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Public Administration in the Implementation of Preventive Anti-Corruption Mechanisms: A Case Study of Anti-Corruption Declaration in Times of Martial Law

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Obiettivo dello studio è di identificare le ragioni e i motivi che hanno condotto alla sospensione della presentazione delle dichiarazioni elettroniche anticorruzione da parte dei funzionari pubblici in Ucraina, nonché di valutare la loro adeguatezza e significato al momento. Gli autori giungono alla conclusione che il ripristino delle dichiarazioni elettroniche anticorruzione in Ucraina sia attualmente imperativo. Al contempo, propongono un approccio differenziato per le diverse categorie di funzionari pubblici con riguardo alla presentazione delle dichiarazioni, unitamente all'istituzione di misure preventive obbligatorie. Il bilanciamento di tutte queste misure risulta infatti essere cruciale per il processo di ripristino delle dichiarazioni elettroniche anticorruzione. L'oggetto dello studio, considerato come un'attività di ricerca separata e indipendente in Ucraina per la prima volta, ha prospettive di ulteriore esplorazione, soprattutto nel contesto della creazione di meccanismi per l'attuazione di dichiarazioni anticorruzione elettroniche in un quadro giuridico caratterizzato dalla vigenza della legge marziale.

The aim of this study is to identify the reasons and grounds leading to the suspension of the submission of anti-corruption electronic declarations by public servants in Ukraine, as well as to assess their appropriateness and significance at present. The authors reach the conclusion that the reinstatement of anti-corruption electronic declarations in Ukraine is currently imperative. Simultaneously, the authors propose a differentiated approach for different categories of public servants regarding declaration submissions, along with the establishment of mandatory preventive

measures. Balancing these measures is crucial to the restoration process of anti-corruption electronic declarations. The subject of the study, considered a separate and independent research endeavor in Ukraine for the first time, holds prospects for further exploration, especially in the context of establishing mechanisms for implementing anti-corruption electronic declarations in times of a legal framework of martial law.

Summary: 1. Introduction.- 2. Methods.- 3. Results.- 4. Discussion.- 4.1. Prerequisites for the regulatory update of the regulation regarding anti-corruption declarations during the period of martial law.- 4.2. Declaration risks for individuals authorized to hold positions in state or local government roles.- 4.3. Peculiarities of transformation of the declaration subject during the period of legal martial law framework.- 5. Conclusion.- 6. Bibliographical References.

1. Introduction

The evolution of Ukraine's corruption prevention system has traversed a complex trajectory of formation and development. Preventive anti-corruption mechanisms have become ingrained, operating automatically, and are perceived by both society and public officials as an obligatory component of public authorities' functionality. The imposition of the legal framework of martial law posed a challenge to the national corruption prevention system at large, affecting the application of specific preventive anti-corruption measures. This distinctive legal framework primarily aims to mobilize the entire society to safeguard Ukraine, uphold its territorial integrity, and protect national interests. In addition, it emphasizes the need for a balance to be struck between the use of preventive measures against corruption and maintaining the integrity of Ukraine's corruption prevention system, especially when it comes to disseminating information about public officials, protecting their lives and health, reducing threats, and other related issues. In this context, reevaluation of the decision to halt anti-corruption electronic declarations in Ukraine, undertaken after a year and a half of conflict, becomes imperative^[1].

As of the beginning of 2022, the establishment of Ukraine's corruption

prevention system, mechanisms for preventing corruption, and the cadre of entities specially authorized to combat corruption, tasked with ensuring their effective implementation, was in its final stage. Clearly, the operation of the corruption prevention system in Ukraine, as well as the content and application procedures of anti-corruption mechanisms required refinement, further enhancement of their effectiveness, the incorporation of global anti-corruption practices, and alignment in line with the norms and standards of the European Union. One of the most effective anti-corruption mechanisms that has proved its importance is financial control, which includes:

- 1) submission of declarations individuals authorized to carry out duties within the state or local government, including the recording and public disclosure of declarations;
- 2) monitoring and verification of declarations;
- 3) establishing the punctuality of declaration submission;
- 4) a comprehensive review of declarations;
- 5) monitoring the lifestyle of individuals subjects to declaration^[2].

In addition, electronic declaration is characterized by complexity, as it enables the detection of a significant majority of corruption and related offenses. With the help of electronic declaration, additional anti-corruption measures and restrictions are also implemented, including monitoring the lifestyles of individuals subject to declaration (Article 514) a special check (pp. 56-58), The process for conducting a special inspection of individuals applying for roles involving significant responsibility or positions at heightened risk of corruption, as stipulated by the Resolution of the Cabinet of Ministers of Ukraine dated March 25, 2015^[3], preventing and resolving conflicts of interest (Articles 28-36) restrictions on receiving gifts (Articles 23-24), etc^[4].

Given this, a primary focus in enhancing electronic declaration has become the proper implementation of the Unified State Register of Declarations of individuals authorized to hold positions in state or local government. This involves the creation and carrying out tools for automated control over the submission of declarations, the accuracy of their completion, identification of deficiencies, violations, discrepancies, and the like. The introduction of the legal regime of martial law, as outlined in the Presidential Decree “On the Introduction of Martial Law in Ukraine” dated February 24, 2022^[5], approved

by the Law of Ukraine No. 2102-IX dated February 24, 2022^[6], affected all spheres of public life, with the prevention and counteraction of corruption being no exception.

On February 24, 2022, the National Agency on Corruption Prevention (NACP) restricted access to the public section of the Declaration Register due to technical maintenance aimed at maximizing the protection of personal data of declarants, political parties, and other users under the circumstances of martial law. However, access to the declarant's personal cabinet in the Declaration Register continued to operate in the regular mode^[7].

The apparent rationale behind this decision was the necessity to conceal information regarding the contact details of individuals directly engaged in countering armed aggression towards Ukraine. The disclosure of such information, including through the submission of electronic declarations, could jeopardize their lives, health, and the effective execution of their respective responsibilities. Subsequently, on February 28, 2022, in Clarification No. 2 regarding the enforcement of specific provisions of the Law of Ukraine "On Prevention of Corruption" concerning financial control measures during martial law, the NACP stated that declarants should abstain from submitting declarations or notifications of significant changes in their financial status^[8].

On March 7, 2022, the Law of Ukraine No. 2115-IX "On the Protection of the Interests of Entities Submitting Reports and Other Documents during the Period of Martial Law or State of War" came into effect, which was enacted on March 3, 2022^[9]. According to its provisions, individuals are required to submit documents, the submission of which is mandated by the existing legal framework, in documentary or electronic format, within three months following the conclusion or cancellation of martial law or a state of war, for the entire duration of the requirement to submit documents^[10].

Despite the absence of explicit provisions regarding electronic declarations in the Law of Ukraine "On Prevention of Corruption"^[11], in Clarification No. 4 issued on March 7, 2022, the NACP judiciously extended its applicability to electronic declarations^[12]. Consequently, the submission of electronic declarations was also postponed until the end or repeal of martial law. On May 20, 2022, the Law of Ukraine No. 2259-IX^[13], came into effect, which also stipulated an exemption from the obligation to submit electronic declarations for candidates applying for

positions in public service, along with the conduct of special checks concerning them.

On August 3, 2022, the Law of Ukraine No. 2381-IX, 2022, came into effect^[14]. Among other provisions, it stipulates that a declarant with a corresponding obligation is required to submit a declaration for an individual authorized to hold positions in state or local government, which is due during the period of martial law. The declarant is also obligated to submit a notification of significant changes in financial status, grounds that arose during the period of martial law. Additionally, the declarant must submit a notification of opening a foreign currency account at a non-resident bank, the grounds for which arose during the duration of martial law, within ninety calendar days from the date of cessation or abolition of martial law.

Currently, after a year and a half of widespread aggression against Ukraine and the imposition of the legal framework governing martial law, it is increasingly evident that military actions are ongoing, leading to the prolonged duration of the martial law regime. Considering the uncertainty and apparent prolonged nature of the military situation, the suspension of almost all financial control measures, including declaration requirements, seems unjustified. This situation creates favorable conditions for potential abuses by unscrupulous public officials. The postponement of declaring during martial law not only impedes the implementation of anti-corruption policies in the country but also complicates the subsequent verification of information provided in the declarations. Meanwhile, the necessity for the appropriate functioning of preventing corruption and counteraction system has not decreased; on the contrary, it has increased. Considering this, there is an objective need to resume the submission of electronic declarations by public servants.

Leading international anti-corruption organizations have called on the Ukrainian government to resume the declaration of public officials, conduct declaration checks, and implement other financial control measures. Transparency International, for instance, notes that Ukraine received a score of 33 out of 100 points in the Corruption Perceptions Index for the year 2022 and recommends the restoration of the declaration process^[15]. Similarly, the International Monetary Fund, in a memorandum dated March 31, 2023, emphasizes the necessity of reinstating mandatory electronic declaration and restoring the

NACP function of declaration verification^[16]. Therefore, the requirement for public servants to submit electronic anti-corruption declarations should be reinstated^[17].

2. Methods

Doctrine-based discussions on the issue of resuming anti-corruption declarations during the duration of martial law are lacking. The theoretical foundation of this research draws from works related, firstly, to corruption prevention and the application of financial control in general. In this regard, significant conclusions regarding the priority directions of transforming the mechanism of corruption prevention include increasing accountability for committing corrupt offenses and the implementation and efficient application of tools designed to detect corruption, as proposed by Kivalov^[18]. It is essential to consider the justification of criteria for contextually applied motivation in exemption from liability due to the insignificance of the committed corruption-related offense^[19]. The specificity of anti-corruption declaration in Ukraine before full-scale war was investigated by Kornuta, Goloyadova, Reva, and Zavorodnia^[20].

As a result, the indicators of anti-corruption declaration are commonly defined by its orientation towards preventing, averting, and aiding in the identification of indicators of corruption and violations of anti-corruption regulations, prohibitions, and restrictions. It involves objectivization through activities related to verifying the financial status of subjects covered by anti-corruption legislation. Non-compliance with the duty of anti-corruption declaration entails the implementation of state enforcement measures, and so forth.

Secondly, the foundation is based on works related to factors influencing contemporary anti-corruption declaration. Among these, considerations include ensuring national security^[21], defining the topic of national security^[22], shaping policies in the field of national security^[23], highlighting national specifics in regulating social relations^[24]. In this context, this article represents the first exploration of the issues surrounding the full restoration and application of anti-corruption declaration by public officials in Ukraine under contemporary conditions. There is a focus on the importance of taking into account the circumstances and limitations outlined by the legal framework of martial law.

Throughout research process, different approaches to scientific inquiry were employed. General and specific methods were utilized to acquire broad and specific knowledge, respectively. The method of systemic analysis was employed to investigate objects as holistic systems, analyzing their structure and interactions. The dialectical method was applied for analyzing changes and development through the interaction of contradictions. Formal-logical methods were used for logically structuring arguments and conclusions. The structural-functional method was utilized to investigate the structure of objects and their functional interactions. Additionally, empirical methods were employed for the collection and analysis of specific data obtained through observations. These methods facilitated a profound examination of the researched problem and the objects under investigation.

3. Results

Since the beginning of 2023, the NACP has initiated monitoring of the voluntary submission of electronic declarations by public officials. As of the early months of 2023, for the year 2021, according to the data from NACP, a total of 473,404 declarations were submitted by approximately 700,000 declarants^[25]. The distribution of the number of electronic declarations submitted is presented based on various types of declarations and different categories of officials (Figure 1).

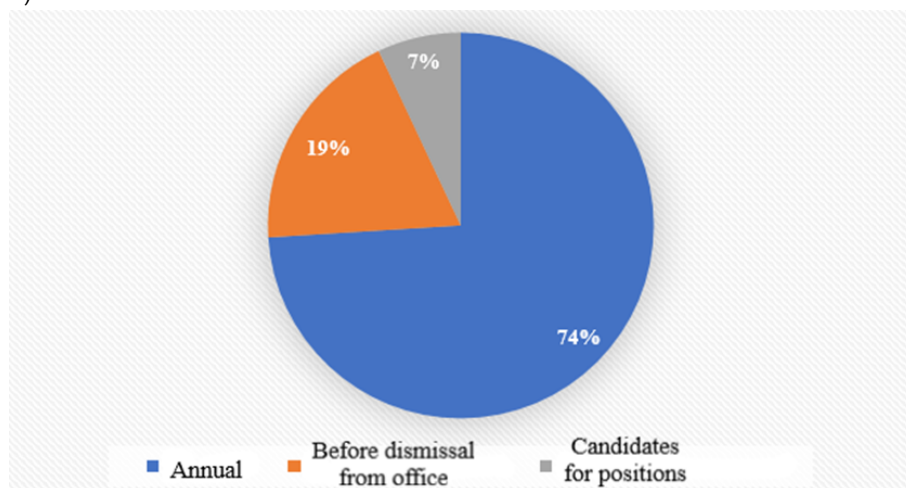


Figure 1. The percentage of electronic declarations submitted divided by the

various kinds of declarations

At the same time, officials holding responsible and especially responsible positions submitted only 33,000 declarations, which is less than 7% of the entire number of submitted declarations (Figure 2).

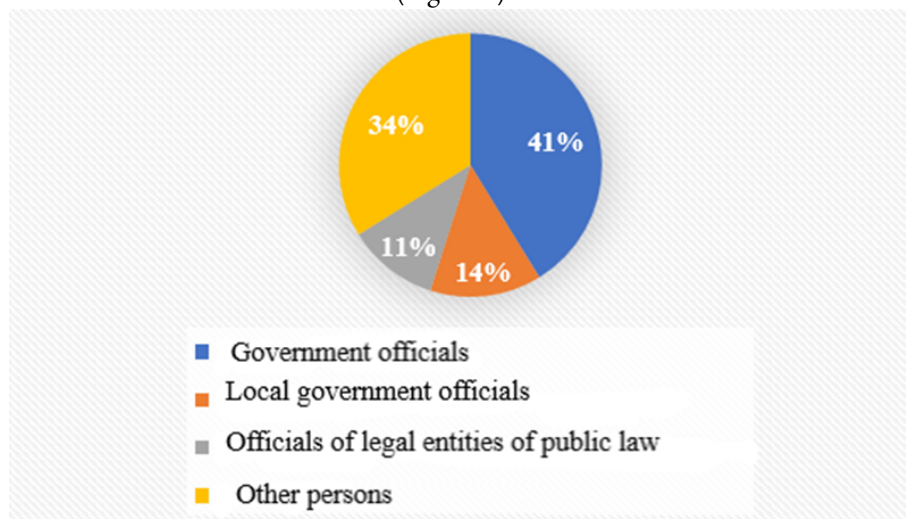


Figure 2. Ratio of the number of submitted electronic declarations by different categories of officials

This, undoubtedly negative trend, seems to have led to even more meticulous attention to the voluntary submission of electronic declarations by public officials occupying positions of responsibility and particularly high responsibility both quantitatively and qualitatively (in terms of their separate categories)^[26]. From March 2023, the National Agency for Corruption Prevention launched the 2021 declaration submission counter, which became a tool to monitor the trend of weekly and monthly submission of electronic declarations (Table 1)^[27].

Table 1. The number of declarations submitted by officials as of 2023

No.	Name of the position	As of March 13, 2023	As of March 27, 2023	As of April 3, 2023	As of May 1, 2023	As of May 29, 2023	As of July 3, 2023	As of July 31, 2023	As of August 28, 2023	As of September 18, 2023
1.	Civil servants of the "A" and "B" categories	29 193	30459 (+2%)	31648 (+4%)	33015 (+4%)	33710 (+2%)	34258 (+1%)	34802 (+1%)	35428 (+2%)	36013 (+2%)
2.	People's Deputies	29	31	32	39 (+18%)	39	42 (+7%)	44 (+4%)	48 (+8%)	53 (+9%)

3.	Ministers	2	3	3	3	4	4	5	5	5
4.	Deputy heads of the Office of the President	2	3	3	3	3	3	3	3	4
5.	Judges	1715	1853 (+4%)	2044 (+9%)	2175 (+6%)	2263 (+4%)	2356 (+4%)	2465 (+4%)	2570 (+4%)	2655 (+3%)
6.	Prosecutors, investigators	7980	8446 (+3%)	8858 (+5%)	9324 (+5%)	9530 (+2%)	9624 (+1%)	9796 (+2%)	9975 (+2%)	10128 (+1%)
7.	Heads of regional state (military) administrations	5	5	5	6	7	7	7	7	7

Source: National Agency of Corruption Prevention^{[28] [29] [30] [31] [32] [33]}.

The analysis of weekly and monthly quantitative and qualitative indicators of voluntary declaration submission reveals modest percentages of declaration submissions across different categories of public officials. This further underscores the necessity of reinstating the declaration submission process.

4. Discussion

4.1. Prerequisites for the regulatory update of the regulation regarding anti-corruption declarations during the period of martial law

While there is consensus among most theorists and practitioners regarding the necessity of reinstating anti-corruption declaration and electronic submission of declarations by public servants, divergent positions emerge when it comes to how this should be implemented.

On September 23, 2022, draft law No. 8071, proposing amendments to certain laws of Ukraine to conform with the requirements of the European Commission for Ukraine's attainment of European Union membership status^[34]. The draft law suggests to obligate individuals who did not submit a declaration as an individual authorized to carry out duties in state or local government in 2022, as

stipulated by Article 45 of the Law of Ukraine “On Prevention of Corruption”, and/or notifications outlined in parts 1 and 4 of Article 52 of the same law, to submit such declarations and notifications no later than 60 calendar days from the date the Law of Ukraine “On Amendments to Certain Laws of Ukraine Aimed at Fulfilling the Requirements of the European Commission Regarding Ukraine’s Acquisition of the Status of a Member of the European Union” enters into force (draft No. 8071)^[35].

Additionally, the draft proposes to exclude from the Law of Ukraine “On the Legal Regime of Martial Law” the provision stating that a person aspiring to political office, a position within the civil service, a position within local self-governing bodies, a position of the head of a state-owned economic entity, or the head of a municipal enterprise, institution, organization, during the period of martial law, does not submit a declaration as an individual authorized to perform functions in state or local self-government, as stipulated by the Law of Ukraine “On Prevention of Corruption”.^[36]

As of now, draft law No. 8071 is under review by the Verkhovna Rada of Ukraine^[37]. Considering this, it is necessary to highlight the main shortcomings of the mentioned draft law. In some parts of Ukraine, armed conflicts are ongoing, and the activities of a significant number of state authorities and local self-government bodies have been blocked. Moreover, the exact number of individuals authorized to perform duties in state or local self-government cannot be determined who are temporarily under occupation due to armed aggression. Therefore, the restoration of declaration submission for all subjects is not considered appropriate.

The Ukrainian state had no prior experience in regulating social relations under the circumstances of martial law, presenting new challenges faced by the country. To ensure the protection of rights and freedoms of citizens authorized to fulfill duties in state or local government, obligated to adhere to financial control requirements, and to prevent the development of corruption on Ukrainian territories, there is a need to develop an effective mechanism for implementing anti-corruption measures, taking into account the state of martial law^[38].

Thus, the key prerequisite for the normative update of anti-corruption declaration is ensuring the state’s national security and compliance with international standards as a condition for the support of Ukraine by international

partners. This is prompted by the fact that national security, covering all spheres of public relations, should adhere to fundamental principles of public administration such as the rule of law and good governance, as well as international standards in national security, including gender equality and transparency of information national security status, democratic oversight of public institutions, sectoral organization of national security, and alignment of global security trends with national interests^[39].

4.2. Declaration risks for individuals authorized to hold positions in state or local government roles

The reinstatement of the obligation to declare for all subjects-individuals authorized to perform duties in state or local government could result in a situation where the declarant violates the requirements of the Law of Ukraine “On Prevention of Corruption” and is subjected to certain penalties due to circumstances objectively beyond the control of the declarant. For example, the NACP provided Explanation No. 4 dated March 7, 2022, concerning question of “whether it is necessary to declare information about property in the event of its destruction consequently hostilities during the armed aggression of the Russian Federation against Ukraine to submit notifications of significant changes in property due to its destruction”^[40]. NACP stated that “in the event of the destruction of real estate, information about such property should be reflected in Section 3 ‘Real Estate’ of the declaration until the information about such property is excluded from the State Register of Property Rights. Destroyed vehicles are deregistered in compliance with established legislative procedure. Before deregistration of the destroyed vehicle, information about it is reflected in Section 6 ‘Valuable Movable Property - Vehicles’ of the declaration”^[41].

In this case, a situation may arise where the declarant and/or members of their family, who resided in the territory temporarily occupied as of the declaration submission date, are well aware of the destruction of their property (movable or immovable) because of armed aggression. However, the declarant and/or members of their family lack legal documents with which the declarant and/or members of their family can apply to the state registrar with a request to exclude information about the destroyed real estate from the State Register of Property

Rights or with a request to deregister the destroyed vehicle.

Under such conditions, due to reasons beyond the declarant's control, inaccurate information may be provided in the e-declaration. It is evident that some declarants may be located in temporarily occupied territories and, accordingly, may not have the objective opportunity to report by submitting a declaration. This circumstance confirms the thesis that reinstating the obligation to declare for all declarants is inappropriate under the state of martial law. Instead, when addressing the issue of resuming e-declaration, the peculiarities of society's life in a state of martial law should be taken into consideration. Considering that actual hostilities are not taking place throughout the entire territory of Ukraine; it is appropriate to resume e-declaration based on the declarant's actual location.

Thus, according to the order of the Ministry of Reintegration of Temporarily Occupied Territories "On Approval of the list of territories where hostilities are taking place (have taken place) or temporarily occupied by the Russian Federation," the territories where hostilities are ongoing and those temporarily occupied by the Russian Federation in Ukraine have been identified^[42]. According to this Order, the list is updated as needed but no less than twice a month.

Hence, state has the possibility to establish a deferral of declaration submission for declarants located in the territories listed where hostilities are occurring or temporarily occupied by the Russian Federation. Additionally, the approved list contains a separate column specifying the date when hostilities cease, the date of the end of hostilities, and the date of the end of temporary occupation. Therefore, it is possible to set a deadline for e-declaration submission for declarants located in the territories listed where hostilities are ongoing or in territories temporarily occupied, starting from the date when the possibility of hostilities was terminated, actual hostilities were concluded, or temporary occupation ended. In this regard, declarants located in territories controlled by Ukraine, who do not face circumstances preventing the submission of e-declarations, are obliged to continue complying with financial control measures. Therefore, it is proposed to establish a territorial criterion when determining the postponement of e-declaration based on the information contained in the list of territories where hostilities are taking place or temporarily occupied territories, approved by the order of the Ministry of Reintegration of Temporarily

Occupied Territories. For all declarants located on the territory of Ukraine where hostilities are not taking place, financial control measures will continue to apply. This will contribute to achieving the objectives of anti-corruption legislation and fulfilling Ukraine's international obligations in the realm of corruption prevention.

4.3. Peculiarities of transformation of the declaration subject during the period of legal martial law framework

The organization of activities by declarants in terms of collecting and transferring monetary funds or other property for the benefit of the Armed Forces of Ukraine, as well as other military formations established in accordance with the laws of Ukraine, voluntary formations of territorial communities, intelligence agencies, law enforcement agencies, and individuals affected by armed aggression deserves particular attention.

On 26.07.2023, under No. 9534, a draft law was registered in the Verkhovna Rada of Ukraine regarding amendments to certain laws of Ukraine defining the procedure for submitting declarations by individuals authorized to perform functions in state or local self-government during martial law^[43]. This draft law proposes to establish that individuals who have not submitted a declaration for the years 2022-2023 as persons individuals authorized to perform functions in state or local government must submit such declarations no later than 90 calendar days from the date this law takes effect.

Additionally, it is proposed to introduce a new category of declarants, namely, individuals subject to declaration requirements who perform duties related to national security or are situated in territories affected by the military aggression of the Russian Federation against Ukraine. They are to submit the relevant declaration within the timeframes specified for those who submit declarations in a special procedure. In essence, there is a shift in the focus of regulation from the subject of declaration to the declarant, for whom the declaration of these items is legitimate.

At the same time, it is important to focus on reservations expressed by the NACP regarding this draft law. According to NACP, the implementing the necessary technical solutions to enable access to declarations while simultaneously

restricting access to data about other individuals mentioned in the declaration, as well as data about security and defense officials, will require additional time, financial resources, and human resources. The establishment, as an initial step, of registries for security and defense officials, and ensuring access to these through the Declaration Registry, should be included in the final and transitional provisions of the draft law^[44].

These proposed legislative amendments demonstrate the awareness of Ukrainian parliamentarians regarding the need to renew the implementation of financial control measures in accordance with the provisions outlined in the Law of Ukraine “On Prevention of Corruption”^[45]. Overall, the aforementioned observations are also applicable to this draft law. Additionally, during the resumption of electronic declaration submission, it is essential to consider the need for:

1. Ensuring the proper technical functioning of the Unified State Register of Declarations of individuals authorized to perform duties in state or local self-government;
2. Ensuring the confidentiality of information regarding the contact details of official persons within public administration entities, disclosing information about whose declaration submission may endanger their life, health, or the effectiveness of their duties;
3. Establishing a transitional period for the submission of declarations for previous periods, as relevant declarants will need to submit annual declarations for the years 2021-2022, declarations before dismissal and after dismissal, as well as notifications of significant changes in their property status.

5. Conclusion

Addressing the matter of anti-corruption declarations in Ukraine, particularly in light of its suspension due to widespread aggression against Ukraine and the imposition of martial law, requires urgent resolution. The thesis is put forward that a crucial precondition for the normative updating the anti-corruption declaration is crucial for ensuring national security of the state and compliance with international standards as a condition for the support of international partners. It is identified that there is a possibility to establish a deadline for the

submission of e-declarations for declarants located in territories listed as those where hostilities are occurring or territories have been temporarily occupied, beginning from the day when the possibility of hostilities was terminated, actual hostilities ceased, or temporary occupation ended. Meanwhile, declarants situated in territories under Ukraine's control, who do not face circumstances preventing the submission of e-declarations, are obligated to continue adhering to financial control measures.

It is proposed to establish a territorial criterion for determining the deferral of e-declaration depending on the information contained in the roster of territories where hostilities are happening or are temporarily occupied by the Russian Federation, endorsed by the Ministry of Reintegration of Temporarily Occupied Territories. Financial control measures will continue to apply to all declarants located in territories under Ukraine's control. This will contribute to achieving the goals of anti-corruption legislation and fulfilling Ukraine's international obligations in the realm of corruption prevention.

During the resumption of electronic declaration submission, it is necessary to consider the need for: 1) ensuring the proper technical functioning of the Unified State Register of Declarations of individuals authorized to hold positions in state or local self-government; 2) ensuring the confidentiality of information regarding the contact information of official persons of subjects of public administration, disclosure of information about the submission of which could jeopardize their life, health, or the effectiveness of their duties; 3) establishing a transitional period for the submission of declarations for previous periods, as relevant declarants will need to submit annual declarations for the years 2021-2022, declarations before dismissal and after dismissal, as well as notifications of significant changes in their property status.

6. Bibliographical References

- L. Bila-Tiunova, T. Bilous-Osin, D. Kozachuk, V. Vasylykivska, (2019). *Participation of Civil Society in Public Administration: Prospects for International Experience Implementation in Ukraine*, in *Humanities & Social Sciences Reviews*, 7(5), 2019, pp. 757-764.
- A. Iatsyshyn, A. Iatsyshyn, V. Kovach, I. Zinovieva, V. Artemchuk, O. Popov, O.

- Cholyshkina, O. Radchenko, O. Radchenko, A. Turevych, *Application of Open and Specialized Geoinformation Systems for Computer Modelling Studying by Students and PhD Students*, in *CEUR Workshop Proceedings*, 2020, pp. 893-908.
- I. Kalina, V. Khurdei, V. Shevchuk, T. Vlasjuk, I. Leonidov, *Introduction of a corporate Security Risk Management System: The Experience of Poland*, in *Journal of Risk and Financial Management*, 15(8), 2022, pp. 330-335, DOI:10.3390/jrfm15080335
- S.V. Kivalov, *Anti-Corruption Mechanism in Ukraine: Content Actualization under the Conditions of Normative Innovations*, in *Cuestiones Políticas*, 39(71), 2021, pp. 972-985.
- S. Kivalov, (2023). *Public Administration in the Field of National Security: Updating Content during Martial Law*, in *Amazonia Investiga*, 12(65), 2023, pp. 68-76.
- O.P. Khamkhodera, *Insignificance of Administrative Misconduct Regarding the Conflict of Interest: Acceptability and Criteria. Public Administration under Modern Conditions: Concept, Features, Challenges*, Izdevniecība "Baltija Publishing", 2020
- L. Kornuta, T. Goloyadova, Y. Zavhorodnia, Y. Reva, *Anti-Corruption Declaration as a Measure of Control for the Activities of Subjects of Public Authorities*, in *Journal of Environmental Treatment Techniques*, 8(4), 2020, pp. 1504-1509.
- Y. Mekh, I. Georgiievskiy, I. Ignatchenko, I. Maslova, I. Kostenko, *Public-Private Partnership in the Security Sector: Updating in the Conditions of Counteracting the Covid-19 and Armed Aggression in Eastern Ukraine*, in *Revista De La Universidad Del Zulia*, 13(37), 2021, pp. 347-361.
- Y. Mekh, A. Slavytska, N. Bilak, I. Georgiievskiy, Y. Maslova, *Features of the Segmental Formation of Ukrainian Politics under Martial Law*, in *Review of Economics and Finance*, 21, 2023, pp. 286-294. DOI:10.55365/1923.x2023.21.27
- Y.O. Reva, *Anti-Corruption Declaration: Theory, Legal Regulation, Practice*, Pravo, 2020
- O. Shevchuk, *The Security Sector of Ukraine as an Object of Public Administration*, in *Pidpryyemnytstvo, Hospodarstvo i Pravo*, 2, 2021, pp. 138-142, DOI:10.32849/2663-5313/2021.2.25

H.P. Sytnyk, O.A. Zubchuk, M.H. Orel, *Conceptual Understanding of the Peculiarities of Managing Innovation-Driven Development of the State in the Current Conditions*, in *Science and Innovation*, 18(2), 2022, pp. 3-15, DOI:10.15407/scine18.02.003

S. Zadereiko, *Technological Processes of Combating Corruption of Our Time*, in *Journal of International Legal Communication*, 5(2), 2022, pp. 69-78. DOI:10.32612/uw.27201643.2022.5.pp.69-78

B.R. Zayats, (2020). *To the Problem of Mechanisms for Involving Civil Society Institutions in the Process of Preventing Corruption in Ukraine Improvement*, in *Legal Horizons*, 22(35), 2020, pp. 22-28. DOI:10.21272/legalhorizons.2020.i22.p22

1. Y.O. Reva, *Anti-Corruption Declaration: Theory, Legal Regulation, Practice*, Pravo, 2020.
2. H.P. Sytnyk, O.A. Zubchuk, M.H. Orel, *Conceptual Understanding of the Peculiarities of Managing Innovation-Driven Development of the State in the Current Conditions*, in *Science and Innovation*, 18(2), 2022, pp. 3-15, DOI:10.15407/scine18.02.003.
3. Resolution of the Cabinet of Ministers of Ukraine No. 171-2015-p "On the Approval of the Procedure for Conducting a Special Inspection of Persons Applying for Positions that Involve...", 2025, in <https://zakon.rada.gov.ua/laws/show/171-2015-%D0%BF#n11>.
4. Law of Ukraine No. 2381-IX "On Amendments to the Law of Ukraine "On Prevention of Corruption" Regarding the Specifics of the Application of Legislation in the Field of Prevention of Corruption in Martial Law", 2022, in <https://zakon.rada.gov.ua/laws/show/2381-20#Text>.
5. Decree of the President of Ukraine No. 64/2022 "On the Introduction of Martial Law in Ukraine", 2022, in <https://zakon.rada.gov.ua/laws/show/64/2022#Text>.
6. Law of Ukraine No. 2102-IX "On the Approval of the Decree of the President of Ukraine "On the Introduction of Martial Law in Ukraine", 2022, in <https://zakon.rada.gov.ua/laws/show/2102-20#Text>.
7. National Agency of Corruption Prevention, *Access to the Public Part of the Register of Declarations, the Register of POLITDATA Party Reports and the Register of Corrupt Persons Is Limited*. 2022d, in <https://nazk.gov.ua/uk/novyny/dostup-do-publichnoyi-chastyny-reyestru-deklaratsij-reyestru-zvitiv-partij-politdata-ta-reyestru-koruptsiy-obmezhenno/>.
8. National Agency of Corruption Prevention, *Clarification on the Application of Certain Provisions of the Law of Ukraine "On Prevention of Corruption" Regarding Financial Control Measures under Martial Law Conditions*, 2022c, in <https://nazk.gov.ua/uk/documents/roz-yasnennya-vid-28-02-2022-2-shhodo-zastosuvannya-okremyh-polozhen-zakonu-ukrayiny-pro-zapobigannya-koruptsiyi-stosovno-zahodiv-finansovogo-kontrolyu-v-umovah-voyennogo-stanu/>.

9. Law of Ukraine No. 2115-IX “On the Protection of the Interests of Subjects Submitting Reports and Other Documents during the Period of Martial Law or a State of War”, 2022, in <https://zakon.rada.gov.ua/laws/show/2115-20/ed20220303#Text>.
10. B.R. Zayats, (2020). *To the Problem of Mechanisms for Involving Civil Society Institutions in the Process of Preventing Corruption in Ukraine Improvement*, in *Legal Horizons*, 22(35), 2020, pp. 22-28. DOI:10.21272/legalhorizons.2020.i22.p22.
11. Law of Ukraine No. 2381-IX “On Amendments to the Law of Ukraine “On Prevention of Corruption” Regarding the Specifics of the Application of Legislation in the Field of Prevention of Corruption in Martial Law”, 2022, in <https://zakon.rada.gov.ua/laws/show/2381-20#Text>.
12. National Agency of Corruption Prevention, *Clarification Regarding the Application of Certain Provisions of the Law of Ukraine “On Prevention of Corruption” in Relation to Financial Control Measures under Martial Law (Declaration Submission, Notification of Significant Changes in Property Status, Notification of Opening a Foreign Currency Account in a Non-Resident Bank Institution, Conducting Inspections)*, 2022b, in <https://nazk.gov.ua/uk/documents/roz-yasnennya-4-vid-07-03-2022-shhodo-zastosuvannya-okremykh-polozhen-zakonu-ukrayiny-pro-zapobigannya-koruptsiyi-stosovno-zahodiv-finsanovogo-kontrolyu-v-umovah-voyennogo-stanu-podannya-deklaratsiyi-p/?hilite=>.
13. Law of Ukraine No. 2259-IX “On Making Changes to Some Laws of Ukraine Regarding the Functioning of the Civil Service and Local Self-Government during the Period of Martial Law”. 2022, in <https://zakon.rada.gov.ua/laws/show/2259-20#Text>.
14. Law of Ukraine No. 2381-IX “On Amendments to the Law of Ukraine “On Prevention of Corruption” Regarding the Specifics of the Application of Legislation in the Field of Prevention of Corruption in Martial Law”, 2022, in <https://zakon.rada.gov.ua/laws/show/2381-20#Text>.
15. Transparency International Ukraine, *The Pendulum of Fighting Corruption in Ukraine: a Step forward after a Step Back*, 2023, in <https://ti-ukraine.org/news/mayatnyk-borotby-z-koruptsiyeyu-v-ukrayini-krok-vpered-pi-slya-kroku-nazad/>.
16. International Monetary Fund, *Ukraine: Request for an Extended Arrangement Under the Extended Fund Facility and Review of Program Monitoring with Board Involvement-Press Release; Staff Report; and Statement by the Executive Director for Ukraine*, 2023, in https://www.imf.org/en/Publications/CR/Issues/2023/03/31/Ukraine-Request-for-an-Extended-Arrangement-Under-the-Extended-Fund-Facility-and-Review-of-531687?fbclid=IwAR3ismVUejFJuAxL760KZv6sU7JuN0M2uMC_Y9FXFtKUFZzSq2VzWQ3r9w/.
17. I. Kalina, V. Khurdei, V. Shevchuk, T. Vlasniuk, I. Leonidov, *Introduction of a corporate Security Risk Management System: The Experience of Poland*, in *Journal of Risk and Financial Management*, 15(8), 2022, pp. 330-335, DOI:10.3390/jrfm15080335.
18. S.V. Kivalov, *Anti-Corruption Mechanism in Ukraine: Content Actualization under the Conditions of Normative Innovations*, in *Cuestiones Politicas*, 39(71), 2021, pp. 972-985.

19. O.P. Khamkhodera, *Insignificance of Administrative Misconduct Regarding the Conflict of Interest: Acceptability and Criteria. Public Administration under Modern Conditions: Concept, Features, Challenges*, Izdevniecība "Baltija Publishing", 2020.
20. L. Kornuta, T. Goloyadova, Y. Zavorodnia, Y. Reva, *Anti-Corruption Declaration as a Measure of Control for the Activities of Subjects of Public Authorities*, in *Journal of Environmental Treatment Techniques*, 8(4), 2020, pp. 1504-1509.
21. Y. Mekh, I. Georgiievskiy, I. Ignatchenko, I. Maslova, I. Kostenko, *Public-Private Partnership in the Security Sector: Updating in the Conditions of Counteracting the Covid-19 and Armed Aggression in Eastern Ukraine*, in *Revista De La Universidad Del Zulia*, 13(37), 2021, pp. 347-361.
22. O. Shevchuk, *The Security Sector of Ukraine as an Object of Public Administration*, in *Pidpryyemnytstvo, Hospodarstvo i Pravo*, 2, 2021, pp. 138-142, DOI:10.32849/2663-5313/2021.2.25.
23. Y. Mekh, A. Slavytska, N. Bilak, I. Georgiievskiy, Y. Maslova, *Features of the Segmental Formation of Ukrainian Politics under Martial Law*, in *Review of Economics and Finance*, 21, 2023, pp. 286-294. DOI:10.55365/1923.x2023.21.27.
24. L. Bila-Tiunova, T. Bilous-Osin, D. Kozachuk, V. Vasylykivska, (2019). *Participation of Civil Society in Public Administration: Prospects for International Experience Implementation in Ukraine*, in *Humanities & Social Sciences Reviews*, 7(5), 2019, pp. 757-764.
25. National Agency of Corruption Prevention, *Only 33,000 Officials with High Corruption Risks Submitted Declarations for 2021*. 2023c, in <https://nazk.gov.ua/uk/novyny/deklaratsiyi-za-2021-rik-podaly-lyshe-33-tys-posadovtsiv-i-z-vysokymy-koruptsiynymy-ryzykam/>.
26. S. Zadereiko, *Technological Processes of Combating Corruption of Our Time*, in *Journal of International Legal Communication*, 5(2), 2022, pp. 69-78. DOI:10.32612/uw.27201643.2022.5.pp.69-78.
27. National Agency of Corruption Prevention, *NACP Has Launched a Counter for Submitting Declarations for 2021*, 2023b, in <https://nazk.gov.ua/uk/novyny/nazk-zapustilo-lichylnyk-podannya-deklaratsij-za-2021-rik/>.
28. National Agency of Corruption Prevention, *The Dynamics of Declarations Increased: More than 7,400 People Submitted Declarations for 2021 in One Week*, 2023d, in <https://nazk.gov.ua/uk/novyny/dynamika-deklaruvannya-zroslo-za-tyzhden-deklaratsiyi-za-2021-rik-podaly-ponad-7-4-tys-osib/>.
29. National Agency of Corruption Prevention, *Over the Past Week, Twice As Many Officials Were Declared As During the Previous One*, 2023e, in <https://nazk.gov.ua/uk/novyny/za-mynulyj-tyzhden-zadeklaruvalosya-vidvichi-bilshe-posadovtsiv-nizh-za-poperednij/>.
30. National Agency of Corruption Prevention, *Over the Past Week, Officials Submitted 12,800 Annual Declarations*, 2023f, in

- <https://nazk.gov.ua/uk/novyny/za-mynulyj-tyzhden-posadovtsi-podaly-12-8-tys-shhorichnyh-deklaratsij/>.
31. National Agency of Corruption Prevention, *Dynamics of Declaration: NAZK Updated the Data of the Counter of Voluntary Submission of Declarations*, 2023g, in <https://nazk.gov.ua/uk/novyny/dynamika-deklaruvannya-nazk-onovylo-dani-lichylnykadobrovilnogo-podannya-deklaratsij/>.
 32. National Agency of Corruption Prevention, *In Two Weeks, Officials Voluntarily Submitted 5,700 Declarations for 2021 and 2022*, 2023h, in <https://nazk.gov.ua/uk/novyny/za-dva-tyzhni-posadovtsi-dobrovilno-podaly-5-7-tys-deklaratsij-za-2021-ta-2022-roky/>.
 33. National Agency of Corruption Prevention, *The Dynamics of Declarations is Increasing: Last Week, Officials Submitted 5,900 Declarations for 2021 and 2022*, 2023i, in <https://nazk.gov.ua/uk/novyny/dynamika-deklaruvannya-zrostaye-za-mynulyj-tyzhden-posadovtsi-podaly-5-9-tys-deklaratsij-za-2021-ta-2022-roky/>.
 34. Verkhovna Rada of Ukraine, *Draft Law No. 8071 “On Amendments to Certain Laws of Ukraine in order to fulfill the requirements of the European Commission regarding Ukraine’s acquisition of the status of a member of the European Union”*, 2022, in <https://itd.rada.gov.ua/billInfo/Bills/Card/40543>.
 35. Verkhovna Rada of Ukraine, *Draft Law No. 8071 “On Amendments to Certain Laws of Ukraine in order to fulfill the requirements of the European Commission regarding Ukraine’s acquisition of the status of a member of the European Union”*, 2022, in <https://itd.rada.gov.ua/billInfo/Bills/Card/40543>.
 36. Law of Ukraine No. 2381-IX “On Amendments to the Law of Ukraine “On Prevention of Corruption” Regarding the Specifics of the Application of Legislation in the Field of Prevention of Corruption in Martial Law”, 2022, in <https://zakon.rada.gov.ua/laws/show/2381-20#Text>.
 37. Verkhovna Rada of Ukraine, *Draft Law No. 8071 “On Amendments to Certain Laws of Ukraine in order to fulfill the requirements of the European Commission regarding Ukraine’s acquisition of the status of a member of the European Union”*, 2022, in <https://itd.rada.gov.ua/billInfo/Bills/Card/40543>.
 38. S. Kivalov, (2023). *Public Administration in the Field of National Security: Updating Content during Martial Law*, in *Amazonia Investiga*, 12(65), 2023, pp. 68-76.
 39. A. Iatsyshyn, A. Iatsyshyn, V. Kovach, I. Zinovieva, V. Artemchuk, O. Popov, O. Cholyshkina, O. Radchenko, O. Radchenko, A. Turevych, *Application of Open and Specialized Geoinformation Systems for Computer Modelling Studying by Students and PhD Students*, in *CEUR Workshop Proceedings*, 2020, pp. 893-908.
 40. National Agency of Corruption Prevention, *Clarification Regarding the Application of Certain Provisions of the Law of Ukraine “On Prevention of Corruption” Regarding Financial Control Measures under Martial Law (Declaration Submission, Notification of Significant Changes in Property Status, Notification of Opening a Foreign Currency Account in a Non-Resident Bank Institution, Conducting Inspections)*, 2022a, in

- <https://nazk.gov.ua/uk/documents/roz-yasnennya-4-vid-07-03-2022-shhodo-zastosuvannya-okremyh-polozhen-zakonu-ukrayiny-pro-zapobigannya-koruptsiyi-stosovno-zahodiv-finansovogo-kontrolyu-v-umovah-voyennogo-stanu-podannya-deklaratsiyi-p/>.
41. National Agency of Corruption Prevention, *Clarification Regarding the Application of Certain Provisions of the Law of Ukraine “On Prevention of Corruption” Regarding Financial Control Measures under Martial Law (Declaration Submission, Notification of Significant Changes in Property Status, Notification of Opening a Foreign Currency Account in a Non-Resident Bank Institution, Conducting Inspections)*, 2022a, in <https://nazk.gov.ua/uk/documents/roz-yasnennya-4-vid-07-03-2022-shhodo-zastosuvannya-okremyh-polozhen-zakonu-ukrayiny-pro-zapobigannya-koruptsiyi-stosovno-zahodiv-finansovogo-kontrolyu-v-umovah-voyennogo-stanu-podannya-deklaratsiyi-p/>.
 42. Order of the Ministry of Justice of Ukraine No. 309 “On the Approval of the List of Territories on Which Hostilities are (were) Conducted or Temporarily Occupied by the Russian Federation”, 2022, in <https://zakon.rada.gov.ua/laws/show/z1668-22#Text>.
 43. Verkhovna Rada of Ukraine, *Draft Law No. 9534 of the President of Ukraine to the Law on Amendments to Certain Laws of Ukraine on Determining the Procedure for Submission of Declarations by Persons Authorized to Perform State or Local Self-Government Functions in Martial Law*, 2023, in <https://itd.rada.gov.ua/billInfo/Bills/Card/42379>.
 44. National Agency of Corruption Prevention, *NAZK Welcomes the Adoption of the Draft Law on the Restoration of E-Declaration in the First Reading, but Warns against Certain Risks*, 2023a, in <https://nazk.gov.ua/uk/novyny/nazk-vitaye-uhvalennya-zakonoproektu-shhodo-vidnovlennya-e-deklaruvannya-u-pershomu-chytanni-prote-zasterigaye-vid-pevnyh-ryzykiv/>.
 45. Law of Ukraine No. 2381-IX “On Amendments to the Law of Ukraine “On Prevention of Corruption” Regarding the Specifics of the Application of Legislation in the Field of Prevention of Corruption in Martial Law”, 2022, in <https://zakon.rada.gov.ua/laws/show/2381-20#Text>.