



NATIONAL AGENCY
ON CORRUPTION
PREVENTION

ANTI-CORRUPTION INTEGRITY 2020

KYIV - 2021

ABOUT THE STUDY

Anti-Corruption Integrity Survey — 2020 is a study initiated and organized by the National Agency for Corruption Prevention (“NACP”) to assess the status of integrity within government agencies and state-owned enterprises, identify conditions that they have created for anti-corruption effort, explore the real status of independence of anti-corruption officers in the fulfillment of their tasks, identify their needs and areas of activity that need high-quality methodological guidelines and advice from NACP.

RESPONDENTS

1. Anti-corruption officers, including:

- ✓ **officers of government agencies (“officers”);**
- ✓ **officers of state-owned enterprises (“SOE officers”).**

2. Civil servants.

ANALYSIS INCLUDED RESPONSES OF

1 095 officers

543 SOE officers

35 307 civil servants

METHODOLOGY

Data was collected through an anonymous online survey where respondents were asked to complete a standardized questionnaire for each target group of the study.

Data was analyzed by quantitative methods using the SPSS application.

NOTE.

When answering questions marked with the asterisk «*», respondents could choose several answers.

I

STATUS OF INTEGRITY IN PUBLIC SECTOR ORGANIZATIONS

1.

Over

90%
of respondents

Staff and management are equally responsible for the degree of integrity at government agencies and state-owned enterprises



Alternative points of view:

5% superior government agencies

3% anti-corruption agencies

2.

74%
of respondents

Staff's personal integrity is the key factor driving corruption down in government agencies and state-owned enterprises

12%
of respondents

The fear of being charged has the least impact on corruption

Other factors brought up by the respondents:

54% transparency of management decisions

48% competitive pay



3. The vast majority of respondents



note that the management of a government agency or state-owned enterprise regularly stresses the need for combating corruption, and this policy is supported with real action

However, about **20%** of respondents



report the management's lack of interest in or even ignorance of anti-corruption, and more than a third of civil servants recognize or admit being pressured by their management



Civil servants	6,7	81,1	8,7	3,5
SOE officers	5,4	78,2	13,5	2,9
Officers	6,2	79,2	12,6	2,0

- management regularly stresses the need for combating corruption, and this policy is supported with real action
- management stresses intolerance to corruption, but does nothing beyond mere statements
- management disregards the importance of preventing corruption
- corruption is rooted in the government agency or state-owned enterprise, and nobody fights it

4. More than **40%** of civil servants

are unaware of a system of local anti-corruption policies existing at government agencies



- 30%** Aware of the procedure available in the government agency for resolving a conflict of interest
- 35%** Aware of the procedure available in the government agency for reviewing reports of corruption
- 10%** Aware of incentives for corruption whistleblowers
- 27%** Aware of the existing rules of ethics or code of integrity
- 38%** Not aware of existing regulations on building integrity
- 4%** None

5.

About **80%**
of respondents



are unaware of violations of anti-corruption laws
in the activities of state institutions

At the same time,
almost

30%
of respondents



refer to a variety of violations ignored at the
government agency / state-owned enterprise

- ✓ a conflict of interest;
- ✓ illegal gifts;
- ✓ close persons working together;
- ✓ concurrent jobs in civil service.

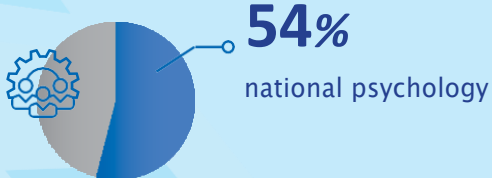
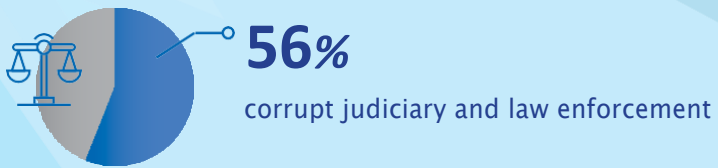


«I think it would be reasonable, for a start, to set priorities and focus efforts on combating corruption among the top leadership of civil servants. I am convinced that, if the leader of a team has a committed position, there will be no room for corruption in their team, and staff who do not agree to work fairly will be forced to leave the team»

(a respondent out of SOE officers)

II CULTURE OF EXPOSING CORRUPTION IN THE AGENCY

1. The main factors that respondents believe prevent the whistleblower system



2.

More than

50%

of civil servants



are prepared to report violations of anti-corruption laws to their manager or another (honest) leader of the agency

However, about

20%

of respondents



are prepared to ignore their leaders' corrupt practices

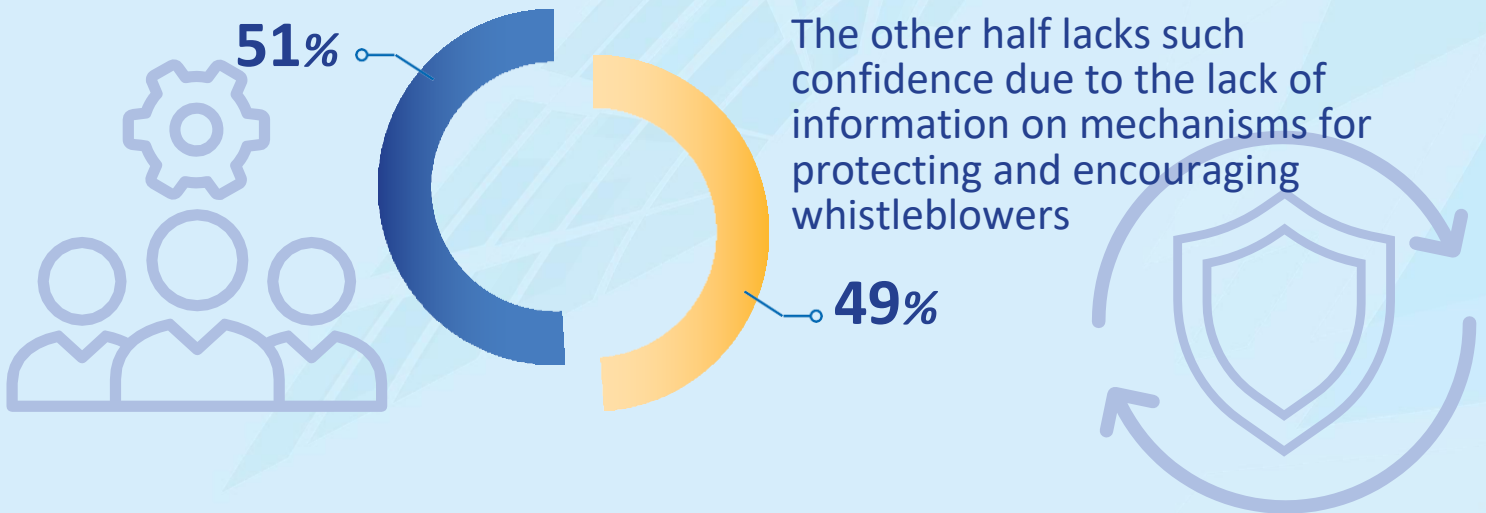


Other civil servants will report

25% to the anti-corruption officer

10% to other specially authorized anti-corruption entities

3. Only half of the respondents agree that whistleblower protection contributes to the integrity of their government agency or state-owned enterprise





4. Almost half of the respondents

38%

are convinced that the exposing of corruption will have negative consequences for the whistleblower, who will suffer various types of pressure at work, including dismissal

More than 50%
of the respondents

are not prepared to expose corruption, thinking that the legal protection of whistleblowers is not strong enough



«In Ukraine, exposing corruption is not popular. On the contrary, is rather condemned. The focus should be on creating a higher-quality platform for sharing the experience of whistleblower protection internationally»

(a respondent out of officers)

III

ANTI-CORRUPTION OFFICER

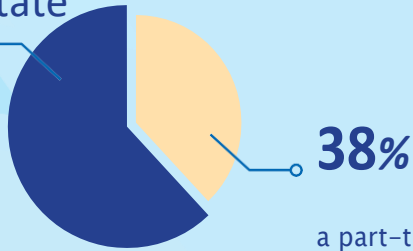
1.

officers in government agencies and nearly half that at state

at state-owned enterprises

62%

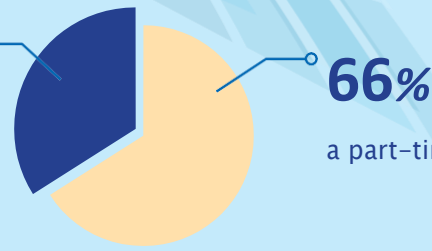
Hold full-time positions



34%

Hold full-time positions

a part-time basis



a part-time basis

Conclusion:

at state-owned enterprises, there is almost half the number of full-time officers at government agencies.



2. About half of the officers have been in office for less than 1 year

The remaining interviewed officers have more than 2 years of anti-corruption experience



43%

have served for less than 1 year



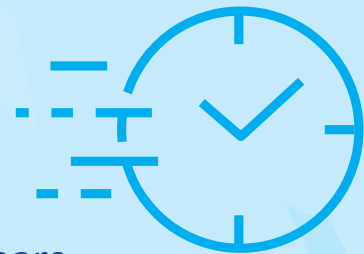
34%

have served for 2–3 years

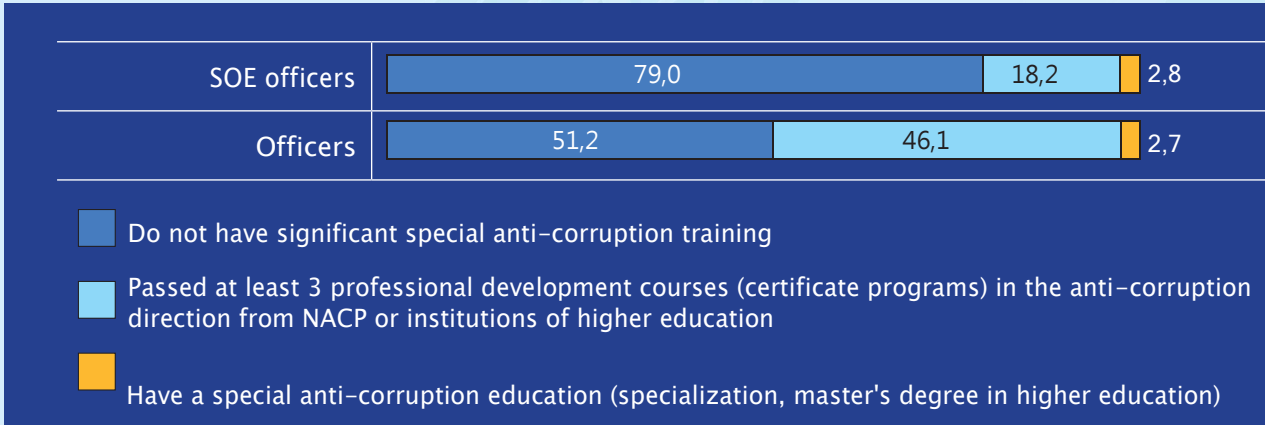


23%

have served for 4 years or more



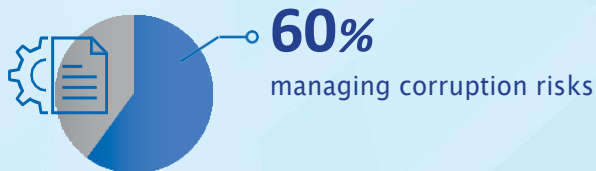
3. Officers admit to having poor professional training, where half of the officers and **79%** of the SOE officers have no special anti-corruption training



4. Every tenth officer does not understand their role in corruption risk management and finds their work a waste of time



The understanding of their role by officers varies:



5.

Only **40%**
of the officers

consider themselves able to fulfill statutory anti-corruption tasks in full

And every tenth

10%

states their inability due to the lack of working time allocated for anti-corruption and the lack of practical experience



«An effective anti-corruption policy at an organization involves ongoing monitoring of anti-corruption activities. To this end, a separate position of the anti-corruption officer must be created in the staff schedule of each government agency (of course, with appropriate pay). The officer's performance depends on their workload: if the officer combines service with other activities, performance indicators are nothing worth talking about if not even 50%, but 30 percent of work is only done»

(a respondent out of officers)

6.

Although

70%
of civil servants

are more or less aware of the activities of officers

a large share

21%

are unaware that an officer serves in their government agency

of civil servants

7. Collaboration of officers and management is very poor

Less than half of the officers actively initiate anti-corruption effort to their leaders:

45% of officers

39% of SOE officers

59%

Management supports the proposals of officers, in full or in part, in 59% of cases

8. Guarantees of officer independence are poor

Officers are much more dependent on their leaders than SOE officers

Are officers authorized to independently sign corruption reports to specially authorized anti-corruption entities?

SOE officers	45	36	19
Officers	68	18	14

■ No, they are not. They draft documents to signed by the director
■ Yes, they are ■ Yes, they are, but after a consultation with the director

9. A committed response to all facts of corruption in most cases

57%

will create negative consequences for officers (psychological pressure by management, team, potential disciplinary action, up to dismissal)

Only in

34%
of cases

a committed position of the officer will be encouraged by their leaders



10. Described key steps that can strengthen the role of officers



55% ▷

Greater financial support



44% ▷

subordination to NACP

Other steps may include



33%

having NACP approve officer appointments and dismissals

26%

creating a self-regulatory organization

11. What officers need from NACP most of all is



77% ▷

clear and effective methodological guidelines



75% ▷

real-time advice

Other expectations from NACP

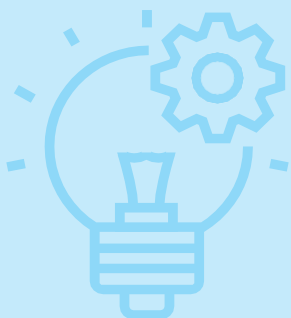


23%

making officers' positive performance known in this professional community

21%

protecting against pressures by the management of the government agency/state-owned enterprise





«Regarding NACP activities, the creation of a specialized forum where we can discuss issues that arise, share experience, and get advice from staff. A bit clearer explanations, regular online training or courses on issues of concern. Empowering officers to carry out preliminary control over information specified in declarations (access to registers) and, in the event of discrepancies or inconsistencies, to forward them for a detailed audit to NACP»

(a respondent out of officers)

12. What officers need the most is

42%

additional knowledge on preventing, identifying, and resolving a conflict of interest, assessing corruption risks, drafting anti-corruption programs



38%

conducting official investigations



Other matters on which the officers need additional knowledge the most



37% implementing financial control

36% holding an anti-corruption proofing

34% cooperating with whistleblowers, protecting whistleblower rights

29% checking counterparties

26% reviewing corruption reports

23% organizing internal channels for corruption reporting

RECOMMENDATIONS

To the National Agency for Corruption Prevention in cooperation with public and nonprofit sector partners

- 1** Draft and implement a curriculum on the anti-corruption role of directors of state-owned organizations.
- 2** Recommend ways of implementing anti-corruption compliance in juridical persons.
- 3** Raise civil servants' awareness of scenarios of due reporting of potential corruption or corruption-related offenses.
- 4** Create a single whistleblower portal that maintains whistleblower anonymity and confidentiality.
- 5** Provide government agencies/state-owned enterprises with comprehensive methodological guidelines and clarifications on whistleblower protection, and whistleblowers with materials on their rights to and options of protection.
- 6** Enhance professional competencies of anti-corruption officers.
- 7** Diversify ways of building professional knowledge about officers.
- 8** Identify, and think through activities to address, reasons preventing officers from submitting their own corruption reports signed by them to specially authorized anti-corruption entities.
- 9** Reinforce independence guarantees, improve the funding and status of officers that act legally and are committed in their response to every corruption report.

To directors of government agencies/state-owned enterprises

- 1** Devise a set of anti-corruption principles and policies, centrally and locally, regarding intolerance of corruption, inevitability of punishment and equality of responsibility for unfair practices, whistleblower protection and encouragement.
- 2** Take a "top down approach" by showing a personal example of ethical conduct to help subordinates develop zero tolerance for corruption.
- 3** Review and make management decision-making processes transparent. Improve the quality of work processes.
- 4** Create and maintain internal and regular channels for reporting potential corruption or corruption-related offenses, other violations at government agencies / state-owned enterprises in accordance with the Law of Ukraine On the Prevention of Corruption.
- 5** Facilitate the unconditional observance of whistleblower legal rights and protection guarantees.
- 6** Create and maintain authorized units or introduce a separate staff position of an officer at state-owned enterprises within their jurisdiction.
- 7** Comply with compulsory requirements of the minimum number of authorized units and fill existing officer vacancies.
- 8** Develop the professional competency of staff of authorized units (officers).
- 9** Ensure compliance with the guarantees of independence of the authorized unit (officer), including the requirements for subordination and accountability of authorized units (officers) to the directors of state-owned organizations.
- 10** Make sure that the authorized unit (officer) of the government agency/state-owned enterprise may exercise their authority by independently sending reports of corruption signed by them to the specially authorized anti-corruption entities.

To officers of government agencies/state-owned enterprises

- 1** Develop and, after approval, make internal policies (acts) of government agencies and state-owned enterprises on preventing corruption and building a culture of integrity available to staff.
- 2** Conduct a high-quality assessment of corruption risks existing for the government agency or state-owned enterprise and create an anti-corruption program (another document on corruption risk management).
- 3** More actively provide methodological guidelines and advice to employees and persons serving, getting trained, or doing certain work at the government agency / state-owned enterprise regarding the benefits of and procedures for reporting potential corruption or corruption-related offenses, other violations of the Law of Ukraine On the Prevention of Corruption, and the protection of whistleblower rights. Deliver internal training on these matters.
- 4** Hold regular anti-corruption training for officers of territorial (interregional) bodies or state-owned enterprises within their jurisdiction.

This study was supported by the National Agency of Ukraine for Civil Service and the Center for Integrity in the Defense Sector of the Norwegian Ministry of Defense (CIDS).

Scientists of the Department of Monitoring Research of Socio-Economic Transformations of State Institution "Institute of Economics and Forecasting of the National Academy of Sciences of Ukraine" were engaged organizing and supporting the online survey and data analysis.

The study was held for the first time and is expected to be held annually.

The study findings will be useful for directors of government agencies or state-owned, any-corruption officers, anti-corruption experts, the nonprofit sector.