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Subject line “Resolution 10/4 – Measuring corruption”

Annex I

Part 1 – National experiences with assessing the effectiveness of anti-corruption frameworks

1. Does your country have any mechanisms in place to assess the effectiveness of its legislative and/or institutional anti-corruption framework? Please briefly summarize the methodology, scope and frequency of the process as well as any specific tools your country uses.

Ukraine's anti-corruption policy is defined in comprehensive programme documents, such as the Anti-Corruption Strategy and the State Anti-Corruption Programme for the implementation of the Anti-Corruption Strategy. Currently, Ukraine has an Anti-Corruption Strategy for 2021-2025 (hereinafter – the Strategy) and a State Anti-Corruption Programme for 2023-2025 (hereinafter – the Programme).

To properly track the progress of these policy documents, the National Agency on Corruption Prevention (the NACP) has developed a mechanism for monitoring and evaluating the effectiveness of their implementation. The legal basis for this mechanism is laid down in the Law of Ukraine “On Prevention of Corruption”, the Strategy and the Programme, and the procedure for monitoring and evaluation of effectiveness is approved by the NACP order.

The monitoring procedure focuses on determining the status of implementation of individual activities under the Programme by obtaining relevant information from the implementers of these activities or from publicly available sources. It is carried out on a quarterly basis. The key monitoring tool is the Information System for Monitoring the Implementation of State Anti-Corruption Policy (hereinafter – the ISM SACP)¹. The ISM SACP consists of a closed part, which serves as a communication tool between the NACP and all implementers of the Programme activities, and an open part, which is a publicly available information resource containing data on all problems, expected strategic results and measures envisaged by the Strategy and the Programme, as well as data on the status of implementation of all the Programme activities.

Evaluation of the Strategy and the Programme implementation efficiency is divided into current and overall. The current evaluation involves determining the total quantitative and qualitative impact of the Programme activities on the status and dynamics of achieving each expected strategic result, which are set out in the Strategy. The overall evaluation will be carried out after the expiration of the Strategy and the Programme, in particular, by assessing the extent to which the problems identified in the Strategy have been solved by achieving the relevant expected strategic results. This evaluation will be based on the results of monitoring the implementation of the Programme activities, analysis of sociological and analytical studies on the state of corruption, as well as statistical observations and analysis of the practice of applying anti-corruption legislation.

¹ The ISM SACP is available at the following link: <https://dap.nazk.gov.ua/en/>

The results of the overall assessment of the effectiveness of the Strategy and the Programme implementation will be reflected in the national report on the effectiveness of the state anti-corruption policy implementation (hereinafter - the national report), which is also the responsibility of the NACP. In addition, the national report will also contain:

- a generalised analysis of the situation with corruption and the impact of the measures taken on the level of corruption (based on statistical data and the results of sociological surveys);
- information on the results of implementation of unscheduled measures to prevent and combat corruption, including in the framework of international cooperation;
- conclusions and recommendations, including those on the validity period and directions of the Strategy for the new period.

Thus, the national report is a tool to summarise all anti-corruption reforms, both regulatory and institutional, that have been implemented in recent years and to assess the effectiveness of these reforms.

In addition, the Laws of Ukraine “On Prevention of Corruption”, “On the National Anti-Corruption Bureau of Ukraine” and “On the Prosecutor's Office” provide for procedures for independent performance evaluation of the key anti-corruption institutions, namely the NACP, the National Anti-Corruption Bureau of Ukraine (the NABU) and the Specialised Anti-Corruption Prosecutor's Office (the SAPO) respectively. These independent assessments are carried out by three-member commissions nominated by donors providing international technical assistance to Ukraine in the area of preventing and combating corruption.

However, each such independent evaluation procedure has its own peculiarities, depending on the body whose activities it is conducted. For example, the composition of the commissions that conduct the assessment of the NACP and NABU is approved by the Cabinet of Ministers of Ukraine, and the composition of the commission that conducts the assessment of the SAPO is approved by the Prosecutor General. The performance of the NACP and the SAPO is evaluated every two years, and the performance of the NABU is evaluated annually. The criteria and methodology for evaluating the performance of the NABU and the SAPO are approved by the commissions themselves, while the criteria and methodology for evaluating the performance of the NACP are approved by the Cabinet of Ministers of Ukraine.

2. Please describe the institutional setup for assessing the effectiveness of the anti-corruption framework. Which institutions are involved in the assessment? Is there a mechanism for interagency cooperation in assessing the effectiveness of the anti-corruption framework? Does your country engage with academia, civil society and the private sector throughout these processes?

The NACP is responsible for monitoring and evaluating the effectiveness of the Strategy and the Programme implementation, as well as preparing the national report. In performing these tasks, the NACP interacts with the implementers of the Programme activities and receives the necessary information from them.

In addition, the Law of Ukraine “On Prevention of Corruption” requires the prosecutor's office, the National Police of Ukraine, the NABU and other implementers of the Programme activities, within their powers, to submit annual statistical information on the results of their work to the

NACP. This statistical information is published in the ISM SACP² and will be used in the preparation of the national report.

In this context, it should also be noted that the NACP creates the most favourable conditions for involving civil society representatives in the process of monitoring and evaluation of the Strategy and the Programme implementation. Thus, the above-mentioned the ISM SACP contains all available information on the status of implementation of the Programme's³ activities. In addition, and most importantly, the ISM SACP provides for the possibility for any person to provide feedback on the implementation of a particular the Programme measure.

It is also worth mentioning that some indicators of achievement of the expected strategic results involve conducting expert surveys to assess the quality of implementation of the measures envisaged in the Strategy and the Programme. To conduct such surveys, the NACP selects experts in the relevant fields. In this way, the public is involved in assessing the effectiveness of the Strategy.

As for the independent assessment of the NACP, the NABU and the SAPO effectiveness, such assessment is carried out by the respective three-member commissions appointed by the Cabinet of Ministers of Ukraine and, in the case of the SAPO, by the Prosecutor General, based on proposals from donors providing international technical assistance to Ukraine in the field of preventing and combating corruption.

Independent performance evaluation of the NACP and the SAPO is conducted every two years, and of the NABU - annually. The first assessment of the NACP's performance was conducted in 2022-2023. The evaluation report is available on the NACP's official website⁴.

3. If your country uses indicators to assess the effectiveness of its anti-corruption framework, please describe the indicators as well as the data sources used.

The Strategy and the Programme primarily outline the problems to be solved, define the expected strategic results to be achieved in order to solve the problems, and provide for a system of measures that will allow achieving the expected strategic results.

All measures and expected strategic results envisaged in the Programme and the Strategy have their own performance and achievement indicators. Thus, the indicators of implementation of measures become a benchmark for the NACP analysts who carry out monitoring in determining whether a particular measure of the Programme has been implemented, and the indicators of achievement of the expected strategic results are used to assess the effectiveness of the Strategy and the Programme implementation.

In addition, the NACP annually conducts a standardised survey on the state of corruption in Ukraine. As a result of such surveys, the NACP receives relevant data, which is made public in the form of analytical reports published on the NACP⁵ website and will be reflected in the national report. The collected information will allow to assess the effectiveness of the state anti-corruption policy. The following indicators will be used for this assessment:

² Link to the relevant webpage (in Ukrainian): <https://dap.nazk.gov.ua/kpi/default/index/>

³ Link to the relevant webpage (in English): <https://dap.nazk.gov.ua/en/module/>

⁴ Available at the link (in English): <https://nazk.gov.ua/wp-content/uploads/2023/07/Report-of-the-Commission-for-Conducting-Independent-Assessment-of-the-Effectiveness-of-the-NACP.pdf>

⁵ The results of the research are available here (research materials for 2021-2023 are also available in English): <https://nazk.gov.ua/uk/doslidzhennya-korupsiyi/>

- share of the population with a negative attitude to corruption;
- share of the population (business representatives) who have had their own corruption experience;
- share of the population that is capable of being a corruption whistleblower;
- share of the population (business representatives) who approve of the activities of whistleblowers;
- the share of the population that is properly aware of the legal protection guarantees for whistleblowers.

These indicators are enshrined in the Methodology of the Standardised Corruption Survey in Ukraine, approved by the NACP⁶.

As for the independent assessment of the NACP, the NABU and the SAPO, the establishment of such an assessment requires the approval of criteria for its implementation. For example, the criteria for assessing the NACP's performance were approved by the Cabinet of Ministers of Ukraine. Thus, the criteria for ensuring the independence of the NACP and providing it with the necessary resources include, in particular, the stability of the legislation governing the NACP's activities; clear definition of the powers of the NACP by law and their proper delineation with the powers of other state bodies, etc. And the criteria for the NACP to formulate, coordinate and monitor anti-corruption policy are the approval of the Methodology of the standard survey on the level of corruption in Ukraine, which is relevant and does not cause substantiated significant comments; ensuring the annual assessment of the level of corruption in Ukraine, perception and trust in anti-corruption and other institutions, etc. and publication of its results, etc⁷.

4. Please summarize any findings of the effectiveness assessment. If several exercises have been conducted, have any trends been identified?

- **Monitoring and evaluation of the effectiveness of the Strategy and the Programme implementation.** The results of the monitoring are published in the ISM SACP on a quarterly basis. Up-to-date information on the status of implementation of a particular measure of the Programme can be found in the card of the relevant measure⁸. The results of the ongoing evaluation of the effectiveness of the Strategy and the Programme implementation will also be reflected in the ISM SACP.

The overall assessment of the effectiveness of the Strategy and the Programme will be carried out only after these documents are completed. This will be the first time that such an assessment will be carried out, as previous anti-corruption programme documents did not have a similar tool for evaluating the effectiveness of their implementation.

⁶ The methodology is available on the NACP's website here (in Ukrainian): <https://nazk.gov.ua/pdfjs/?file=/wp-content/uploads/Pages/10/0c/100cb803593173fc60cda666e895b8882418228a9719e584f4b57be704ab40321368832.pdf>

⁷ The full version of the criteria is available at the following link (in Ukrainian): <https://zakon.rada.gov.ua/laws/show/458-2020-%D0%BF#n10>

⁸ The ISM SACP is available at the link: <https://dap.nazk.gov.ua/en/module/>

The National Report, as provided for in the current Law of Ukraine “On Prevention of Corruption”, will also be prepared for the first time in the year of expiry of the Strategy and the Programme⁹.

- **Independent assessment of the effectiveness of anti-corruption institutions.** The mechanism for independent evaluation of the NACP's performance was provided for by law in 2019, with the first evaluation taking place in 2022-2023. The report on the results of the independent evaluation is published on the NACP website¹⁰.

Independent evaluations of the NABU and the SAPO are envisaged by law from 2021 and 2024 respectively and have not yet been conducted.

5. How does your institution or country use the results of the assessments to inform policy-making? Has your country amended its anti-corruption framework in response to the outcomes of the effectiveness assessments?

As noted above, monitoring and evaluation of the effectiveness of the Strategy and the Programme implementation, as well as preparation of the national report, is the responsibility of the NACP, the body authorised to formulate and implement anti-corruption policy. Monitoring and ongoing evaluation of the effectiveness of the Strategy and the Programme implementation allows the NACP to receive timely information on the current state of implementation of measures and achievement of expected strategic results. By analysing this information, the NACP may conclude that it is necessary to amend the Programme by adjusting the path to achieving the expected strategic results.

The conclusions drawn from the overall assessment of the effectiveness of the Strategy and the Programme implementation, reflected in the national report, will form the basis of the next Anti-Corruption Strategy.

The NACP also prepared the current the Strategy and the Programme based on an analysis of the current state of corruption in Ukraine. In developing these documents, the NACP used analytical and sociological studies, information on the results of the previous Anti-Corruption Strategy, the state of Ukraine's implementation of its international obligations, official reports of Ukrainian government agencies, and administrative and judicial statistics.

With regard to the independent assessment of the NACP's performance, the NACP has taken into account the results of the assessment, systematised the recommendations provided by the assessment, which can be implemented by the NACP within its competence, and approved the relevant list of recommendations by its order.

6. Which challenges has your country encountered in assessing the effectiveness of anti-corruption frameworks, and which steps have been taken to overcome them?

⁹ Until 2022, the national report was prepared annually by the NACP and was a general assessment of the state of corruption in Ukraine and the work of the anti-corruption system institutions. In 2022, the relevant regulations were changed.

¹⁰ Available at (in English): <https://nazk.gov.ua/wp-content/uploads/2023/07/Report-of-the-Commission-for-Conducting-Independent-Assessment-of-the-Effectiveness-of-the-NACP.pdf>

7. Which good practices could your country share regarding the measurement the effectiveness of anti-corruption frameworks that could benefit other States?

In order to ensure proper interaction between the NACP and the implementers of the Programme activities, publicity of monitoring and evaluation of the effectiveness of the Strategy and the Programme implementation, as well as to promote public involvement in this process, the NACP has developed and put into operation the ISM SACP.

The closed part of this system is a convenient platform for communication between the NACP and the implementers of the Programme activities. The open part of the system provides public access to information on the results of monitoring and evaluation of the Strategy and the Programme implementation. In addition, the functionality of the open part allows members of the public to leave their own feedback on the status of implementation of a particular the Programme measure. The ISM SACP is also available in English¹¹.

8. Has your country been guided by any international efforts aimed at improving or assessing the effectiveness of anti-corruption frameworks (e.g., peer review mechanisms, methodologies provided by international organizations)? If not, are there any tools or measures by international organizations that you would consider helpful in this regard (e.g., guidance on data collection, provision of tools, stronger focus on effectiveness in peer reviews)?

The NACP conducted a study on "Mechanisms for Monitoring Anti-Corruption Strategies and Plans of Foreign Countries", in particular, Croatia, the United Kingdom, Moldova, Albania, Lebanon, Lithuania, Estonia, Finland, Austria, Romania, Switzerland, South Africa, Armenia, Georgia, as well as studies on "Electronic Information Systems for Monitoring the Implementation of Public Policies in Ukraine and Foreign Countries", in particular by the UK, Sweden, Morocco, the IACC Monitor Platform, Switzerland, Canada, Australia, Estonia, the Open Government Partnership (OGP), and Vietnam. In these studies, the NACP analysed the experience of other countries in these aspects.

Based on the results of the study "Mechanisms for Monitoring Anti-Corruption Strategies and Plans of Foreign Countries", the NACP has formed conclusions that would be useful in developing a mechanism for monitoring and evaluating the effectiveness of anti-corruption programme documents:

1. The National Anti-Corruption Strategies (Action Plans for their implementation) contain relevant sections on monitoring and evaluation of such documents, which define

- the authorised body that monitors and evaluates the implementation of the relevant measures, tasks and objectives set out in the Action Plan and the Strategy;
- the frequency of monitoring and evaluation and, accordingly, the mechanisms and timing of collecting information from the implementers of the measures;
- mechanisms for evaluation and progress in the implementation of measures by the authorised body;

¹¹ The ISM SACP is available at the following link: <https://dap.nazk.gov.ua/en/>

- mechanisms for calculating the assessment of goal achievement (progress in achieving specific strategic goals, priorities of the strategy);
- deadlines for publishing monitoring and evaluation reports;
- mechanisms for involving representatives of non-governmental organisations and the expert community in the monitoring and evaluation processes.

2. Action plans for the implementation of the Strategy may have the following structure (generalised for a number of countries):

- Section - Priority (Area, Objective) - Task;
- Risks of implementing the task;
- Table of indicators for the implementation of measures.

The table of indicators may have the following indicators:

- activity;
- deadline for implementation;
- responsible institution (involved parties);
- expected result of the measure (indicator);
- baseline and target of the indicator;
- source of verification of the indicator achievement;
- source of funding (resources for implementation).

3. Indicators of the implementation of individual measures include both qualitative and quantitative indicators based on verified data that can be obtained at regular intervals.

4. As quantitative indicators of the implementation of certain measures (tasks, priorities), the following indicators are also used:

- data from official statistics of government agencies;
- data from periodic sociological surveys (of the population as a whole or of certain target groups, such as business) on the perception of corruption and corruption experience by certain thematic indicators;
- data from international ratings (indices) or their individual components in certain areas of assessing the corruption situation in the country, anti-corruption activities and the perception of corruption, which are researched (published) periodically.

The NACP also conducted a study on "Electronic Information Systems for Monitoring the Implementation of Public Policies in Ukraine and Foreign Countries".

Having analysed the experience of foreign countries, the positive elements of each system were identified, namely:

- 1) three levels of "immersion" (display) of information on implementation at the level of "goal - tasks - objectives" (including the transition to displaying information in the form of a table);
- 2) colour, graphic and textual differentiation of execution (completed, pending, in progress, overdue): chart in % + colour display of indicators;
- 3) displaying the progress of implementation in % at each level (goal - task - objective) - using the example of Morocco;
- 4) displaying the Goal (and/or Task) Card: Name, executor, deadline, number of tasks, % of completion, problem addressed by the goal, risks, indicators, actions taken, next steps, etc.

(example: Sweden, UK, Canada, Switzerland) - use of short and full versions of the card (with transition or expansion);

5) filtering by the implementation of measures: by purpose (area), authorities, etc. (example: Switzerland, IACC Monitor);

6) availability of additional information in a hidden window;

7) assessment of the impact of the measure (none, insignificant, moderate, transformational) - rating scale from 1 to 4;

8) display of "leaders" (by progress, % of implementation);

9) Ukrainian and English versions of the system;

10) a form for experts' comments on the implementation of measures - a separate window, possibly on the event card.

The above conclusions were taken into account when developing the mechanism for monitoring and evaluating the effectiveness of the implementation of the Strategy and Programme and the ISM SACP. A significant part of them has been implemented in practice.

9. Please insert any information you would like to add, such as descriptions of indicators or links to sources or reports.

Part 2 - National experiences with corruption measurement

A. Existing national or sub-national mechanisms to measure corruption and/or the effectiveness of anti-corruption frameworks

1. Does your country have any mechanisms in place to quantify or measure corruption? Please briefly summarize the methodology and scope (e.g. national, regional, sectoral) and frequency of the measurement process.

As mentioned above, the NACP annually conducts a national standardised survey on corruption in Ukraine. The NACP has approved the Methodology of the Standardised Corruption Survey in Ukraine¹² (hereinafter – the Methodology), which is periodically updated and improved.

According to the Methodology, this study consists of a survey of two groups of respondents with respective samples:

- a nationwide survey of the population;
- a national survey of business representatives.

The surveys are aimed at studying two main groups of indicators:

¹² The Methodology is available on the NACP website at the following link (in Ukrainian): <https://nazk.gov.ua/pdfjs/?file=/wp-content/uploads/Pages/10/0c/100cb803593173fc60cda666e895b8882418228a9719e584f4b57be704ab40321368832.pdf>

- indicators of corruption perception (perception of the prevalence of corruption in Ukraine in general and in certain areas, changes in the level of corruption over the past 12 months, assessment of the effectiveness of anti-corruption activities of state bodies, attitude to whistleblowers, intolerance of corruption, etc;)
- indicators of corruption experience both in general among respondents and in certain areas of public life and implementation of state policy (the survey of the population covers 11 areas, and the survey of business representatives covers 7, with three areas being surveyed in both groups of respondents).

As part of the study of corruption experience indicators, the NACP assesses the prevalence of certain corruption practices in certain areas.

In addition, under the Programme, the NACP is obliged to periodically conduct an expert survey to assess the level of corruption in Ukraine according to the approved the Methodology¹³. This survey provides for a periodic snapshot of anti-corruption experts' opinions on certain indicators of corruption perception and assessment of the state anti-corruption policy and is aimed primarily at identifying the areas with the highest level of corruption. The survey is scheduled to be conducted at least once every 2 years.

The respondents to the expert survey are representatives of the anti-corruption community who are sufficiently knowledgeable about the development and/or implementation of anti-corruption policy and can provide a sufficiently relevant assessment of the perception of the state of the situation with corruption in Ukraine, as well as the level (state) of corruption in the identified areas.

2. Please summarize any findings of the measurement exercises. If several exercises have been conducted, have any trends been identified?

The main purpose of the standardised survey on corruption in Ukraine is to collect data relevant to the indicators of the state anti-corruption policy. The Methodology defines the following indicators of the effectiveness of the state anti-corruption policy:

- share of the population with a negative attitude to corruption;
- share of the population (business representatives) who have had their own corruption experience;
- share of the population that is capable of being a corruption whistleblower;
- share of the population (business representatives) who approve of the activities of whistleblowers;
- share of the population who are properly aware of the guarantees of legal protection of whistleblowers.

In terms of these indicators, the following conclusions can be drawn from the results of the latest standardised survey conducted in December 2023:

- during 2017-2022, there was a gradual increase in the share of the population with a negative attitude to corruption: in 2017, the indicator was 43.3%, in 2021 this share reached almost half (49.4%), and in 2022 it significantly exceeded half of the population and amounted to 57.4%

¹³ The Methodology of expert survey to assess the level of corruption in Ukraine. Official website of the NACP: <https://dap.nazk.gov.ua/uploads/osr-13/zahid-1309/zahid-progress-4031/organ-148/566-3733485-661d2c6897000.pdf>

(plus 8 pp compared to 2021). In 2023, the indicator stabilised at 56.0% (the difference of 1.4 percentage points compared to 2022 is not statistically significant);

- in 2023, the share of anti-corruption-minded businesses stabilised after an increase in 2022 and amounted to 57.8% (the negative dynamics of minus 2.5 percentage points is not significant, and the 2023 figure is statistically significantly higher than in 2021);

- the share of the population that has had their own corruption experience (according to respondents' self-assessment of their involvement in corruption) has stabilised after a decline in 2022 and is 19.5% (the increase from 17.7% in 2022 is not statistically significant);

- however, there is a negative trend towards an increase in the share of businesses that have had corruption experience: in 2023, it was 22.2%, which is statistically higher than in 2022 (an increase of 6.8 percentage points); this indicator also exceeded the same indicator in the population for the first time in three years;

- the share of citizens ready to report corruption cases also remained at the level of 2022 after an increase and amounts to 10.2% among the population and 26.9% among businesses;

- the share of respondents who reported corruption to the competent authorities remains low, but continues to grow among the business audience (14.0% in 2023); among the population, there is virtually no dynamics in the period 2021-2023, and the share of such respondents ranges from 5.2% to 6.5% (for 2023);

- the share of people who approve of the activities of whistleblowers decreased in 2021, but increased in 2022 and continued to grow in 2023: the vast majority of the population (67.3%) and business (89.6%) approve of their activities;

- only 16.1% of the population could be considered to be adequately aware of the legal protection guarantees for whistleblowers in 2023, this figure remained at about the same level in 2021-2023.

The full version of the report and the presentation of the research findings are available on the NACP website¹⁴.

3. Which institutions are involved in the measurement efforts (e.g. Ministry/ies, Anti-Corruption Agency, Civil Service Commission, Ethics Commission, National Statistical Office, Supreme Audit Institution, procurement authority, tax authority, law enforcement authority)?

Is there a mechanism for interagency cooperation in measuring corruption?

The NACP organises standard and expert surveys on corruption in Ukraine. Other state authorities also conduct corruption surveys for their own needs, but these surveys are not conducted on a regular basis.

In addition, as mentioned above, the prosecutor's offices, the National Police of Ukraine, the NABU and other implementers of the Programme activities, within their respective mandates,

¹⁴ Link to the report (in English): <https://nazk.gov.ua/pdfjs/?file=/wp-content/uploads/Pages/c4/42/c442a4b445832042a4c85fe1ee63ac7687dfb4f5182466aab140dc2ec1db0a0c4606251.pdf>

Link to the presentation (in English): <https://nazk.gov.ua/pdfjs/?file=/wp-content/uploads/Pages/2e/b6/2eb6043eb74a9ce6b78fce15a8efbdee38553eeccb13bd5c8ed16e40906d8f46739825.pdf>

annually submit statistical information to the NACP on the results of their work. This information will also be used by the NACP in preparing the national report and analysing the level of corruption in the country.

4. Does your country engage with academia, civil society and the private sector in measuring corruption?

One of the main tools for determining the current state of corruption and the effectiveness of anti-corruption policy is a standardised survey on corruption in Ukraine. By its nature, this measure provides a snapshot of public opinion. Moreover, the survey itself is commissioned by the NACP and conducted by non-governmental sociological companies.

The aforementioned expert survey also involves representatives of the public. Thus, the respondents to this survey may include scientists, analysts and independent experts who study the phenomenon of corruption, as well as representatives of public associations, international organisations, donors, media, international experts, independent civil society activists who deal with the problem of corruption in Ukraine. The NACP also uses the resources of non-governmental sociological agencies to conduct expert surveys.

The NACP also uses the results of other sociological surveys. For example, such a study is the national survey “The State of Corruption in Ukraine. Perceptions, experiences, attitudes”¹⁵. This survey is based on a consistent methodology and has been conducted every two years since 2011 in Ukraine as part of the Enhancement of National Governance and Accountability through Engagement (ENGAGE) programme.

In addition, the NACP uses analytical studies prepared by civil society organisations such as the Centre of Policy and Legal Reform, Transparency International Ukraine, BRDO, etc. to determine various indicators of corruption in certain areas.

5. Which challenges has your country encountered in measuring corruption and which steps have been taken to overcome them? *E.g. Lack of resources, lack of methodological guidance, lack of technical capacity, lack of credibility of data, lack of legislation and procedures in place, multiplicity of data collection approaches, multiplicity of data sources and formats*

Until 2021, the issue of assessing the prevalence of corrupt practices in certain areas had not been thoroughly studied in Ukraine.

In 2021, the NACP issued an order approving the Methodology for a Standardised Corruption Survey in Ukraine, which allows not only to measure the respondents' corruption experience in a particular area as a whole based on their self-assessment, but also to study their level of involvement (victimisation) in corrupt practices in certain situations of contact between respondents and government officials, representatives of certain institutions, enterprises, and service providers. The Methodology also provides for an assessment of who initiated such corrupt interactions.

¹⁵ Results (in English): <https://engage.org.ua/eng/national-corruption-perceptions-and-experience-poll-2023/>
Interactive visualisation (in Ukrainian): <https://engage.org.ua/static/16-rokiv-korupsiyi-u-spryynyatti-ta-dosvidi-ukrayintsiv/>

At the same time, it remains problematic to measure the level of corruption in certain areas that cannot be covered by a standard corruption survey in Ukraine due to the low level of contact of respondents with this area. However, the NACP plans to continue to conduct separate sectoral surveys of relevant target groups, including within the framework of financial support from foreign donors for this purpose.

6. Which good practices could your country share regarding the measurement of corruption that could benefit other States?

B. Specific areas of corruption, indicators and sources

1. Which types of corruption does your country measure and which specific indicators does your country use to assess the level of corruption?

Please tick or describe the indicators your country uses to measure corruption

	Direct measures (e.g. prevalence of corruption collected through surveys)	Perception (among general population or selected groups collected through surveys)	Risk constraints (factors that deter corruption, e.g. use of e-governance)	Risks Opportunities (Factors that enable corruption; e.g. little oversight)	Legislative response (de jure; e.g. law in place)	(Criminal) Justice response (de facto; e.g. arrests, convictions for corruption offences)
Bribery						
Embezzlement/ misappropriation						
Money-laundering						
Illicit enrichment						
Abuse of functions						
Public hiring based on merit						
Independence and integrity of the judiciary						
Conflict of interes						
Management of Public finances						
Public procurement						
Candidature for and election to public office						
Preventive measures for the private sector						
Preventive						

measures for state-owned enterprises						
Training programmes						
Resources allocated to fight corruption						
Public reporting and access to information						
Protection of reporting persons						
Other:						

Please insert any information you would like to add, such as descriptions of indicators or links to sources or reports.

Unfortunately, the above table does not quite correspond to Ukraine's approach to measuring corruption. Therefore, we would like to provide you with a generalised answer to your question below.

Regarding the indicators used by the NACP to assess the level of corruption in Ukraine, the NACP uses all of the indicators listed in the table. On the one hand, the NACP uses a standardised survey to obtain information on the perception and prevalence of corruption in Ukraine, and on the other hand, when analysing the level of corruption and the prevalence of certain corrupt practices, the NACP takes into account and evaluates the factors that deter corruption, the factors that facilitate it, the regulatory framework in the relevant area, and the statistics of law enforcement agencies and courts.

With regard to the types of corruption that the NACP investigates, when formulating its anti-corruption policy, the NACP currently focuses its efforts on identifying problems in the anti-corruption system of Ukraine as a whole, as well as the most critical factors that contribute to the spread of corruption in the most priority areas of public life. This approach makes it possible, on the one hand, to improve the anti-corruption system as a whole, and, on the other hand, to eliminate the factors that contribute to the spread of corruption, thus making dozens of corrupt practices impossible.

To implement anti-corruption policy in this way, the NACP needs information not on the prevalence of types of corruption, but on the prevalence of corruption in the country as a whole, the prevalence of corruption in certain areas, the factors that cause corruption in these areas, and the shortcomings of the anti-corruption system in general.

The NACP obtains data on the prevalence of corruption in general and in certain areas through standard and expert surveys. The standard survey asks respondents to define corruption as:

- abuse of office by a public servant (civil servant or local government official) or employees of enterprises (organisations) to obtain a bribe (unlawful benefit);
- giving a bribe (unlawful benefit) to a public servant (civil servant or employee of local self-government bodies) or an official of enterprises (organisations) in order to persuade him/her to abuse his/her official powers.

Thus, corruption is always associated with unlawful gain, and this definition may include bribery, embezzlement/ misappropriation of property, illicit enrichment, abuse of power, etc.

The NACP identifies shortcomings in the anti-corruption system and factors contributing to the spread of corruption in certain areas based on the results of analytical studies, information from publicly available sources, statistics on the work of law enforcement agencies, court statistics, etc.

2. Which methods and data sources does your country use to measure corruption?

- Population surveys**
- Business surveys**
- Public official surveys**
- Administrative records**
- Procurement data
- Banking data
- Criminal justice records**
- Other:

C. Data collection and use

1. How does your country ensure the validity and integrity of the data collected on corruption?

The reliability of data on corruption is confirmed by the sources and methods used to obtain it. First and foremost, we are talking about sociological surveys, which by their nature are more likely to provide reliable information on the public perception of corruption and its prevalence in the country as a whole and in certain areas.

The NACP also often uses the results of analytical studies conducted by NGOs with a recognised in Ukraine level of expertise in a particular area.

In addition, the NACP uses data provided by other public authorities. Thus, as mentioned above, the prosecutor's offices, the National Police of Ukraine, the NABU and other implementers of the Programme activities, within their powers, annually submit statistical information on the results of their work to the NACP. If necessary, the NACP also accumulates data from state statistics and publicly available sources.

The completeness of the data on corruption obtained in Ukraine can be assessed by reviewing the results of sociological surveys¹⁶, statistical data collected from the authorities¹⁷, as well as the volume of research accumulated by the NACP, which is available on the official website of the NACP in the “Research Library” section¹⁸.

2. Are policies or mechanisms in place to

- Discuss and agree on data objectives, priorities and scope between relevant stakeholders
- Collect data to measure corruption systematically

¹⁶ The results of the research are available here (research materials for 2021-2023 are also available in English): <https://nazk.gov.ua/uk/doslidzhennya-koruptsiyi/>

¹⁷ Link to the relevant webpage (in Ukrainian): <https://dap.nazk.gov.ua/kpi/default/index/>

¹⁸ The research library is available here: <https://nazk.gov.ua/uk/doslidzhennya-koruptsiyi/?tab=51143>

- Collect data disaggregated by
 - Sex
 - Age
- Validate the accuracy and impartiality of the data collected to measure corruption
- Facilitate data sharing across institutions
- Integrate data from different sources
- Ensure easy access to data
- Release information on the measurement of corruption on regular basis (monthly, yearly)

3. Which technological tools or systems are employed by your country in the collection and analysis of relevant data?

The anti-corruption institutions and other state authorities of Ukraine use various specially developed software products to collect, analyse and disseminate data. In particular, the Ukrainian authorities use data obtained from such state electronic registers as the Unified State Register of Court Decisions¹⁹, the Unified State Register of Persons Who Committed Corruption or Corruption-Related Offences²⁰, the Unified State Register of Declarations of Persons Authorised to Perform State or Local Government Functions²¹, the Unified State Register of Political Parties' Reports on Property, Income, Expenses and Financial Liabilities²², etc.

In addition, to analyse and visualise certain statistical or sociological data, the NACP analysts use such a data analysis tool as Tableau Public²³.

4. How does your country utilize the data on corruption to inform policy-making and anti-corruption strategies?

As noted above, the NACP is the public authority in Ukraine responsible for collecting and analysing data on corruption. At the same time, the NACP is also the body directly responsible for the development and implementation of anti-corruption policy.

The process of developing the current the Strategy and the Programme is an excellent illustration of how the NACP uses corruption data in shaping Ukraine's anti-corruption policy. For example, to prepare the drafts of these documents, the NACP studied the severity of the problem of corruption in Ukraine based on sociological surveys on the assessment of corruption by the population, business representatives and foreign investors.

The NACP also studied the level of corruption in Ukraine based on the Corruption Perceptions Index, which is annually determined by the international non-governmental organisation Transparency International, sociological surveys on the corruption experience of the population and business in Ukraine, sociological surveys on the assessment of the most corrupt areas in the country by the population, business entities and experts.

The NACP also examined the results of the implementation of the previous Anti-Corruption Strategy for 2014-2017 and the State Programme for Implementation of the Anti-Corruption

¹⁹ Access by the link: <https://reyestr.court.gov.ua/>

²⁰ Access by the link: <https://corruptinfo.nazk.gov.ua/>

²¹ Access by the link: <https://public.nazk.gov.ua/>

²² Access by the link: <https://politdata.nazk.gov.ua/>

²³ Access by the link: <https://www.tableau.com/products/public>

Strategy. For this purpose, the NACP used analytical studies prepared by non-governmental experts.

In addition, the NACP analysed the state of fulfilment of Ukraine's international obligations in the field of anti-corruption policy development and implementation. For this purpose, it also used analytical materials prepared by non-governmental experts, as well as the results of studies conducted by international organisations and official reports on Ukraine's progress in implementing OECD and GRECO recommendations and EU requirements.

In addition, the NACP used data from state institutions, namely official reports of Ukrainian state authorities and administrative and judicial statistics.

5. Has your country participated in any international efforts or collaborations aimed at improving the measurement of corruption? If not, which efforts would you find helpful to inform your national measurement work?

When organising sociological surveys, the NACP attracts international technical assistance, if necessary. For example, in 2020-2022, standardised surveys on corruption in Ukraine commissioned by the NACP were made possible solely due to the financial support of EUACI.

The NACP representatives also participate in international events on corruption assessment whenever possible. For example, on 31.08.2023 - 01.09.2023, the Global Conference on Using Data to Improve Corruption Assessment, organised by the United Nations Office on Drugs and Crime and the International Anti-Corruption Academy in partnership with the Organisation for Economic Co-operation and Development and the World Bank, was held in Vienna, and was attended by NACP representatives. The event was aimed at creating a forum for sharing knowledge, experience and best practices in the field of corruption measurement, as well as laying the groundwork for future initiatives in the field of corruption measurement.

6. If your country does not currently measure corruption, can you indicate why? Would any international efforts, e.g., those by international organizations, be helpful to inform national efforts in this regard? Which tools, support or other measures would you consider helpful?

To assess the level of corruption, the NACP organises relevant sociological surveys. The NACP considers the following areas of international cooperation to be potentially useful for this area of its work:

- focusing data collection and analysis on the highest priority areas for combating corruption (where empirical evidence shows the greatest risks of corruption and the greatest damage from it);
- addressing the issue of interoperability between data registers in Ukraine (to ensure data accessibility and exchange);
- wide introduction of advanced technologies (information and communication technologies, mega-data analytics and artificial intelligence) for collecting and analysing corruption data;
- the use of any sources for corruption analysis, including those related to whistleblower reports, financial documents, large data sets, including social media, open sources (e.g., lifestyle monitoring of officials), should be based on objective methodologies.