and law enforcement agencies were deprived of sufficient powers. The situation was aggravated by the large-scale involvement of senior officials in corrupt activities.

The response to these challenges was the formation of a comprehensive and rigid legal framework, the key elements of which were: The principle of the "presumption of corruption"; institutional independence; the severity of sanctions and impartial application. Singapore's success is not limited to legal mechanisms, but is integrated into socio-economic and cultural policies: minimising economic incentives for corruption; creating a culture of integrity and meritocracy; and the role of the media as a tool of control. A key finding is that Singapore's rapid progress has been made possible by a strong political will that has provided a synergy between strong legal sanctions, economic incentives for honesty, and cultural condemnation of corruption.

In consonance with the Corruption Perceptions Index (2024), South Korea scored 64 out of 100 on the Corruption Perceptions Index (CPI), ranking 30th out of 180 countries worldwide. The success of the Republic of Korea's anti-corruption program is based on a three-pronged institutional approach, the effectiveness of which is confirmed by scientific analysis, especially regarding the impact of key legislative initiatives. The effectiveness of the Korean model largely depends on a centralised and integrated anti-corruption body – the Anti-Corruption and Civil Rights Commission (ACRC), which functions as a strategic architect, combining preventive (integrity assessment), investigative (complaint handling) and protective (whistleblower protection) functions. Such a holistic consolidation of powers minimises fragmentation of efforts, accelerates response to corruption risks and ensures systemic implementation of anti-corruption policies.

The most significant manifestation of political will was the adoption of the Improper Solicitation and Graft Act (2016). Numerous empirical studies and legal reviews confirm its transformative impact, especially on petty corruption and informal corruption-generating practices:

expanding jurisdiction and changing the legal standard. The Kim Yong-ran Act has set an unprecedented legal precedent, providing for a broader scope of anti-corruption regulations; transformation of corporate and societal culture; systematic preventive measures (Integrity Assessment) and meritocracy. Thus, South Korea's success in combating corruption is determined by a systemic, multidimensional approach. It is guided by a strong central authority (ACRC) that combines proactive preventive measures, strong legislation and accountability mechanisms. All of this is supported by political will and active public participation.

It can be argued that corruption is the least visible in the Scandinavian countries, which traditionally occupy leading positions in world rankings with the lowest level of corruption. According to Transparency International (2024a), Finland scored 88 points out of 100 possible in the Corruption Perceptions Index (CPI), ranking 2nd among 180 countries in the world. In Finland, administrative and legal regulation of the prevention of corruption offences is based on the principles of prevention and deterrence of offences. These principles are enshrined in regulatory and legal acts that relate to specific areas of activity, rather than individual types of offences. It is noteworthy that Finland does not have a single anti-corruption strategy, a separate anti-corruption law or separate anti-corruption structural units.

Instead, the means of prevention are mostly criminal in nature. In particular, the Penal Code of Finland (1963) provides that the commission of corruption and corruption-related offences entails, depending on the degree of public danger, the imposition of a fine or imprisonment for a term of up to four years. The success of Finland, which is consistently positioned as one of the most uncorrupt jurisdictions in the world, is based on the paradigm of integrated integrity, where the prevention of corruption is consciously viewed not as a separate problem requiring specialised laws or centralised bodies, but as an integral part of high-quality and effective public administration (Good Governance). This model is functionally based on the absolute rule of law, which guarantees the political, financial and personnel autonomy of the justice system, thus ensuring impartiality of law enforcement and predictability of administrative decisions. Corruption is classified as part of general criminal offences (regulated by general rules on bribery) and as a lack of management (maladministration), which emphasises a systemic approach to regulation rather than focusing on individual incidents.

The normative foundation for ensuring high ethical standards in the state apparatus is constitutional law and Law of Finland No. 750 "Civil Services Act" (1994), supplemented by internal ethical codes. The effectiveness of this model largely depends on the high quality of public administration, which is characterised by compactness, low bureaucratisation and the absence of caste or clan affiliation, which reduces the possibilities for abuse of discretionary powers. This institutional stability is strengthened by a decent level of wages and a reliable social package for civil servants, which reduces the economic motivation for corruption, as well as by an adequate system of internal and external control over the activities. A critically important element is high public intolerance to corruption and the functioning of developed civil society institutions and independent media, which ensure broad public monitoring and transparency of the decision-making process by officials, which is reinforced

by a state guarantee of protection for persons who have assisted competent authorities in the fight against corruption. Thus, the Finnish model demonstrates that the most effective safeguard against corruption is the high quality of public administration itself, based on trust, ethical stability and transparency.

Unlike Finland, as noted by N. Yuzikova (2021), where the success of the anti-corruption program is the result of the organic integration of the principles of integrity into the quality of public administration and high trust in the rule of law system, the Ukrainian strategy, despite its saturation with institutions and regulatory acts, demonstrates a low correlation between the volume of resources and the final result. Another example of successful Scandinavian experience in preventing corruption is Sweden. In accordance with Transparency International (2024b), Sweden scored 80 out of 100 on the Corruption Perceptions Index, ranking 8th out of 180 countries. The success of the Swedish institutional model in preventing corruption is the result of the convergence of high social capital and strong institutional mechanisms that create a sustainable environment for integrity and transparency.

A critical driver is the high level of social capital and trust that permeates Swedish society, forming a strong cultural deterrent where corruption is socially unacceptable and rare. This cultural foundation is complemented by a strong rule of law and an independent judiciary that ensures impartial application of the law and effective prosecution of corrupt acts. This institutional foundation is confirmed by positive assessments by Transparency International, indicating a low level of perception of corruption and a high quality of justice. The cornerstone of Swedish administrative culture is the Publicity Principle (*Offentlighetsprincipen*), which guarantees broad access to official documents and information by citizens and the media. This principle, enshrined in the Constitution of Sweden (1974), ensures effective public control and is a powerful preventive measure against abuse.

The effectiveness of the system is enhanced by professional and high-quality public administration, characterised by clear processes and a focus on providing quality services, which reduces the space for subjective decisions and corruption rents. Although anti-corruption work is decentralised and integrated into the activities of various state institutions, effective coordination and exchange of experience among these institutions ensure the integrity of the approach. Civil servants are guided by clear ethical norms and values, based on constitutional principles (democracy, legality, objectivity, respect for human rights), creating a culture of integrity. The legislative basis for prosecution is the strict legislation on bribery contained in the Criminal Code of Sweden (1962).

Another illustrative example in the fight against corruption is the Netherlands. Pursuant to Transparency International (2023a), the Netherlands scored 78 out of 100 on the Corruption Perceptions Index, ranking 9th out of 180 countries. The Netherlands' approach to preventing corruption and corruption-related offences is based on a comprehensive administrative and legal approach that combines transparency, innovative risk monitoring and strict sanctions, integrated into the overall architecture of state security. The key principle of the system is transparency and constant reporting, which is reflected in the annual reporting of the Minister of the Interior to Parliament on the detected corruption facts and the measures taken to bring the perpetrators to

justice. This mechanism ensures political accountability and the availability of information to the public, since all materials related to corruption offences are publicly available, except for those that pose a threat to national security (OECD anti-corruption..., 2024). On this basis, public control is built, where the media play a significant role, actively publicising cases of bribery and conducting the own independent investigations.

For the purpose of effective prevention, innovative systems for monitoring "risk zones" in state and public organisations have been introduced. This involves constant monitoring of potential sources of corruption and strict control over the activities of persons who interact with such sources. The process of selecting personnel for the state apparatus integrates the criterion of "corruption security", taking into account the potential "corruption risk" of personnel. In addition, the legal status of state officials is being fully formalised, which ensures a clear consolidation of the legal personality for improper compliance with the established rules of professional ethics (GAN integrity..., 2022). These preventive and control measures are complemented by specific and severe penalties that have a discrediting effect: a complete ban on further work in state organisations and institutions, loss of all social benefits and guarantees (including pensions), fines and temporary suspension from official duties (Global compliance..., 2026). The publicity of bringing civil servants to legal responsibility for corruption offences serves as the apotheosis (final phase) for demonstrating the state's intolerance. Institutionally, the Netherlands has created a specialised service for the prevention of corruption, which functions as a component of the general architecture of state security, ensuring the coordinated implementation of these tasks.

Belgium has a positive track record in preventing corruption. In conformity with Transparency International (2024c), Belgium scored 73 out of 100 on the Corruption Perceptions Index, ranking 16th out of 180 countries. In addition to legal measures under the Criminal and Tax Codes, civil servants are subject to active preventive measures. The COPERNIC reform in Belgium, initiated in the early 2000s, is an example of the introduction of New Public Management (NPM) principles into a traditional administrative system and has achieved success through a synergy of legislative changes and political will. The success of the reform is based on a comprehensive package of regulations that have ensured the transition from a Weberian model focused on process and status to a model focused on the citizen, results, and efficiency. The regulatory support for the reform was implemented through a series of Royal Decrees that legislated a new organisational architecture: the replacement of the classic Ministries with the more flexible and homogeneous Federal Public Services (FPS) and Support Services (PPS), which provided a new organisational structure and contributed to the disappearance of ministerial cabinets in the previous form, separating political responsibility from operational management. A crucial regulatory element that contributed to the success of the human resources management (HRM) reform was the introduction of a mandate system (fixed term) for senior civil servants; this was enshrined in Royal Decrees that allowed for the recruitment of top managers based on competencies and linking the activities to management plans and performance evaluation, which formally contributed to the depoliticisation of senior administrative positions. Regulation played a crucial role in legitimising these changes,

shifting the focus from traditional tenure to accountability and citizen orientation as a central principle. Thus, the success of COPERNIC was due not only to the declaration of new approaches and a change in the management culture, but also to strict regulatory support, which institutionalised NPM principles and forced the administration to be efficient, professional and improve services for the population.

The anti-corruption policy of the Slovak Republic is characterised by a productive mechanism of preventive measures, which is based on three interdependent determinants: a comprehensive legal framework, a specialised institutional architecture and procedural transparency. At the level of a comprehensive legal and strategic framework, the country has ensured the presence of specialised legislation on the fight against corruption, supplemented by targeted strategies and concepts, as well as the Law on Lobbying, which contributes to the regulation of the influence of the private sector on state decisions. The institutional determinant is highly specialised: it includes the National Criminal Agency (NAKA) and the Special Prosecutor's Office, which ensure independent investigation and prosecution of corruption crimes. This vertical is reinforced by the Supreme Audit Office, which carries out external financial control, and the Committee for Incompatibility of Functions, which monitors conflicts of interest. The National Anti-Corruption Council, an advisory body that brings together key stakeholders from the public, private and public sectors, plays a coordinating role. At the level of procedural and preventive measures, Slovakia has emphasised transparency and accountability: strict rules on asset declaration and conflict of interest have been introduced, transparency of public procurement and access to information have been ensured. Whistleblower Protection is of crucial importance, which encourages citizens and officials to report facts of corruption. The system is being modernised through e-governance and digitalisation, which reduce bureaucratic risks. These measures are complemented by internal anti-corruption programmes, codes of ethics and educational programmes aimed at raising awareness and creating a culture of integrity in the public sector.

Israel is a leading country in the effectiveness of preventing corruption in public and political life. According to Transparency International (2025), Israel scored 64 out of 100 on the Corruption Perceptions Index, ranking 30th out of 180 countries. The mechanism for preventing corruption offences in the State of Israel is multi-vector and is based on a systemic combination of legal certainty, institutional independence and a high degree of public accountability. Thanks to this architecture, the country consistently maintains a moderately high level of institutional integrity, which is reflected in international indices (Thematic compilation..., n.d.).

The prevention system is formed around a holistic strategy, where a reliable legislative framework creates a comprehensive legal framework that covers not only the criminalisation of corruption offences (such as bribery and abuse of power), but also a wide range of preventive financial mechanisms. These mechanisms include provisions ensuring transparency of the origin of funds and creating a toolkit for tracing and confiscating illegally obtained assets. Specific legislative acts establish clear rules of ethical conduct and regulation of the receipt of gifts in the public sector, which minimises gaps in legal certainty and eliminates ambiguity in official relations (Israel, n.d.). The functionality of the system is supported by a decentralised but effectively

coordinated network of specialised institutions. Law enforcement is the responsibility of the national police (including specialised elite units) and the State Prosecutor's Office, which guarantee independent investigation and prosecution of top corruption. These structures are supervised by an independent institution of state control and the Ombudsman, which carries out external audits of financial activities and management efficiency, while having a high degree of public influence. Additionally, the Civil Service Commission ensures meritocratic selection of personnel and controls compliance with codes of ethics and conflict of interest rules (*Lex mundi...*, 2022). The effectiveness of the system is enhanced by procedural robustness, which includes strict internal conflict of interest rules, transparency, and access to information mechanisms, and internal audit. A critical element is the legislative protection of whistleblowers, which stimulates internal accountability. Finally, international cooperation is an integral vector of the Israeli strategy, as confirmed by the ratification of key international anti-corruption conventions and active interaction with international supervisory bodies, ensuring the updating of national legislation in accordance with global standards for combating corruption and money laundering.

The experience of the Republic of Poland in implementing anti-corruption policies is sound. According to Transparency International (2023b), Poland scored 53 out of 100 on the Corruption Perceptions Index, ranking 53rd out of 180 countries. The Anti-Corruption Strategy implemented in Poland outlines the implementation of the following goals: continuous improvement of existing anti-corruption legislation; implementation of an innovative algorithm for preventing corruption in all areas; productive detection of corruption offences; increasing the level of legal awareness of citizens; consolidation and expansion of cooperation between law enforcement agencies.

As of 2021, as indicated by O. Melnyk (2021), a decentralised type of organisation of anti-corruption institutions operates in the Republic of Poland. This model, unlike the centralised one, provides for the distribution of power in the field of preventing and combating corruption between law enforcement agencies and state bodies. Key powers in this area are distributed between the highest institutions of state power: the President, Parliament, and the Government. One or more state bodies that directly carry out law enforcement activities are also integrated into this system. As an example of implementation, the Department of Public Administration operates under the President, which, in cooperation with the Ministry of Internal Affairs, works on the prevention and combating of corrupt acts. The fight against corruption in Poland is multi-level and is ensured by the activities of a complex of key institutions: Centralne Biuro Antykorupcyjne (CBA): It is a specialised anti-corruption body that plays a special role, combining operational and investigative functions with active preventive work (organisation of trainings, raising awareness); Agencja Bezpieczeństwa Wewnętrznego (ABW): Provides a security aspect, which may include investigating corruption cases that affect national security; Prokuratura Krajowa: Responsible for criminal prosecution and ensuring that persons guilty of corruption offences are brought to justice; Najwyższa Izba Kontroli (NIK): Performs the function of external supervision (audit) of the use of public funds and the efficiency of public administration, which contributes to the identification of corruption risks.

In addition to state structures, public control mechanisms are actively involved in Poland. In particular, the Monitoring Committee, which includes representatives of non-governmental institutions and organisations (such as Transparency International Poland, which also makes an important contribution), is functioning productively. The Committee's functions are broad, covering public control over the implementation of anti-corruption policy, identifying and documenting corruption offences among government officials, developing proposals for legislation, and conducting educational and preventive measures.

Significant attention in the national strategy is paid to preventive work, which includes: improving mechanisms for monitoring corruption risks and legal regulation; increasing the level of transparency and openness of public administration; developing a culture of integrity; creating an effective internal control system in state bodies; constant cooperation and coordination between all actors. The Polish decentralised model is an example where success in the fight against corruption is ensured by institutional complexity and a balance of powers between the law enforcement, supervisory, political, and public sectors.

The Polish experience highlights that a strong institutional and legislative framework is a necessary but not sufficient condition for effective action against corruption. The critical determinants for success are a constant and consistent political will that provides political support for anti-corruption bodies, and effective control over the full implementation of anti-corruption measures and recommendations. The historical problems that Poland has faced show that without this consistent political will and full implementation of recommendations, progress can slow down significantly. Thus, for Ukraine, the Polish experience is a valuable lesson on the importance not only of creating structures, but also of ensuring the real independence and political support for achieving sustainable results.

As another example, it is worth considering Germany. In line with Transparency International (2024), Germany scored 75 out of 100 points and ranked 15th among 180 countries. Germany has a strong legal and institutional framework for effectively combating corruption. Although the country lacks a single, centralised anti-corruption bureau like the Polish CBA, the fight against corruption is ensured through a wide range of state bodies, laws, and initiatives.

German anti-corruption policy is based on a comprehensive legal and institutional architecture that demonstrates a clearly expressed preventive nature. The legal basis is a wide range of legislative provisions that are not limited to a single anti-corruption act, but integrate the criminalisation of corruption offences into the general Criminal Code of Germany (2024). This integration covers not only the receipt and granting of advantages in the public sector, but also extends to bribery in commercial activities and the health sector, ensuring cross-sectoral legal certainty. The preventive vector is strengthened by specialised acts regulating the protection of whistleblowers and the German Corporate Governance Code, which sets integrity standards for the private sector. In addition, Germany confirms its commitment to international cooperation by ratifying key global agreements such as the United Nations Convention against Corruption (2003) and the OECD Convention on Combating Bribery of Foreign Public Officials (1997).

The fight against corruption at all levels is carried out by key state institutions, including the prosecutor's office and the police at the law enforcement level, as well as the Federal Ministry of the Interior and the Federal Criminal Police Office. In addition, there are anti-corruption commissioners who function as internal controllers, strengthening accountability. The presence of these institutions is reinforced by the active role of civil society organisations. The preventive nature of the policy is dominant and focuses on minimising the abuse of public office by civil servants through legislative, personnel, administrative and organisational measures. This approach is ensured by the fundamental duty of a German civil servant: to perform the official duties objectively and fairly, solely for the benefit of society as a whole. Current legislation provides for the personal responsibility of civil servants for the legality of the actions and the obligation to provide information about the facts of wrongdoing known to such civil servants, which turns every state body into a proactive element of internal integrity control.

The main priorities of anti-corruption activities in Germany, according to Z. Kisil and O. Tarasenko (2022), are: extremely strict restrictions on receiving gifts and continuing employment after the dismissal from civil service; the formation of a register of corrupt private institutions or organisations in order to prevent contacts with state authorities; the creation of a register of positions that are most prone to corruption offences; permanent change of personnel of civil servants in these positions. Thus, the German approach to preventing corruption is based on such principles as the rule of law, transparency, accountability and active participation of both state and non-state actors. It is systemic, but decentralised, which contributes to the adaptation of measures to the specific requests of different levels of government.

Anti-corruption policy in the United Kingdom also focuses on significant public activity in the context of preventing corruption and corruption-related offences. As O. Vasilyeva and N. Vasilyev (2019) point out, one of the principles is the public's own awareness, which closely monitors negative phenomena in the state. Pursuant to Transparency International (2024e), the United Kingdom scored 71 points on the Corruption Perceptions Index (CPI), ranking 20th out of 180 countries. Anti-corruption policy in the United Kingdom is based on a comprehensive approach, encompassing legislation, law enforcement activities and government initiatives.

The system for preventing corruption in the United Kingdom has traditionally been characterised by high standards of integrity in the civil service, although in the last few years, it has been described as a "patchwork quilt" of institutional roles and approaches, which is under pressure from the decentralisation of public services. A critical element of the legal framework is the Bribery Act (2010). This piece of legislation is considered one of the strictest in the world, as it: criminalises active and passive bribery, as well as bribery of foreign public officials; establishes corporate liability for failure to prevent bribery (Failure to Prevent Bribery), which forces companies to implement "adequate procedures" to reduce risks; has broad extraterritorial effect, allowing for the prosecution of crimes committed by British citizens or companies abroad.

The experience of the United Kingdom, despite differences in legal systems and institutional architecture, contains a number of valuable mechanisms and approaches that can be implemented or adapted in Ukraine to increase the

effectiveness of anti-corruption policy, namely: strengthening corporate responsibility and compliance; combating illicit finance and money laundering; raising standards of public ethics and lobbying; strategic and professional development. The greatest value for Ukraine is represented by preventive mechanisms that strengthen corporate integrity and enhance the transparency of financial flows, which is critical for integration into the global economic space.

Denmark is known for its low level of corruption and a high level of trust in state institutions. This success is achieved not only by the presence of a single “anti-corruption body”, but also by a comprehensive architecture of institutions and practices that promote transparency, accountability, and integrity. Denmark is traditionally considered a global benchmark in the fight against corruption, regularly ranking high in international rankings, in particular according to Transparency International (2024f), Denmark scored 90 points on the CPI, ranking first among 180 countries and being recognised as the least corrupt country in the world. Importantly, Denmark does not have a single centralised anti-corruption agency, as in some other countries. Instead, the fight against corruption is integrated into the activities of various state institutions, which ensures the division of responsibility and mutual control.

The basis of the Danish model is a mature civil society and a deeply rooted culture of “zero tolerance” for corruption. This intolerance extends not only to public officials, but also to the private sector. Most companies adhere to a policy of “zero tolerance” for bribery, often requiring employees to sign special agreements to refuse corrupt practices, the violation of which leads to dismissal.

A crucial element is also a high level of transparency and openness of governance. Information on the movement of public funds is as transparent as possible, which makes it difficult for officials to hide income and expenses. Although Denmark does not have a single national anti-corruption strategy, it has a well-developed and strict legal framework, which includes specialised acts, for example, amending No. 380 to the Criminal Code of Denmark (2002). Danish legislation is extremely strict: even minor benefits or privileges (such as paying bills or gifts) can be regarded as corruption.

The system actively supports public and parliamentary control. Any citizen has the right (including anonymously) to apply to law enforcement agencies with a statement to check a violation. In addition to public control, there is parliamentary control over the activities and income of ministers. Denmark’s success is thus the result of a combination of deep-rooted social values, the historical evolution of the bureaucracy, and clear, robust legislation, while further challenges lie in the areas of political transparency and international economic activity.

In conformity with Transparency International (2024g), the United States scored 65 on the CPI in 2024, ranking 28th out of 180 countries. The United States’ (US) anti-corruption record is characterised by a dualism: one of the most aggressive extraterritorial legal systems, but also systemic internal vulnerabilities that affect institutional integrity. The US position has been trending downward, indicating a growing perception of the domestic risks associated with political and institutional corruption.

The US government has released the United States Strategy on Countering Corruption (2021), which represents a nationwide, consolidated approach to anti-corruption

activities. This strategic document outlines priority areas of effort within five key provisions: 1) modernising, coordinating, and resourcing anti-corruption initiatives; 2) countering illicit finance; 3) ensuring that corrupt officials are held accountable; 4) strengthening the multilateral anti-corruption architecture at the international level; and 5) intensifying diplomatic interaction and optimising the use of foreign assistance to achieve goals. To ensure accountability of the new strategy, a mechanism for annual reporting of federal departments and agencies to the US President on progress is provided.

The US anti-corruption experience demonstrates high effectiveness in the field of criminal prosecution and extra-territorial application of the law (FCPA), which has a positive impact on international business ethics. At the same time, systemic problems related to the interaction of politics and finance (lobbying) remain key domestic challenges. The adoption of the United States Strategy on Countering Corruption (2021) indicates awareness of these challenges and the intention to transfer anti-corruption efforts to a new, institutionally coordinated level. Thus, the study and implementation of elements of this strategic experience is of significant importance for the formation of a comprehensive approach to solving the problems of combating corruption in other national practices, in particular in Ukraine.

Canada’s anti-corruption policy represents a comprehensive and multi-vector model that ensures a high level of institutional integrity and stable positions in global rankings, in particular, according to Transparency International (2024h), Canada scored 75 points on the Corruption Perceptions Index. This means that Canada ranked 15th among 180 countries and territories covered by the study. The legal and institutional framework for Canada’s anti-corruption system is structured at two key levels. Domestic corruption is criminalised through the Criminal Code of Canada (1985), which contains clear definitions and sanctions for bribery (both active and passive), abuse of office, conflict of interest and influence peddling. Internationally, Canada actively enforces the Corruption of Foreign Public Officials Act (1998), which is an analogue of the US FCPA. The CFPOA provides extraterritorial jurisdiction to prosecute Canadian entities for bribing foreign public officials to obtain commercial advantages, and establishes requirements for proper accounting to prevent the concealment of improper payments.

Overall, the Canadian anti-corruption system is based on the principles of the rule of law, accountability and transparency, with multiple layers of oversight to ensure the integrity of public administration. Adapting elements of Canada’s anti-corruption experience to Ukrainian realities can provide a strengthening of preventive tools and increase the transparency of political processes. Based on the analysis of the Canadian system, which is characterised by a high level of institutional integrity, it is advisable to identify four key areas for implementation: regulation of political influence and transparency of lobbying; strengthening of financial intelligence and asset monitoring; institutional integrity and ethical control; protection of whistleblowers.

Pursuant to Transparency International (2024i), Romania scored 46 points in the CPI, ranking 65th out of 180 countries. Although this score remains unchanged compared to the previous year, it is still significantly lower than the European Union average (62 points). The institutional and legislative mechanisms for preventing corruption in Romania constitute a complex and dynamic complex, largely

shaped by European Union requirements, in particular the Cooperation and Verification Mechanism (CVM). Romania's anti-corruption policy is characterised by a two-pronged approach, encompassing both repressive and preventive instruments, although the effectiveness is characterised by significant instability. The National Anti-Corruption Directorate (DNA) plays a central role in the repressive segment (Law of Romania No. 78/2000, 2000). This specialised prosecutorial body, created to investigate high- and medium-level corruption, has long been a model for Eastern European countries, demonstrating high conviction rates, including the prosecution of high-ranking officials (ministers, deputies, judges). The DNA's success has been closely linked to its operational independence and strong international support. However, its activities have consistently faced political resistance, leading to periodic attempts to legislatively limit its powers and change its leadership, which in turn have caused temporary but significant declines in the overall effectiveness of the fight against corruption.

Pivotal preventive institutions operate in parallel. The National Integrity Agency (ANI) is responsible for verifying the declarations of assets, income and possible conflicts of interest of public officials. The ANI's activities are critical to ensuring transparency of assets and preventing illicit enrichment. The National Anti-Corruption Strategy (NAS) serves as a strategic framework that defines goals and measures to improve institutional integrity in the state apparatus. The NAS is oriented towards a risk-based approach, requiring state institutions to develop internal integrity plans. Thus, the Romanian experience illustrates that effective counteraction to corruption requires not only the creation of strong repressive institutions, but also ensuring the long-term independence, stable political support and the consistent implementation of preventive measures at all levels of public administration to form a sustainable culture of integrity.

In line with data provided by Transparency International (2024j), Estonia scored 76 out of 100 points in the Corruption Perceptions Index, ranking 13th out of 180 countries. This is a very high indicator, indicating a low level of perception of corruption in the public sector. It is important to note that its score has not changed compared to 2023. Estonia is recognised as one of the least corrupt countries in Eastern Europe and demonstrates high performance in international corruption perception indices, which reflects the effectiveness of its institutional and legislative mechanisms. Scientific analysis indicates that Estonia's success is based on three interrelated pillars: extensive digitalisation of public administration (e-government), transparency of decision-making and a simplified but strong institutional framework.

In Estonia, the experience of e-government, which is being formed and developed in Ukraine, is extremely useful for borrowing. The main priority in Estonia was precisely to minimise the "human" factor in relations between citizens,

civil servants, legal entities, etc. in the context of implementing administrative procedures and receiving administrative services. This, ultimately, significantly reduces the degree of corruption offences. In fact, Estonia is the first country in the world where, for example, you can take part in voting in elections via the INTERNET network.

Another critical preventive element is a high degree of transparency in decision-making. The legislative framework requires public access to information on public procurement, political party financing and declarations of interests. Estonia has a Corruption Prevention Act, which clearly defines the concept of conflict of interest and obliges public officials to declare the economic interests. Importantly, the emphasis is on proactive disclosure of information, rather than just responding to requests, which strengthens public scrutiny and reduces information asymmetry. Unlike some other countries, Estonia has not established a single mega-agency to combat corruption.

Instead, responsibilities are divided between several key bodies: the Security Police (KAPO), which investigates high-level corruption crimes; the Prosecutor's Office (with a high level of professionalism and independence); and the State Audit Office, which audits the use of public funds. This decentralised but effectively coordinated approach prevents excessive concentration of power in a single institution and provides a system of checks and balances.

The Estonian model of corruption prevention is a unique example where technological solutions are not just an auxiliary tool, but a fundamental architectural element that creates the "corruption resilience" of the system. This approach, combined with a high level of administrative culture, an independent judiciary and public intolerance of corruption, ensures a consistently low level of corruption risks, focusing more on systemic prevention than on exclusively repressive measures.

An analysis of anti-corruption activities in various countries, including Singapore, South Korea, Finland, Sweden, the Netherlands, Belgium, Slovakia, Israel, Poland, Germany, the United Kingdom, Denmark, the United States, Canada, Romania and Estonia, showed that many of these countries have created specialised organisations and institutions. The task is to develop strategies, tactics, conceptual programmes and documents, as well as implement preventive measures to combat corruption. So, currently, two main conceptual models of combating corruption are distinguished, which demonstrate different levels of effectiveness: the "Specialised Repression" Model (DNA Model/Hong Kong ICAC) and the "Systemic Prevention" Model (Scandinavian and Estonian models). The first model is clearly represented in Hong Kong (ICAC), as well as with modifications in Romania (DNA) and Singapore (CPIB), and is based on the creation of a powerful, independent, centralised body with broad powers to investigate and prosecute corruption crimes, especially at a high level (Table 1).

Table 1. Analytical assessment of the repressive model

| Analytical assessment | Repressive model |
|-----------------------|--|
| Strengths | Quickly restores public trust through high-profile arrests and high conviction rates. Allows for the decapitalisation of corruption networks by eliminating key individuals. |
| Weaknesses | Instability (high dependence on political will and independence of leadership). Expensive to operate. Does not address root causes of corruption (weakness of administrative systems). |
| Conclusion | Effective as short-term "shock therapy", but insufficient for systemic and lasting change. |

Source: developed by the authors

Analysis of international practice allows concluding that the most sustainable and comprehensive success is achieved not by choosing between prevention and repression, but by the optimal integration into the Hybrid Model. Prevention,

characteristic of the Scandinavian countries (Finland, Sweden) and Estonia, focuses on minimising opportunities for corruption through structural reforms, rather than through increased punishment (Table 2).

Table 2. Analytical evaluation of the preventive model

| Analytical assessment | Preventive model |
|-----------------------|---|
| Strengths | Creates a sustainable “corruption resilience” of the system. Eliminates the root causes of corruption (weakness, opacity). Cheaper in the long run. Uses digitalisation to reduce discretion (e.g. e-government in Estonia). |
| Weaknesses | Slow to implement. Requires a high level of administrative culture and public intolerance. Not always effective against already existing, deeply entrenched corruption networks. |
| Conclusion | Optimal for long-term sustainability and the formation of quality public administration. |

Source: developed by the authors

Thus, the anti-corruption strategy should focus on prioritising preventive administrative and technological measures as the basis for resilience, while maintaining strong repressive mechanisms as a tool for deterring and combating high-level corruption. Ukraine can use this international experience to reduce the level of corruption. This will directly affect the well-being of the population, because the level of corruption in the state is a key factor determining it.

Problems of legal regulation of prevention of corruption offences in Ukraine and ways to eliminate such offences. The conducted comparative analysis of anti-corruption systems in leading countries characterised by a high level of socio-economic development (in particular, Singapore, South Korea, Finland, Sweden, the Netherlands, Estonia, the USA, Canada, Germany, Poland, etc.) allows positioning the decisive importance of the comparative-implementation method in the formation of an effective system of combating corruption. The use of this method is critically important for minimising potential defective positions identified in the process of functioning of foreign anti-corruption systems and ensuring maximum effectiveness of national anti-corruption measures.

Given the consolidated practical and proven experience of the above-mentioned foreign countries, a number of modernisation measures are proposed for the domestic public-legal continuum:

1. Financial, economic and organisational measures (models of Sweden, South Korea):

- reforming the financing of civil society institutions: it is advisable to review the existing system of financing anti-corruption public organisations. By analogy with the Swedish model, it is proposed to transfer this financing to the plane of investment interest of private business structures, ensuring the independence and sustainability of civil control;

- institutionalisation of e-government and transparency: it is necessary to systematically introduce an electronic government system. Based on the practical model of South Korea, the key principle should be full transparency of all administrative acts, including the possibility of remote access to the content for private law entities, which will contribute to the reduction of discretionary powers.

2. Criminal procedural and legal measures (Singapore model). Modification of the criminal procedural burden of proof: the feasibility of implementing the model of derogation from the presumption of innocence into the national criminal procedural legislation is substantiated exclusively for cases related to corruption offences. This involves placing the obligation to prove the legality of the origin of assets

or other incriminated facts on the relevant official who is in the status of a suspect or accused, which reflects an approach successfully implemented, in particular, in Singapore and a number of common law jurisdictions.

3. Budgetary and financial and decentralisation measures. Abolition of budget centralism and simplification of fund consolidation: it is proposed to abolish the practice of budget centralism and the complex procedure of consolidation-redistribution of budget funds through a single treasury account. This outdated model should be replaced by full budgetary autonomy of territorial communities (municipalities) in combination with maximum openness and transparency of the municipal budget process, which minimises corruption risks at the stage of redistribution.

The global nature of the corruption epiphenomenon is not only an incentive to strengthen socio-economic and organisational-legal international cooperation, but also determines the actualisation of the process of forming a qualitatively new transnational doctrinal model of legal operationalisation of this phenomenon. The ultimate goal of such a doctrine is to consolidate the global anti-corruption potential. The results of this scientific research can become the basis for further scientific research. The findings will help in resolving debatable issues related to measures to prevent corruption offences. In addition, these results can be used to develop practical recommendations. Such recommendations will contribute to the creation and implementation of a new anti-corruption policy that will take into account successful international experience.

Conclusions

The subject of this study was the analysis of international legal mechanisms for preventing corruption offences and the assessment of the possibilities of the adaptation and integration into the anti-corruption architecture of Ukraine. The purpose of the article was to summarise practically tested foreign experience in preventing corruption and determine its significance for improving domestic administrative and legal regulation. The conducted study allows stating that the goal was achieved, despite the limitations associated with the fragmentation of public statistical information and limited access to individual institutional materials of foreign jurisdictions.

During the study, a systematic analysis of international anti-corruption models was carried out, in particular, the practices of the Scandinavian countries, Singapore, South Korea, the Netherlands, Israel, Germany, and Slovakia. It was found that effective systems for combating corruption

are based on a combination of strict legal regulation, institutional independence, transparency of public administration and active participation of civil society. The analysis of legislation and institutional mechanisms allowed establishing that the preventive approach dominates over the repressive one, and the key tools are e-governance, financial openness, conflict of interest control and whistleblower protection. The results of the study showed that the lack of a single anti-corruption strategy in individual states is not an obstacle to high efficiency, provided that anti-corruption norms are systematically integrated into the general legal field. Such trends indicate the crucial importance of legal culture and institutional integrity. The results of the analysis revealed universal structural elements of successful anti-corruption models, regardless of the legal family of the state. The results obtained allow stating that the implementation of international experience should be carried out, taking into account national institutional and socio-legal characteristics.

Summarising the results obtained, it can be noted that international anti-corruption practices form a holistic concept of corruption prevention as a multi-level administrative

and legal process. Conceptually, the above indicates the need to move from fragmentary changes to a systemic rethinking of anti-corruption policy in Ukraine, where prevention, accountability, and transparency are the basic principles. This deepens the understanding of corruption not only as a crime, but as an institutional dysfunction that requires a comprehensive legal response. Promising areas for further research include an in-depth analysis of the mechanisms of institutional implementation of international standards in the activities of specific public authorities in Ukraine, as well as an assessment of the effectiveness of preventive instruments in the dynamics of law enforcement practice.

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Conflict of interest

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References

- [1] Bribery Act of United Kingdom. (2010, April). Retrieved from <https://www.legislation.gov.uk/ukpga/2010/23>.
- [2] Buga, G.S. (2023). Experience of foreign countries in the fight against corruption prevention. *Legal Position*, 1(38), 149-152. doi: 10.32782/2521-6473.2023-1.29.
- [3] Citizens' attitudes towards corruption in the EU in 2024. (2024). Retrieved from <https://europa.eu/eurobarometer/surveys/detail/3217>.
- [4] Constitution of Sweden. (1974, June). Retrieved from <https://www.riksdagen.se/globalassets/03.-dokument-och-lagar/bestall-och-ladda-ner/other-languages/grundlagar-2023-engelsk-web.pdf>.
- [5] Corruption of Foreign Public Officials Act of Canada. (1998, December). Retrieved from <https://laws-lois.justice.gc.ca/eng/acts/c-45.2/>.
- [6] Corruption Perceptions Index – 2024. (2025). Retrieved from https://commission.europa.eu/news-room/factsheets/special-eurobarometer-546-europeans-attitudes-towards-corruption_en
- [7] Criminal Code of Belgium. (1867, June). Retrieved from https://issuu.com/ethics360/docs/penal_code_belgium.
- [8] Criminal Code of Canada. (1985, July). Retrieved from <https://laws-lois.justice.gc.ca/eng/acts/c-46/>.
- [9] Criminal Code of Denmark. (2002, May). Retrieved from <https://antislaverylaw.ac.uk/wp-content/uploads/2019/08/Denmark-Criminal-Code.pdf>.
- [10] Criminal Code of Germany. (2024, November). Retrieved from <https://surl.li/bdvset>.
- [11] Criminal Code of Sweden. (1962, December). Retrieved from https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/brottsbalk-1962700_sfs-1962-700/.
- [12] Diorditsa, I., Onishchuk, Y., Matviichuk, A., Maliarchuk, N., & Dasiuk, V. (2025). Anti-corruption expertise in Ukrainian public administration: Conceptual framework, challenges, and innovative approaches. *Interdisciplinary Journal on Public Administration Law*, 1, 188-215. doi: 10.13130/2723-9195/2025-1-72.
- [13] Dragan, O.V., Yermakova, G.S., Chvaliuk, A.M., Kurchin, O.G., & Karagodin, O.V. (2020). Psychological aspects of corruption in public administration: Case-study of Ukraine. *Academic Journal of Interdisciplinary Studies*, 9(6), 264-277. doi: 10.36941/ajis-2020-0130.
- [14] European Commission. (2024). *Ukraine report 2024*. Retrieved from https://enlargement.ec.europa.eu/ukraine-report-2024_en?utm.
- [15] GAN integrity – Netherlands country risk report. (2022). <https://www.ganintegrity.com/country-profiles/netherlands/>.
- [16] Global compliance news-anti-corruption in the Netherlands. (2026). Retrieved from <https://www.globalcompliancenews.com/anti-corruption/anti-corruption-in-the-netherlands/>.
- [17] Gryshchuk, A.B. (2025). Selected aspects of corruption prevention in the National Police. *Analytical and Comparative Jurisprudence*, 2, 527-532. doi: 10.24144/2788-6018.2025.02.78.
- [18] Hbur, L. (2020). Ways to overcome corruption and corruption manifestations in Ukraine: Criminal and legal analysis. *Law, Human, Environment*, 11(3), 166-174. doi: 10.31548/law2020.03.020.
- [19] Improper Solicitation and Graft Act of Korea. (2016, May). Retrieved from https://elaw.klri.re.kr/eng_service/lawView.do?hseq=41954&lang=ENG.
- [20] International Budget Partnership (IBP). (2023). *Open budget survey 2023*. Retrieved from <https://internationalbudget.org/wp-content/uploads/IBP-OBS-Global-Report-2023-v4-Final-Artwork.pdf>.
- [21] Israel. (n.d.). Retrieved from <https://anticor.world/en/main/country/Israel>.
- [22] Kasil, Z., & Tarasenko, O. (2022). International experience in preventing corruption as a vector for creating a national anti-corruption strategy in Ukraine. *Social and Legal Studies*, 5(3), 9-15. doi: 10.32518/2617-4162-2022-5-3-9-15.

- [23] Law of Finland No. 750 “Civil Services Act”. (1994, August). Retrieved from <https://www.finlex.fi/fi/lainsaadanto/saadaskaannokset/1994/eng/750?utm>.
- [24] Law of Romania No. 78/2000 “On the Prevention, Detection, and Punishment of Corruption”. (2000, May). Retrieved from <https://legislatie.just.ro/public/detaliidocument/22361>.
- [25] Lex mundi – Israel: Anti-bribery and corruption. (2022). Retrieved from <https://www.lexmundi.com/guides/lex-mundi-global-anti-corruption-compliance-guide/jurisdictions/middle-east/israel/>.
- [26] Melnyk, O.G. (2021). International experience in preventing and combating corruption as a vector of formation of national anti-corruption policy in Ukraine. *Legal Scientific Electronic Journal*, 2, 32-35. doi: 10.32782/2524-0374/2021-2/5.
- [27] OECD anti-corruption and integrity outlook 2024 – country notes: Netherlands. (2024). Retrieved from https://www.oecd.org/en/publications/anti-corruption-and-integrity-outlook-2024-country-notes_684a5510-en/netherlands_06d578cd-en.html.
- [28] OECD Convention on Combating Bribery of Foreign Public Officials in International Business. (1997, November). Retrieved from <https://legalinstruments.oecd.org/public/doc/205/205.en.pdf>.
- [29] Penal Code of Finland. (1963, June). Retrieved from <https://www.warnathgroup.com/wp-content/uploads/2022/03/1995-Penal-Code-Chapter-25-Section-3.pdf>.
- [30] Sereda, V.V., & Kisel, Z.R. Preventing corruption in the actions of the National Police of Ukraine: administrative and legal dimensions. *Analytical and Comparative Jurisprudence*, 5, 616-623. doi: 10.24144/2788-6018.2024.05.95.
- [31] Shatrava, S.O., & Chishko, K.O. (2023). Foreign experience in preventing and combating corruption in Asian countries and prospects for its use in Ukraine. *State and Regions. Series: Law*, 1, 348-353. doi: 10.32782/1813-338X-2023.1.57.
- [32] Sydorenko, O.O., Yavorskyi, V.O., & Kvasylchuk, D.B. (2021). Corruption as a type of abuse of rights: causes and main methods of combating it. *Legal Scientific Electronic Journal*, 4, 65-68. doi: 10.32782/2524-0374/2021-4/14.
- [33] Thematic compilation of relevant information submitted by Israel (Article 6 UNCAC). (n.d.). Retrieved from https://www.unodc.org/documents/corruption/WG-Prevention/Art_6_Preventive_anti-corruption_bodies/Israel.pdf.
- [34] Topchii, V., Zaderenko, S., Didkivska, G., Bodunova, O., & Shevchenko, D. (2021). International anti-corruption standards. *Baltic Journal of Economic Studies*, 7(5), 277-286. doi: 10.30525/2256-0742/2021-7-5-277-286.
- [35] Transparency International. (2023a). *Netherlands*. Retrieved from <https://www.transparency.org/en/countries/netherlands>.
- [36] Transparency International. (2023b). *Poland*. Retrieved from <https://www.transparency.org/en/countries/poland>.
- [37] Transparency International. (2024). *Corruption perceptions index*. Retrieved from <https://www.transparency.org/en/>.
- [38] Transparency International. (2024a). *Finland*. Retrieved from <https://www.transparency.org/en/countries/finland>.
- [39] Transparency International. (2024b). *Sweden*. Retrieved from <https://www.transparency.org/en/countries/sweden>.
- [40] Transparency International. (2024c). *Belgium*. Retrieved from <https://www.transparency.org/en/countries/belgium>.
- [41] Transparency International. (2024d). *Germany*. Retrieved from <https://www.transparency.org/en/countries/germany>.
- [42] Transparency International. (2024e). *United Kingdom*. Retrieved from <https://www.transparency.org/en/countries/united-kingdom>.
- [43] Transparency International. (2024f). *Denmark*. Retrieved from <https://www.transparency.org/en/cpi/2024>.
- [44] Transparency International. (2024g). *United States*. Retrieved from <https://www.transparency.org/en/countries/united-states>.
- [45] Transparency International. (2024h). *Canada*. Retrieved from <https://www.transparency.org/en/countries/canada>.
- [46] Transparency International. (2024i). *Romania*. Retrieved from <https://www.transparency.org/en/cpi/2024>.
- [47] Transparency International. (2024j). *Estonia*. Retrieved from <https://www.transparency.org/en/countries/estonia>.
- [48] Transparency International. (2025). *Israel*. Retrieved from <https://www.transparency.org/en/countries/israel>.
- [49] United Nations Convention Against Corruption. (2003, October). Retrieved from https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf.
- [50] United States Strategy on Countering Corruption. (2021, December). Retrieved from <https://www.whitehouse.gov/wp-content/uploads/2021/12/UnitedStates-Strategy-on-Countering-Corruption.pdf>.
- [51] Vasilenko, O.Y. (2023). *Administrative and legal principles for preventing corruption and corruption-related offences*. (Doctoral dissertation, Uzhgorod National University, Uzhgorod, Ukraine).
- [52] Vasilyeva, O.I., & Vasilyev, N.V. (2019). Foreign experience of anti-corruption activities in public authorities. *Investments: Practice and Experience*, 13, 62-65. doi: 10.32702/2306-6814.2019.13.62.
- [53] Yuzikova, N.S. (2021). *Special restrictions, prohibitions and other preventive measures – an effective arsenal in combating corruption: A comparative study*. In *Latest criminal law research – 2021: Almanac of scientific works* (pp. 78-85). Mykolaiv: MIP NU “OYA”.

Міжнародно-правові механізми запобігання корупції: аналіз ефективності та перспективи використання в розбудові антикорупційної архітектури України

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Анотація. Метою статті був аналіз міжнародного досвіду у боротьбі з корупційними правопорушеннями для подальшої його інтеграції в українське законодавство. У дослідженні використано такі методи, як системний аналіз, компаративно-імплементаційний, статистичний та ретроспективний методи. У статті проведено системний огляд світових концепцій запобігання корупції. Зазначається, що в умовах сучасних глобалізаційних процесів критично важливим є запозичення успішного іноземного досвіду та його впровадження у чинне законодавство України. Також детально проаналізовано низку превентивних заходів, які застосовуються провідними країнами для запобігання корупційним правопорушенням. Особливу увагу приділено позитивному досвіду країн з найнижчим рівнем корупції, висвітлено шляхи досягнення таких результатів. У статті розглянуто антикорупційні стратегії Сінгапуру, Південної Кореї, Фінляндії, Швеції, Нідерландів, Бельгії, Словацької Республіки, Ізраїлю, Республіки Польщі, Німеччини, Великої Британії, Данії, Сполучених Штатах Америки, Канаді, Румунії, Естонії. Підкреслюється, що в державах із низьким рівнем корупції, моделі запобігання поєднують як репресивні заходи, так і комплексне усунення чинників, що сприяють корупції. Зазначається, що сучасна стратегія запобігання корупції вимагає активної співпраці між державними органами, правоохоронними структурами та громадянським суспільством у питаннях превенції та протидії корупційним правопорушенням. Важливою передумовою успіху у запобіганні корупції є також зростання громадянської свідомості. З огляду на європейський вектор розвитку України, існує гостра потреба у розробленні та реалізації сучасної антикорупційної політики. Вона має враховувати позитивний міжнародний досвід у цій сфері

Ключові слова: концепція запобігання корупційним правопорушенням; превентивні заходи; превентивна державна політика; прозорість врядування; електронне урядування