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MECHANISMS OF STATE ANTI-CORRUPTION POLICY FORMATION IN UKRAINE UNDER WAR CONDITIONS

The article examines the mechanisms of state anti-corruption policy formation in Ukraine under conditions of full-scale war. The author analyzes the evolution of anti-corruption institutions and their adaptation to wartime realities. The normative-legal foundations of anti-corruption activities are considered, particularly the Anti-Corruption Strategy for 2021-2025 and the State Anti-Corruption Program for 2023-2025. The role of specialized anti-corruption bodies (NACP, NABU, SAP, HACC, ARMA) in forming and implementing anti-corruption policy under martial law is analyzed. The challenges facing Ukraine's anti-corruption system during the war are studied, including the need to ensure transparency in the use of international aid and defense resources. Proposals for improving coordination mechanisms between anti-corruption bodies and strengthening public control over anti-corruption policy implementation are substantiated. Promising directions for developing Ukraine's anti-corruption system in the context of European integration processes and wartime challenges are identified. The article is based on analysis of normative acts, reports of anti-corruption bodies, and scientific publications on public administration of anti-corruption activities.

Keywords: *anti-corruption policy, public administration, policy formation mechanisms, martial law, anti-corruption bodies, coordination, European integration.*

Problem Statement and Its Connection with Relevant Scientific and Practical Tasks. The formation of effective state anti-corruption policy in Ukraine has gained particular importance under conditions of full-scale war initiated by Russian aggression on February 24, 2022. Wartime conditions create additional challenges for the anti-corruption system, requiring

transparency in the use of significant volumes of international aid and defense resources.

The relevance of the research is determined by the need to adapt existing mechanisms for forming anti-corruption policy to new wartime challenges. As noted in the Anti-Corruption Strategy for 2021-2025, state anti-corruption policy is not always based on complete, objective, and reliable data; efforts of various state authorities are insufficiently coordinated. This issue becomes critically important when Ukraine receives unprecedented volumes of international aid, the effective use of which directly affects the state's ability to resist aggression.

The problem is connected with key tasks of modern public administration: ensuring national security, maintaining trust of international partners, and creating prerequisites for post-conflict recovery. Anti-corruption policy should be a permanent function of the state, with its foundation being the creation of stable nationwide foundations for preventing and combating corruption.

Analysis of Recent Domestic and Foreign Research. The problem of forming and implementing anti-corruption policy in Ukraine is widely represented in scientific research by domestic scholars. Theoretical foundations of anti-corruption policy were developed in the works of S.O. Kravchenko, who studied basic principles and strategic approaches to forming anti-corruption policy [2]. P.I. Haman analyzed problems and prospects of anti-corruption state policy development, emphasizing the need for a systematic approach to eliminating causes of corruption [3].

Research on mechanisms of combating corruption in the context of public administration was conducted by I.S. Bondar and V.H. Hornyk, who examined anti-corruption policy and corruption prevention in public administration [4]. M.I. Melnyk studied the essence of corruption and measures to combat it, forming conceptual foundations of anti-corruption activities [5]. Ye.V. Nevmerzhytskyi analyzed causes, consequences, and mechanisms of combating corruption in Ukrainian realities [6].

Particular importance is given to research dedicated to the functioning of anti-corruption institutions in Ukraine. Anti-corruption bodies created after the Revolution of Dignity – NABU, SAP, NACP, HACC, ARMA – have become real instruments for combating corruption and an important factor in Ukraine's European integration [7]. However, their activities have repeatedly been subject to critical analysis by experts and the public. In foreign research, significant attention is paid to international standards of anti-corruption policy. The UN Convention

against Corruption establishes basic principles for forming national anti-corruption systems [8]. European experience in forming anti-corruption policy is presented in works by researchers from Transparency International and other international organizations.

However, existing research pays insufficient attention to the specifics of forming anti-corruption policy under martial law conditions. Ukraine's anti-corruption policy in the context of war requires separate scientific understanding, as wartime conditions radically change public administration priorities and create new risks of corruption manifestations. The problem of optimizing coordination mechanisms between different anti-corruption bodies under martial law conditions remains unresolved. The issue of adapting strategic planning of anti-corruption activities to wartime realities and ensuring balance between national security needs and transparency of public administration requires research.

Formulation of Article Goals. The purpose of the article is to study mechanisms of state anti-corruption policy formation in Ukraine under war conditions and substantiate directions for their improvement.

Achieving the set goal involves solving the following tasks:

- analyze normative-legal foundations of forming anti-corruption policy in Ukraine and their adaptation to wartime conditions;
- study the role and functions of specialized anti-corruption bodies in forming anti-corruption policy;
- identify features of coordination mechanisms for anti-corruption activities under martial law conditions;
- determine challenges and threats to Ukraine's anti-corruption system during the war period;
- substantiate proposals for improving mechanisms of forming and implementing anti-corruption policy under wartime conditions.

Presentation of Main Research Material with Full Justification of Obtained Scientific Results. The legal basis for forming state anti-corruption policy in Ukraine is constituted by a system of normative acts including international conventions, laws of Ukraine, and subordinate normative acts. The basic document is the Law of Ukraine «On the Foundations of State Anti-Corruption Policy for 2021-2025,» which approved the Anti-Corruption Strategy for 2021-2025 [1]. This document defines five main principles of anti-corruption policy: optimization of state

and local self-government functions, digital transformation, creation of legal alternatives to corrupt practices, ensuring inevitability of responsibility, and formation of social intolerance to corruption.

The development of strategic foundations became the State Anti-Corruption Program for 2023-2025, approved by the Cabinet of Ministers of Ukraine. The program provides for over 1000 measures to reduce corruption levels and ensure integrity in 15 spheres of public administration [9]. The fact that the program was developed and approved under conditions of full-scale war, requiring consideration of specific wartime challenges, gains particular importance.

An important element of the normative-legal framework is the Law of Ukraine «On Prevention of Corruption,» which establishes legal and organizational foundations for the functioning of the corruption prevention system. This law has been repeatedly supplemented and amended considering international standards and national needs, particularly regarding regulation of whistleblower activities.

Martial law, introduced in Ukraine on February 24, 2022, made significant adjustments to the implementation of anti-corruption policy. Although basic principles and mechanisms of anti-corruption activities remained unchanged, their practical implementation required adaptation to new conditions. In particular, the role of international experts in competitive commissions for selecting heads of anti-corruption bodies was strengthened, and a special procedure for submitting electronic declarations for employees of the Security Service of Ukraine and Foreign Intelligence Service was created.

Special attention deserves the adaptation of monitoring and control mechanisms for implementing anti-corruption policy. The State Anti-Corruption Program for 2023-2025 provides for over 1000 measures to reduce corruption levels and ensure integrity in 15 spheres, monitoring of which is carried out through the Information System for Monitoring Anti-Corruption Policy [9]. This system allows real-time tracking of progress in implementing anti-corruption measures and prompt response to identified problems. Normative-legal support of anti-corruption policy under war conditions is characterized by the need to balance ensuring national security and preserving principles of transparency and accountability. This manifests in establishing special procedures for access to information constituting state secrets while simultaneously preserving possibilities for public control over the use of budget funds and

international aid.

Ukraine's system of specialized anti-corruption bodies includes five key institutions, each having specific functions in forming and implementing anti-corruption policy. NABU, SAP, NACP, and SBI are anti-corruption bodies that Ukrainians hear about almost daily, but their functions and interaction require detailed analysis [7]. The National Agency on Corruption Prevention (NACP) plays a central role in forming anti-corruption policy. NACP is a central executive body of Ukraine with special status that ensures formation and implements state anti-corruption policy. Its key functions include: developing and coordinating implementation of the Anti-Corruption Strategy, conducting anti-corruption expertise of normative-legal acts, maintaining the Unified State Register of declarations of persons authorized to perform state or local self-government functions.

Under war conditions, NACP adapted its activities to new challenges. The agency works on the «War & Sanctions» project – a database of people and companies supporting Russia's war against Ukraine. Twenty-six companies have been included in the list of international war sponsors [7]. This testifies to the expansion of NACP's functions toward combating economic support of aggression against Ukraine. The National Anti-Corruption Bureau of Ukraine (NABU) is a central executive body with special status responsible for prevention, detection, termination, investigation, and disclosure of corruption and other criminal offenses. NABU was created in 2015 to investigate corruption in high-level government circles. Since the beginning of full-scale war, NABU has been dealing with sanctions lists, arresting Russian assets, and transferring deposited bail to the needs of the Armed Forces of Ukraine [7].

The Specialized Anti-Corruption Prosecutor's Office (SAP) ensures procedural guidance of pre-trial investigation, supervises law compliance during operational-investigative activities, pre-trial investigation, and supports public prosecution in relevant proceedings. The number of investigated cases increased after the appointment of Oleksandr Klymenko as head of SAP last summer [7]. The High Anti-Corruption Court (HACC) administers justice in criminal proceedings regarding criminal offenses falling under NABU's jurisdiction. The practice of two years of Anti-Corruption Court operation shows that it is going the right way, ensuring impartial and fair consideration of criminal proceeding materials [7].

The Asset Recovery and Management Agency (ARMA) carries out search and management of assets subject to confiscation in criminal proceedings. Under war conditions, ARMA's

activities gained particular importance in the context of managing arrested assets of Russian and Belarusian citizens and legal entities.

Coordination of anti-corruption bodies' activities is carried out through various mechanisms. Article 18-2 of the Law of Ukraine «On the Foundations of State Anti-Corruption Policy for 2021-2025» establishes coordination of Anti-Corruption Strategy implementation [1]. However, practice shows that constant inter-agency disputes and accusations of «corruption» between anti-corruption bodies are not rare, negatively affecting the effectiveness of anti-corruption policy. Under war conditions, anti-corruption bodies faced new challenges. In 2023, anti-corruption bodies began investigating abuses in the Ministry of Defense, detained acting Minister of Communities and Territories Development Vasyl Lozynskyi, exposed a criminal organization headed by the former head of the State Property Fund. The most resonant case was the detention of Supreme Court Chairman Vsevolod Kniaziev for receiving a \$2.7 million bribe [7].

The effectiveness of anti-corruption policy largely depends on the quality of coordination between different subjects of anti-corruption activities. Under martial law conditions, this coordination gains particular importance as it requires rapid response to new challenges and threats. The main coordinating body at the national level is the National Agency on Corruption Prevention. Development and coordination of Anti-Corruption Strategy implementation is NACP's responsibility, enshrined in law [1]. NACP carries out coordination through a system of monitoring implementation of anti-corruption measures, conducting regular meetings with representatives of other authorities, and preparing analytical reports.

An important coordination tool is the Information System for Monitoring Anti-Corruption Policy, through which every citizen can clearly see how a particular authority combats corruption [9]. This system ensures transparency in implementing anti-corruption measures and allows prompt identification of problem areas. Inter-agency coordination is carried out through creating joint working groups, signing cooperation memoranda, and conducting regular inter-agency meetings. Particularly important is coordination between law enforcement agencies in investigating corruption offenses. Specially authorized subjects in the sphere of combating corruption are prosecutor's offices, National Police, National Anti-Corruption Bureau of Ukraine, and National Agency on Corruption Prevention [10].

Under war conditions, coordination mechanisms required adaptation to new challenges.

In particular, coordination in the sphere of controlling the use of international aid and defense resources was strengthened. Special inter-agency groups were created to monitor the use of funds allocated for defense needs and support of internally displaced persons.

An important aspect of coordination is interaction with international partners. The quality of work and independence of anti-corruption institutions is an important factor in Ukraine's European integration, its relations with international partners, obtaining financial aid and political support [7]. Under war conditions, this interaction gained critical importance, as the effectiveness of the anti-corruption system affects international donors' trust. Coordination of anti-corruption activities at regional and local levels is carried out through a network of authorized persons for corruption prevention and detection. Each ministry and department develops its own anti-corruption program for 2023-2025, which is coordinated with NACP [9]. This ensures a systematic approach to implementing anti-corruption policy at all levels of public administration.

A coordination problem remains insufficient integration of efforts by different authorities. Efforts of various state authorities, local self-government bodies, and the public are insufficiently coordinated [1]. This manifests in duplication of functions, inefficient use of resources, and reduced overall effectiveness of anti-corruption activities. Full-scale war created new challenges for Ukraine's anti-corruption system that require adequate response and adaptation of existing mechanisms. The main challenge is the need to preserve the effectiveness of anti-corruption activities under conditions of concentrating resources on defense needs and limitations related to martial law. The first significant challenge is related to transparency in using defense resources. Martial law objectively requires certain secrecy in defense matters, which may create opportunities for corrupt abuse. Since the beginning of full-scale war, bodies deal with sanctions lists, arrest Russian assets, and transfer deposited bail to the needs of the Armed Forces of Ukraine [7]. However, it is necessary to ensure control over the targeted use of these funds.

The second challenge concerns effective control over the use of international aid. Ukraine receives unprecedented volumes of financial and humanitarian aid from international partners. Ensuring transparency and accountability in using these resources is critically important for maintaining donor trust and continuing support.

The third challenge is related to the need to control activities in the sphere of providing

aid to internally displaced persons. The Deputy Head of NACP spoke about anti-corruption safeguards in the sphere of housing for IDPs [10]. The scale of internal population displacement creates significant corruption risks in the sphere of housing distribution, providing social aid, and employment of displaced persons. The fourth challenge concerns preserving the personnel potential of anti-corruption bodies. Martial law led to mobilization of part of anti-corruption body employees, creating a deficit of qualified personnel. However, it is necessary to ensure continuity of anti-corruption activities and maintain high standards of professionalism.

The fifth challenge is related to adapting procedures and work mechanisms to wartime conditions. Martial law limits possibilities for conducting certain procedural actions, complicates access to documents and witnesses, requiring development of alternative mechanisms for ensuring effectiveness of anti-corruption activities. A threat to the anti-corruption system is possible weakening of public control. Under conditions of concentrating public attention on military issues, the level of public activity in the sphere of combating corruption may decrease. This may lead to reduced effectiveness of preventive mechanisms and weakened pressure on authorities from civil society. A serious threat is the risk of using martial law as a pretext for limiting transparency and accountability of authorities. The need to ensure national security should not become an instrument for hiding corrupt schemes or avoiding responsibility for abuse.

An important threat is possible reduction of international support in case of discovering serious corruption scandals. Trust of international partners is critically important for continuing financial and military support to Ukraine. Corruption scandals may negatively affect the level of this support.

Based on the conducted analysis, priority directions for improving mechanisms of state anti-corruption policy formation under war conditions can be identified. These directions should ensure balance between national security needs and preserving principles of transparency and accountability. The first direction is strengthening coordination between anti-corruption bodies. It is necessary to create a permanently operating coordination body under the Cabinet of Ministers of Ukraine or under the President of Ukraine that would ensure operational coordination of all anti-corruption institutions' activities. Such a body should have sufficient powers to make operational decisions regarding function distribution and preventing duplication.

The second direction is developing special mechanisms for controlling the use of international aid. It is necessary to create specialized units in anti-corruption bodies that will specialize in monitoring the use of international donor funds. These units should have direct communication channels with representatives of donor countries and international organizations. The third direction is improving electronic monitoring and control systems. It is necessary to expand the functionality of the Information System for Monitoring Anti-Corruption Policy, ensure its integration with other state electronic systems, and create possibilities for automatic detection of corruption risks [9].

The fourth direction is developing public control mechanisms under martial law conditions. It is necessary to adapt existing forms of public participation to wartime realities, create new communication channels with the public, and ensure access of public organizations to information about budget fund use. The fifth direction is strengthening the preventive component of anti-corruption policy. It is necessary to expand the system of anti-corruption expertise of normative-legal acts, especially those adopted under martial law conditions. It is also important to strengthen work on identifying and eliminating corruption risks at the stage of developing state programs and projects.

The sixth direction is developing international cooperation in the sphere of combating corruption. It is necessary to deepen cooperation with European anti-corruption institutions, introduce regular exchange of experience and best practices, and create mechanisms for mutual assessment of anti-corruption measure effectiveness. The seventh direction is raising the professional level of anti-corruption body employees. It is necessary to develop special training and professional development programs considering the specifics of work under martial law conditions. It is also important to ensure social protection of anti-corruption body employees and their motivation for effective work.

Conclusions. The conducted research allows concluding that mechanisms of state anti-corruption policy formation in Ukraine under war conditions require significant improvement to ensure effective corruption combat while maintaining balance between national security needs and principles of transparency in public administration. Analysis of normative-legal foundations showed that the basic architecture of Ukraine's anti-corruption policy corresponds to international standards and provides legal foundations for effective corruption combat. The Anti-Corruption Strategy for 2021-2025 and State Anti-Corruption Program for 2023-

2025 create a comprehensive system of measures for preventing and combating corruption. However, wartime conditions require adapting these documents to new challenges and threats.

The system of specialized anti-corruption bodies (NACP, NABU, SAP, HACC, ARMA) demonstrated ability to adapt under war conditions. Anti-corruption bodies expanded their activities toward combating economic support of aggression, controlling the use of international aid, and ensuring transparency of defense procurement. However, coordination between these bodies remains insufficient, reducing overall effectiveness of the anti-corruption system. The research identified key challenges for the anti-corruption system under war conditions: the need to ensure transparency in using defense resources and international aid, control over providing aid to internally displaced persons, preserving personnel potential of anti-corruption bodies, and adapting work procedures to wartime conditions. These challenges require developing special response mechanisms and new forms of organizing anti-corruption activities.

Priority directions for improving anti-corruption policy formation mechanisms were substantiated: strengthening coordination between anti-corruption bodies, developing special mechanisms for controlling international aid use, improving electronic monitoring systems, developing public control mechanisms, strengthening the preventive component, deepening international cooperation, and raising employee professional levels. The practical significance of the research lies in formulating specific recommendations for improving anti-corruption policy under war conditions, which can be used by state authorities in developing strategic documents and planning anti-corruption activities.

Prospects for further research are related to in-depth analysis of the effectiveness of specific anti-corruption measures under war conditions, studying the experience of other countries regarding organizing anti-corruption activities in crisis conditions, and developing methodology for assessing anti-corruption policy effectiveness during wartime. An important direction is also studying the role of digital technologies in ensuring transparency and accountability of public administration under martial law conditions.

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