

## MECHANISM FOR ENSURING THE IMPLEMENTATION OF ANTI-CORRUPTION POLICY AND ITS INDIVIDUAL ELEMENTS AS A CONDITION FOR UKRAINE'S EUROPEAN INTEGRATION

*The article is devoted to the issue of anti-corruption policy, which is an important component of the democratic system in Ukraine. The aim is to establish the essence of the mechanism for ensuring and implementing anti-corruption policy, which is detailed through the determination of individual components of this mechanism, in particular measures and methods for ensuring the implementation of anti-corruption policy, which will be further referred to as tools for ensuring the implementation of anti-corruption policy and principles for ensuring the implementation of anti-corruption policy. Methods: in carrying out this study, general and special methods of scientific knowledge were used. The method of comparative analysis was used to determine the qualitative characteristics of the mechanism for ensuring the implementation of anti-corruption policy. The method of analysis was used to determine the qualitative and quantitative characteristics that characterize the features of the allocation of structural elements of the mechanism for ensuring corruption. The formal-logical method was used to establish the characteristics and essence of individual structural elements of the mechanism for ensuring the implementation of anti-corruption policy.*

*Results and conclusions: as a result, it was established that in Ukraine there is an urgent need to adjust anti-corruption policy in such a way that its existing components are improved to the conditions of European integration. It is advisable to use a combined approach to structuring the mechanism for ensuring the implementation of anti-corruption policy and to isolate the following components: 1) methods of formal implementation of anti-corruption policy; 2) regulatory and legal regulation of ensuring the implementation of anti-corruption policy; 3) institutional support for the implementation of anti-corruption policy; 4) measures and methods for ensuring the implementation of anti-corruption policy, which will be further referred to as tools for ensuring the implementation of anti-corruption policy; 5) principles for ensuring the implementation of anti-corruption policy; 6) procedures for ensuring the implementation of anti-corruption policy. The term "instruments" is used as a generalizing one that combines measures and methods of ensuring the implementation of anti-corruption policy, which is justified by the following: 1) the use of the term "measures" in the anti-corruption sphere is associated with the designation of specific areas of influence on overcoming the specified negative phenomenon; 2) the term "method" is used to designate the exact manner in which the normatively established influence on a specific object subject to regulation is carried out; 3) the concept of "instruments" reflects the qualitative characteristics of both measures and methods of ensuring the implementation of anti-corruption policy in their dialectical relationship. It has been established that a measure as an element of an integral mechanism turns into a tool for ensuring the implementation of anti-corruption policy only after its implementation in a specifically defined: a) legal form, which is implemented through the adoption of regulatory legal acts; the adoption of administrative (individual) acts; the conclusion of administrative agreements; committing other legally significant actions; b) a non-legal form, which is implemented through the implementation of organizational actions; performing material and technical operations, holding meetings or consultations. An approach to interpreting the definition of the principles of anti-corruption policy in a broad sense is proposed by attributing to them both the general principles of the functioning of subjects of power, and taking into account special principles of preventing corruption.*

**Key words:** corruption, state policy, public interest, regulation, mechanism, principles, tools, anti-corruption component.

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**Introduction.** Currently, preventing corruption is a necessary and integral direction of activity of any democratic and legal state. Ukraine is no exception, which has chosen the course of joining the European Union and implementing the leading principles of a democratic system. At the same time, the process of adaptation and harmonization in the field of preventing corruption has acquired new features and forms. Anti-corruption policy is a socio-legal phenomenon that is subject to constant updating, which is due

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to the fact that corruption is one of the most significant threats to the development of Ukrainian society and all its subsystems (legal, public-political, public, economic-entrepreneurial, etc.), exerting a destructive influence on both the traditional foundations of social existence and significantly leveling the prospects for the country's development (often being the basis for nullifying many constructive initiatives, entire sectoral reforms – judicial, police, decentralization). The processes of formation and implementation of anti-corruption policy are influenced by a number of factors and factors of an objective nature that mediate the existing effectiveness of anti-corruption policy measures.

To establish the concept of “mechanism for ensuring the implementation of anti-corruption policy”, it is necessary to study the qualitative and substantive features of its components (“mechanism”, “ensuring”, “implementation”) both in the general legal sense and for the purposes of determining anti-corruption policy in the context of European integration.

The implementation of anti-corruption policy in the public sector is ensured through a set of social relations that arise when preventing, preventing and facilitating the detection of signs of corruption and violations of anti-corruption requirements, prohibitions, restrictions when performing state or local government functions. In turn, ensuring the implementation of anti-corruption policy is the activity of implementing the state program for implementing the anti-corruption strategy. Despite the relative stability of qualitative approaches to anti-corruption activities, the ways of committing corrupt acts continue to transform into new forms when using relevant corruption schemes, which requires a revision of the provisions of existing anti-corruption regulatory legal acts, the effect of which was calculated for a period that has already passed. The absence of an updated special regulatory legal act, the provisions of which would regulate the principles of modern state anti-corruption policy, may have a negative impact on ensuring the coherence and systematicity of anti-corruption activities of all state authorities and local self-government bodies.

**Literature review.** Certain principles of combating corruption have become the subject of scientific developments of many specialists in the field of public law, including: Beltyuka E. M., Vasylenko O. Yu., Grebenyuk V. V., Kravchuk M. V., Kolomoiets T. O., Kolpakov V. K., Novikov O. V., Panfilov O. E., Petrovska I. I., Khabarova T. V., Khavronyuk M. I., Khamkhodera O. P. In this context, further scientific research on the topic of forming and substantiating proper administrative and legal support for the implementation of anti-corruption policy in Ukraine plays an important role. In view of the above, state anti-corruption policy must correspond to today's realities and have an appropriate formal definition.

**The essence of the mechanism for ensuring and implementing anti-corruption policy.** For the purposes of this study, ensuring the implementation of anti-corruption policy will be considered from the position of its praxeological embodiment, rather than a static interpretation. The latter is indicated through the determination of the “mechanism for ensuring the implementation of state anti-corruption policy”. At present, there is no single definition of the mechanism for ensuring a certain legal phenomenon.

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For example, Z. D. Chuiko (2006: 85) stated that the term “ensuring” is interpreted as: activity to create reliable conditions for the implementation of something; guaranteeing something; protection, safeguarding a certain phenomenon. M. D. Savchenko (2000: 74) presents a thesis on the definition of the following elements as the basis of the mechanism of ensuring: legal principles, norms (legal guarantees), as well as the conditions and requirements of the activities of state authorities, local self-government bodies, their officials, citizens, which together ensure compliance, implementation and protection of a certain object. According to K. G. Volinka (2000: 65), the mechanism of ensuring includes protection and protection, which is provided for by law.

The mechanism of ensuring the implementation of anti-corruption policy is a highly organized system. Moreover, the system is characterized by the unity of elements that are in certain connections and relationships with each other, determine the essence of the object as a whole and relatively independent external phenomenon. The structure is considered as a certain composition of components (elements) of the object (Oliynyk, 1997: 11).

Thus, the mechanism for ensuring the implementation of anti-corruption policy is a qualitatively separate phenomenon of the legal system, which is a complex of interconnected elements that create appropriate legal and factual opportunities for the full implementation of a set of legal measures and means aimed at forming the necessary conditions and practical implementation of the directions of state activity in the field of corruption prevention.

Regarding the specific affiliation of the mechanism for ensuring the implementation of anti-corruption policy, it is a type of legal management mechanism. In general, depending on the direction, the following types of mechanisms can be distinguished: organizational, economic, structural, technical, legal, state, informational (Khvostina, 2015: 33).

The constituent elements of the mechanism for ensuring the implementation of anti-corruption policy are in close inextricable connection, are interdependent and interconnected, complement each other. Therefore, the entities that carry out the specified activity must have an established system of interaction (this includes any state bodies, local government bodies and entities that exercise public authority due to the need to comply with the principles of anti-corruption policy).

The identification of structural elements of the mechanism for ensuring the implementation of anti-corruption policy should be based on: a) determining a general approach to the structure of the mechanism of specific socio-legal phenomena; b) outlining the specifics of anti-corruption policy, which forms the qualitative characteristics of the structural elements of the mechanism.

In law, two approaches are distinguished to determining the formal elements of the mechanism of legal regulation. The first is broad, determined by a plurality of elements, in particular, legal norms, legal facts, legal relations, interpretation of legal norms, implementation of legal norms, legality; legal culture and legal awareness, lawful and unlawful behavior, legal responsibility. The second is narrow, which includes only some of the above elements, for example, legal norms, individual acts, legal relations, legal implementation and legality (Galunko, Kurylo, Koroyed, 2015: 212).

It is advisable to use a combined approach to structuring the mechanism for ensuring the implementation of anti-corruption policy and to isolate the following components: 1) methods of formal implementation of anti-corruption policy; 2) regulatory and legal regulation of ensuring the implementation of anti-corruption policy; 3) institutional support for the implementation of anti-corruption policy; 4) measures and methods of ensuring the implementation of anti-corruption policy, which will be further referred to as tools for ensuring the implementation of anti-corruption policy; 5) principles for ensuring the implementation of anti-corruption policy; 6) procedures for ensuring the implementation of anti-corruption policy. It should be noted that the elements of the mechanism for ensuring the implementation of anti-corruption policy are simultaneously integral characteristics of ensuring the implementation of anti-corruption policy as a whole. That is why the components of the mechanism under consideration are considered in different parts of the study.

**Principles as an element of the mechanism for ensuring and implementing anti-corruption policy.** The existence of numerous national and regional problems of combating corruption is associated with the impact of this phenomenon on the functioning of all levels of government and on a wide variety of spheres of public relations. The effectiveness of anti-corruption decisions made at the highest state level is leveled by their conscious blocking and neglect. At the same time, constant technological progress allows the tasks set for state authorities to be performed in a way that is relatively more effective and

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transparent. Corruption prevention is no exception. Accordingly, corruption prevention is an area that must be carried out constantly and in accordance with a previously established plan in compliance with uniform principles and ideas of implementation.

The concept of “principle” reflects the initial ideas that are the basis for creating or implementing something, the method of creating or implementing something. In general, principles are an intermediate link from law to the norms of ethics and morality in the activities of state bodies, an intermediate link that combines the social achievements of civilization with the practical implementation of the norm of law (Rabinovich, Khavronyuk: 2004). That is, the use of the category of “principles” in law is associated with the existing social order and law, ensuring a uniform formulation of legal norms and their impact on social relations.

The development of a national approach to the principles of ensuring the implementation of anti-corruption policy is a relevant provision of Art. 5 of the UN Convention against Corruption, according to which: “each State Party, in accordance with the fundamental principles of its legal system, shall develop and implement or conduct an effective coordinated policy against corruption, which promotes public participation and reflects the principles of the rule of law, good governance of public affairs and public property, honesty and integrity, transparency and accountability” (United Nations Convention against Corruption, 2003). That is, the substantive content of the principles of anti-corruption policy will depend on a set of nationally determined factors, but will have a single direction – the prevention of corruption.

For example, P. Dobrodumov (2007: 56), the fundamental principles of anti-corruption policy include: 1) the direction of anti-corruption policy and coordination of the activities of government bodies in its implementation; 2) a systematic analysis of corruption risks; 3) conducting anti-corruption expertise of projects and current regulatory legal acts; 4) combining efforts and ensuring effective interaction at the central and regional levels between executive authorities, their territorial divisions, other state authorities, local governments, enterprises, institutions and organizations, and citizens’ associations on the implementation of state anti-corruption policy; 5) implementing the experience of other countries and proposals of international organizations on anti-corruption policy, etc., into national legislation.

The features of the formation of anti-corruption policy are outlined in Art. 18 of the Law of Ukraine “On Prevention of Corruption” (2014). As can be seen from the latter, “the principles of state anti-corruption policy for the relevant period are determined by the Verkhovna Rada of Ukraine in the Anti-Corruption Strategy, which is approved by law. Thus, in 2022, the Anti-Corruption Strategy was adopted, which will be valid until 2025. The specified regulatory legal act contains the principles of anti-corruption policy, which include: 1) optimization of the functions of the state and local self-government; 2) digital transformation of the exercise of powers by state authorities and local self-government bodies, transparency of their activities and data disclosure; 3) creation of more convenient and legal ways to meet the needs of individuals and legal entities in contrast to existing corruption practices; 4) ensuring the inevitability of legal liability for corruption and corruption-related offenses; 5) the formation of public intolerance to corruption, the establishment of a culture of integrity and respect for the rule of law (On the principles of the state anti-corruption policy for 2021–2025, 2022).

Regarding the optimization of the functions of the state and local self-government, the indicated idea is based on the provisions of the “Strategy for the Reform of Public Administration of Ukraine for the period until 2021” and complies with the European Standards of Good Administration SIGMA “Principles of Public Administration” and defines the main requirements for the system of public administration bodies. In general, the principles of public administration are formulated on the basis of international standards and requirements, as well as good practices of EU member states and/or countries of the Organization for Economic Cooperation and Development (Strategy for the Reform of Public Administration of Ukraine for the period until 2021, 2016). The next principle – digital transformation of the exercise of powers by state authorities and local self-government bodies is initially based on digital transformation, the interpretation of which is absent. At the doctrinal level, it is determined that digital transformation mediates: a) the transformation, change of certain phenomena or processes from non-digital to digital format; b) the creation of certain phenomena or implementation of processes based on digital communications and media infrastructure (Maslova, 2021: 393).

The change in the principles of the exercise of powers of state authorities is additionally regulated by the provisions of the Resolution of the Cabinet of Ministers of Ukraine “Some Issues of Digital Development” (2019), which establishes that: the application of the principles of the state policy of digital



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development during the exercise of the rights and freedoms of citizens must be ensured by executive authorities in the process of preparing drafts of new regulatory legal acts or amending regulatory legal acts and the exercise of power through the use of digital technologies. In addition, the Government has developed methodological recommendations for compliance with the principles of the state policy of digital development, which: provide an interpretation of the categories of digitalization, such as: e-interaction, e-services, e-resources, modern technologies, digital ecosystem; the purpose and tasks of the state body in terms of compliance with the principles of digitalization are highlighted (so, the implementation of powers in accordance with “openness” is understood as the creation and modernization of e-resources as “digital by default”, recognizes the data belonging to it as open within the framework of the law, provides equal opportunities for open source software and demonstrates active and motivated implementation of open source software, etc.); recommended methods of exercising powers, which are a manifestation of digital development, etc. (On ensuring the implementation of some issues of digital development, 2019).

The principle of creating, in contrast to existing corruption practices, more convenient and legal ways to meet the needs of individuals and legal entities concerns a change in the interaction of citizens and subjects of power, which must be properly defined. The value of legal regulation is characterized by its positive significance for meeting the needs of the existence and development of a person. The indicated methods of satisfying the needs of individuals and legal entities are simultaneously supported by the presence of regulation at the level of the Laws of Ukraine “On Citizens’ Appeals” (1996) and “On Administrative Services” (2012).

Ensuring the inevitability of legal liability for corruption and corruption-related offenses will be manifested in bringing to: a) criminal, disciplinary and/or civil liability for committing corruption offenses; b) criminal, administrative, disciplinary and/or civil liability for committing offenses related to corruption (On Prevention of Corruption, 2014).

The principle of forming public intolerance to corruption, establishing a culture of integrity and respect for the rule of law is a stable basis for any activity aimed at preventing corruption. The success of its compliance depends, on the one hand, on the actions of persons subject to anti-corruption legislation, and on the other hand, on the public perception of both corruption and measures to prevent it. At the same time, it is obvious that there are a number of problems related to the activities of public authorities specially authorized to prevent and combat corruption. For example, there are no sufficient results of activities, coordinated actions in the implementation of basic anti-corruption measures, which, in turn, forms a negative attitude of the public towards specially authorized entities. Among the reasons for this situation, the absence of specially trained specialists who will implement anti-corruption policy, who are knowledgeable in the issues of preventing and combating corruption, have the appropriate qualifications and experience of activity is singled out. In addition, subjects of power in the field of corruption prevention began their activities without the appropriate staff.

One of the determining factors of the destructive impact of corruption and activities to eradicate it is the lack of interaction between specially authorized bodies, which should be regulated in current regulatory documents, at the same time, anti-corruption institutions duplicate each other’s activities, this concerns the preparation of administrative protocols, supervision of compliance with the law in terms of filling out declarations, as well as conflict of interest, etc. An additional problem is the lack of a system for assessing the effectiveness and efficiency of the activities of anti-corruption institutions (Parkhomenko-Kutsevil, 2019: 206).

It should be noted that the concepts of “principles of anti-corruption policy” and “principles of ensuring the implementation of anti-corruption policy” are not identical. What they have in common is that they are: the fundamental starting point for the existence of a certain phenomenon; a kind of transitional plane from law to norms of ethics and morality in the activities of authorized entities; ideas, theoretical regulatory and guiding provisions of a certain type of activity, which are specified in the content of legal norms and are objectively determined by the material conditions of the existence of society; provisions that determine the qualitative characteristics of activities to prevent corruption. However, the principles of anti-corruption policy will reflect the statics of the fundamental principles of preventing corruption, and the principles of ensuring its implementation – the praxeological component that embodies the activities of specifically defined entities that are authorized to ensure the implementation of anti-corruption policy. The qualitative and substantive characteristics of the principles of ensuring the implementation of anti-corruption policy are associated with those entities that carry out this type of activity. These are the subjects

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of ensuring the implementation of anti-corruption policy, which are endowed with: a) general competence (the Verkhovna Rada of Ukraine, the Cabinet of Ministers of Ukraine, the President of Ukraine, heads of state bodies) and b) special competence (the National Agency for the Prevention of Corruption, the National Council on Anti-Corruption Policy under the President of Ukraine, the Coordination Working Group on Anti-Corruption Policy). The subjects of ensuring the implementation of anti-corruption policy will have in common: 1) their classification as subjects of power; 2) their classification as subjects of public administration; 3) their inclusion in the institutional mechanism for preventing corruption.

As a result, when exercising their powers to ensure the implementation of anti-corruption policy, the subjects authorized to do so must adhere to the general principles of the functioning of public administration subjects and special principles, which are mediated by the existing features of anti-corruption policy.

The general principles that must be observed by the subjects of anti-corruption policy implementation include the principle of the rule of law and the principle of good governance, which are the basic principles that guide the subjects of public administration. At the same time, the principle of the rule of law is constitutional, because the provisions of Article 3 of the Fundamental Law stipulate that “a person, his life and health, safety and inviolability are recognized as the highest social value” (Constitution of Ukraine, 1996).

Let us consider some components of the determination of the principle of the rule of law in the activities of subjects of ensuring the implementation of anti-corruption policy. Thus, the principle of legality as an element of the principle of the rule of law consists in the obligation of subjects of power to strictly comply with the legislation of Ukraine when carrying out any actions, to act exclusively to the idea of “everything is prohibited except what is expressly permitted by law” (provisions of Articles 6 and 9 of the Constitution of Ukraine). For example, the Head of the National Agency for the Prevention of Corruption is obliged to act exclusively within the framework of the law when exercising the powers granted (On the Prevention of Corruption, 1996).

As for the principle of good governance, it includes: ensuring participation in decision-making, transparency and impartiality when making decisions, compliance with accountability. The formation of existing democratic states is carried out taking into account the recognition of the rule of law and the consolidation of the political activity of citizens as the basis for the development of a legal state. The aforementioned categories interact with each other, qualitatively improving the sphere of public administration, the achievements of which, under the influence of European integration and Euro-Atlantic processes, are expressed in the concept of “good governance” (European Strategy for Innovation and Good Governance at Local Level, 2007). That is, the concept of “good governance” encompasses the implementation of democratic, responsible, effective, transparent and accountable management of state and public affairs at both the national and local levels. The United Nations Development Program provides for nine principles of good governance, including: 1) participation in making public administrative decisions; 2) consensus in decision-making; 3) feedback; 4) effectiveness in implementing public policy; 5) responsibility of all participants in the process; 6) transparency; 7) equality; 8) rule of law; 9) strategic vision (Good governance as a universal value).

Of particular importance for the purposes of this study is the implementation of the principle of public participation in regulating public relations related to ensuring the implementation of anti-corruption policy by carrying out, for example, anti-corruption expertise or submitting reports on corruption.

Thus, the general principles that must be followed by the subjects of ensuring the implementation of anti-corruption policy are mediated by the status characteristics of these authorized subjects as subjects of public administration. As for the special principles, they are mediated by the specifics of activities to ensure the implementation of anti-corruption policy. It should be noted that a single list of these principles is not enshrined in a single regulatory legal act, and their observance is provided for by regulatory legal acts of different legal force and profile (On Prevention of Corruption, 2014; On the Principles of State Anti-Corruption Policy for 2021–2025, 2022).

Having analyzed the provisions of the relevant legislation in the field of corruption prevention, the special principles for ensuring the implementation of anti-corruption policy include: 1) the unconditional implementation of strategic results that constitute the content of a specific anti-corruption policy measure; 2) ensuring open 24-hour access through the official website of a specially authorized entity to available information on the status of the implementation of anti-corruption policy; 3) minimizing corruption risks in the activities of specially authorized entities; 4) developing archetypes of good faith of public servants, etc.

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In conclusion, we conclude that when exercising their powers to ensure the implementation of anti-corruption policy, the authorized entities must adhere to the general principles of the functioning of public administration entities and special principles, which are mediated by the existing features of anti-corruption policy. Although a single list of these principles is not enshrined in a single regulatory legal act, their observance is provided for by regulatory legal acts of different legal force and profile.

**Instruments for ensuring the implementation of anti-corruption policy.** Instruments are a fundamental element of the implementation of a single mechanism for ensuring the implementation of anti-corruption policy. Within the framework of this study, the term “instruments” is used as a generalizing one that combines measures and methods for ensuring the implementation of anti-corruption policy. This thesis is justified by the following.

Firstly, the use of the term “measures” in the anti-corruption sphere is associated with the designation of various specific areas of influence on overcoming the specified negative phenomenon. As rightly noted by V. V. Nonik (2019: 92), the effective implementation of the anti-corruption function of the state involves the comprehensive implementation of legislative, organizational-political and socio-economic measures aimed at establishing interaction with civil society structures and international cooperation, as well as preventive measures aimed at preventing corrupt actions of officials and improving the general culture of power relations in Ukrainian society.

There is a practice of using the concept of “measures” in national and international legislation regulating the anti-corruption sphere. This is, for example, the Inter-American Convention against Corruption (1996), which recommends that member states implement preventive measures against corruption. The Law of Ukraine “On Prevention of Corruption” (2014) refers to “measures for external and independent resolution of conflicts of interest” (Article 29), “Additional financial control measures” (Article 52), “Features of implementing financial control measures in relation to certain categories of persons” (Article 521), etc. Thus, the term “measure” is used to denote various methods and means in the anti-corruption sphere that are used to achieve the set goals. However, with regard to ensuring the implementation of anti-corruption policy, the law has not chosen a concept that would reflect the system and essence of the measures that can be applied for this purpose.

Secondly, the term “method” in law is used to denote the exact manner in which the normatively established influence on a specific object subject to regulation is carried out. In essence, the ways of regulating relations reveal the specifics of the methods of regulation and receive their special expression in the norms of law. Thus, ensuring the implementation of anti-corruption policy is possible through permissive practice in the form of: granting a person the right to his own active actions; imposing on a person the obligation of active behavior or the obligation to refrain from committing actions of a certain kind.

Thirdly, the use of the concept of “instruments” reflects the qualitative characteristics of both measures and methods of ensuring the implementation of anti-corruption policy in their dialectical relationship.

Thus, the concept of “instrument” reflects the fact of the implementation of executive and administrative activities by authorized entities in the manner and form specified by law. The approach to identifying as an element of the mechanism for ensuring the implementation of anti-corruption policy – instruments of such activities was chosen as the basis for this study. This term can be interpreted as a set of measures applied by authorized entities in the manner and form specified by law to ensure the implementation of anti-corruption policy.

The characteristics of the instruments for ensuring the implementation of anti-corruption policy are as follows: 1) qualitatively – this is a set of measures aimed at ensuring the implementation of anti-corruption policy; 2) they are objectified in legal and non-legal forms of exercising the powers of subjects of power. At the same time, only the consequences of applying the legal form will have legal significance; 3) they can be applied exclusively in the manner provided for by law; 4) they can be applied exclusively by those subjects provided for by law.

Analysis of anti-corruption legislation allows us to conclude that ensuring the implementation of anti-corruption policy is carried out through the following measures:

1) organizing research on the study of the situation regarding corruption (On Prevention of Corruption, 2014), including through the identification and assessment of corruption risks (On Approval of the Methodology for Assessing Corruption Risks in the Activities of Government Bodies, 2016; On Improving the Process of Managing Corruption Risks, 2021);

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2) monitoring and control over the implementation of legislative acts on ethical behavior, prevention and resolution of conflicts of interest (for example, through the analysis of data from anti-corruption registers: the Unified State Register of Declarations of Persons Authorized to Perform State or Local Self-Government Functions, the Unified State Register of Persons Who Have Committed Corruption or Corruption-Related Offenses, and the Unified State Register of Reporting by Political Parties on Property, Income, Expenses, and Financial Obligations) (Official website of the National Agency for the Prevention of Corruption);

3) development of the Anti-Corruption Strategy and the State Program for its Implementation, as well as the development of anti-corruption programs (On Prevention of Corruption, 2014);

4) conducting anti-corruption expertise;

5) development of draft Anti-Corruption Strategy and State Anti-Corruption Program for the Implementation of the Anti-Corruption Strategy; formation and implementation of anti-corruption policy, development of draft regulatory legal acts on these issues, etc. Each of the measures to ensure the implementation of anti-corruption policy can be applied by a specific entity. For example, the NACP is authorized to carry out the following measures: organizing research on the study of the situation with corruption; approval of anti-corruption programs of state bodies, authorities of the Autonomous Republic of Crimea, local self-government bodies, development of a standard anti-corruption program of a legal entity; the National Council on Anti-Corruption Policy under the President of Ukraine is authorized to carry out the following measures: analysis of national anti-corruption legislation and measures for its implementation; monitoring and analysis of the effectiveness of the implementation of the anti-corruption strategy, making proposals to improve the interaction of bodies responsible for its implementation; participation in the preparation for the submission by the President of Ukraine of draft laws in the field of prevention and counteraction to corruption, etc. (On Prevention of Corruption, 2014).

The measure becomes a tool for ensuring the implementation of anti-corruption policy after its implementation in a specifically defined: a) legal form, which is implemented through the adoption of regulatory legal acts; adoption of administrative (individual) acts; conclusion of administrative agreements; performance of other legally significant actions; b) non-legal form, which is implemented through the implementation of organizational actions; performance of material and technical operations, holding meetings or consultations (Yakovlev, 2016: 100).

Regarding the legal form of objectification of measures to ensure the implementation of anti-corruption policy, we would like to separately draw attention to the fact that the National Council on Anti-Corruption Policy under the President of Ukraine is the entity that is not authorized to apply the tools to ensure the implementation of anti-corruption policy that are covered by the legal form and have specific legal consequences. This is due to the fact that any decisions made within the competence of this body are of an interim nature and are submitted for consideration by the President of Ukraine in the form of proposals to improve the interaction of bodies responsible for its implementation; proposals for draft laws, drafts of other regulatory legal acts in the field of preventing and combating corruption; messages of the President of Ukraine to the people, annual and extraordinary messages to the Verkhovna Rada of Ukraine on the internal and external situation of Ukraine in terms of the implementation of anti-corruption policy, etc. Thus, the use of instruments to ensure the implementation of anti-corruption policy is primarily entrusted to the NACP. Such instruments include: adoption of regulatory legal acts, adoption of acts of individual action (including registration actions); conclusion of administrative agreements. In accordance with the provisions of paragraph 18 of Art. 4 of the Code of Administrative Procedure of Ukraine (2004), a regulatory legal act is an act of management of a subject of power, which establishes, changes, terminates (cancels) general rules for regulating similar relations, and which is designed for long-term and repeated application.

Regulatory legal acts of the NACP are adopted in the form of orders (in accordance with the provisions of Article 7 of the Law of Ukraine "On Prevention of Corruption") on issues within its competence and are mandatory for implementation as regulatory legal acts (On Prevention of Corruption, 2014). An example of regulatory legal acts of the NACP as instruments for ensuring the implementation of anti-corruption policy can be the orders: "On Approval of the Form of Declaration of a Person Authorized to Perform State or Local Self-Government Functions, and the Procedure for Filling Out and Submitting a Declaration of a Person Authorized to Perform State or Local Self-Government Functions" (2021); "Regulations on the Department of Educational Work and Educational Programs" (2020); "On Conducting



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Integrity Checks and Monitoring the Lifestyle of Employees of the National Agency for the Prevention of Corruption” (2020); “Procedure for the Formation, Maintenance and Publication (Provision) of Information of the Unified State Register of Declarations of Persons Authorized to Perform State or Local Self-Government Functions” (2021), etc.

As for administrative acts, at the legislative level, they mean decisions or legally significant actions of an individual nature that are adopted or committed by an administrative body to resolve a specific case and are aimed at acquiring, changing, terminating or exercising the rights or obligations of individual persons. The possibility of adopting administrative acts in electronic form is not an exception. Administrative acts of the NACP as instruments for ensuring the implementation of anti-corruption policy can be adopted as a result of the approval of the anti-corruption program of a specific state body, a body of power of the Autonomous Republic of Crimea, a local self-government body. Also, a type of administrative acts of the NACP will be the provision of conclusions on the presence or absence of a conflict of interest in the activities of certain persons authorized to perform state or local self-government functions, and persons equated to them, the application of other provisions of anti-corruption legislation.

Actions as administrative acts include those aimed at changing the legal position, changing existing legal relations. An example in the context of the NACP’s activities would be maintaining the Unified Portal of Whistleblower Reports, the Unified State Register of Declarations of Persons Authorized to Perform State or Local Self-Government Functions, and the Unified State Register of Persons Who Have Committed Corruption or Corruption-Related Offenses. Administration of registers in this case would be a legally significant action consisting in officially recording facts or individual issues that have legal significance.

Regarding administrative agreements as a tool for ensuring the implementation of anti-corruption policy, we note the following. The features inherent in administrative agreements that can be concluded as a tool for ensuring the implementation of anti-corruption policy include: 1) one of the mandatory parties must be the NACP; 2) there is a consensus of the parties – an administrative agreement can be concluded only if there is an agreement on all its substantive components regarding the implementation of anti-corruption policy; 3) the conclusion of an administrative agreement is carried out in the form of a contract, agreement, protocol, memorandum, which is its external characteristic; 4) the content of the administrative agreement is the mutual rights and obligations of its parties in the public legal sphere, related in one way or another to the prevention of corruption; 5) it is concluded on the basis of the provisions of special anti-corruption legislation, while the detailing of individual aspects provides for subordinate legislation (for example, issues of form, content or procedure).

Non-legal forms of activity of authorized entities do not have legal consequences. A manifestation of the implementation of measures to ensure the implementation of anti-corruption policy, expressed in a non-legal form, are: holding meetings, conferences, assemblies, discussions of the NACP, including the possibility of remote participation (online) in the video conference mode; implementation by the NACP of coordination, methodological support and analysis of the effectiveness of the activities of authorized units (authorized persons) on the prevention and detection of corruption; informing the NACP of the public about the measures taken to prevent corruption, implementing measures aimed at forming a negative attitude towards corruption in the minds of citizens; involving the NACP of the public in the formation, implementation and monitoring of anti-corruption policy (On Prevention of Corruption, 2014).

As for material and technical operations, they can include office work, statistical, reference, information technology and other operations. In general, it is material and technical operations as an expression of a non-legal form that are the most voluminous part of the activities of subjects of power. Thus, the National Council on Anti-Corruption Policy under the President of Ukraine carries out an analysis of national anti-corruption legislation, and the NACP analyzes: the effectiveness of the activities of authorized units (authorized persons) on the prevention and detection of corruption; the state of prevention and counteraction to corruption in Ukraine, the activities of state bodies, authorities of the Autonomous Republic of Crimea and local self-government bodies in the field of prevention and counteraction to corruption; statistical data, research results and other information regarding the situation with corruption.

Therefore, ensuring the implementation of anti-corruption policy is based on existing tools that can be used by authorized entities in the manner and through measures specified by law.

**Conclusions.** In conclusion, we conclude that in order to establish the concept of “mechanism for ensuring the implementation of anti-corruption policy”, the qualitative and substantive features of the concepts that

form it (“mechanism”, “ensuring”, “implementation”) were investigated both in the general legal sense and for the purposes of determining anti-corruption policy. The concept of “ensuring the implementation of anti-corruption policy” was defined and the following features were identified: 1) it is substantively formed from a set of legal measures and means that must correspond to the state of social relations, the conditions of integration into the European Union; 2) it is qualitatively a system of guarantees aimed at creating effective conditions and practical implementation of the directions of state activity in the field of preventing and combating corruption; 3) it acquires legally significant consequences only in the case when its substantive components are regulated by legal norms (mainly by norms of administrative law, which is mediated by the specifics of preventing corruption).

The content of the principles of anti-corruption policy will depend on a set of nationally determined factors, but will have a single direction – preventing corruption. Attention is paid to the correlation of the concepts of “principles of anti-corruption policy” and “principles of ensuring anti-corruption policy”. It is proven that the qualitative and substantive characteristics of the principles of ensuring the implementation of anti-corruption policy are associated with those entities that carry out this type of activity.

The term “tools” is used as a generalizing one and one that combines measures and methods of ensuring the implementation of anti-corruption policy, which is justified by the following: 1) the use of the term “measures” in the anti-corruption sphere is associated with the designation of specific areas of influence on overcoming the specified negative phenomenon; 2) the term “method” – is used to indicate the exact manner in which the normatively established influence on a specific object that is subject to regulation is carried out; 3) the concept of “tools” reflects the qualitative characteristics of both measures and methods of ensuring the implementation of anti-corruption policy in their dialectical relationship.

### References:

1. Chuyko, Z. D. (2006). Konstytutsiino-pravovyi mekhanizm zabezpechennia natsionalnoi bezpeky Ukrainy [Constitutional and legal mechanism for ensuring national security of Ukraine]. *Biuletyn Ministerstva yustytzii Ukrainy*, 8, pp. 81–89 (in Ukrainian).
2. Savchenko, M. D. (2000). Konstytutsiinyi Sud ta Uporzynovazhenyi z prav liudyny u derzhavnomu mekhanizmi zakhystu prav i svobod liudyny i hromadianyna [The Constitutional Court and the Ombudsman in the State Mechanism for the Protection of Human and Citizen Rights and Freedoms]. *Visnyk Konstytutsiinoho Sudu Ukrainy*, 1, pp. 68–83 (in Ukrainian).
3. Volynka, K. G. (2000). Problemy zberezhenia prav i svobod osoby v Ukraini [Problems of preserving the rights and freedoms of the individual in Ukraine]. *Liudyna i polityka*, 1, pp. 64–68 (in Ukrainian).
4. Oliynyk, A. Yu. (1997). Mekhanizm, formy, metody, osoblyvosti zabezpechennia realizatsii prav liudyny i hromadianyna orhanamy vnutrishnikh sprav [Mechanism, forms, methods, features of ensuring the implementation of human and civil rights by internal affairs bodies]. Kyiv: Natsionalna akademiia vnutrishnikh sprav Ukrainy (in Ukrainian).
5. Khvostina, I. M. (2015). Mekhanizm upravlinnia rozvytkom pidpriemstva [Enterprise development management mechanism]. *Investytzii: praktyka ta dosvid*, 1, pp. 30–33 (in Ukrainian).
6. Halunko, V. V., Kurylo, V. I., Koroyed, S. O. et al. (2015). Administratyvne pravo Ukrainy: Pidruchnyk. T. 1. Zahalne administratyvne pravo [Administrative Law of Ukraine: Textbook. Vol. 1. General Administrative Law]. Kherson: Hrin D. S. (in Ukrainian).
7. Rabinovych, P. M., Khavroniuk, M. I. (2004). Prava liudyny i hromadianyna: Pidruchnyk [Human and Citizen Rights: A Textbook]. Kyiv: Ataka (in Ukrainian).
8. United Nations Convention against Corruption: Mizhnarodnyi dokument vid 31.10.2003 [United Nations Convention against Corruption]. Available at: [https://zakon.rada.gov.ua/laws/show/995\\_c16#Text](https://zakon.rada.gov.ua/laws/show/995_c16#Text) (in Ukrainian).
9. Dobrodumov, P. (2007). Antykoruptsiina polityka yak funktsiia derzhavy [Anti-corruption policy as a function of the state]. *Pidpriemnytstvo, hospodarstvo i pravo*, 9, pp. 54–58 (in Ukrainian).
10. Pro zapobihannia koruptsii: Zakon Ukrainy vid 14.10.2014 № 1700-VII [On the Prevention of Corruption]. Available at: <https://zakon.rada.gov.ua/laws/show/1700-18#Text> (in Ukrainian).
11. Pro zasady derzhavnoi antykoruptsiinoi polityky na 2021–2025 roky: Zakon Ukrainy vid 20.06.2022 № 2322-IX [On the Principles of State Anti-Corruption Policy for 2021–2025]. Available at: <https://zakon.rada.gov.ua/laws/show/2322-18#Text> (in Ukrainian).
12. Stratehiia reformuvannia derzhavnoho upravlinnia Ukrainy na period do 2021 roku: Rozporiadzhennia Kabinetu Ministriv Ukrainy vid 24.06.2016 № 474-r [Strategy for Reforming Public Administration of Ukraine for the Period Until 2021]. Available at: <https://zakon.rada.gov.ua/laws/show/474-2016-p#n9> (in Ukrainian).

- 
13. Maslova, Ya. I. (2021). Tsyfrova reforma diialnosti Natsionalnoho ahentstva z pytan zapobihannia koruptsii [Digital reform of the activities of the National Agency for the Prevention of Corruption]. *Iurydychnyi naukovi elektronnyi zhurnal*, 8, pp. 392–395 (in Ukrainian).
14. Deiaki pytannia tsyfrovoho rozvytku: Postanova Kabinetu Ministriv Ukrainy vid 30.01.2019 № 56 [Some Issues of Digital Development]. Available at: <https://zakon.rada.gov.ua/rada/show/56-2019-п#n18> (in Ukrainian).
15. Pro zabezpechennia realizatsii deiakyykh pytan tsyfrovoho rozvytku: Nakaz Derzhavnogo ahentstva z pytan elektronnoho uriaduvannia Ukrainy vid 09.04.2019 № 24 [On Ensuring the Implementation of Some Issues of Digital Development]. Available at: <https://zakon.rada.gov.ua/rada/show/v0024883-19> (in Ukrainian).
16. Pro zvernennia hromadian: Zakon Ukrainy vid 02.10.1996 № 393/96-VR [On Citizens Appeals]. Available at: <https://surl.li/piinna> (in Ukrainian).
17. Pro administratyvnu protseduru: Zakon Ukrainy vid 17.02.2022 № 2073-IX [About the Administrative Procedure]. Available at: <https://zakon.rada.gov.ua/laws/show/2073-20#Text> (in Ukrainian).
18. Parkhomenko-Kutsevil, O. I. (2019). Formuvannia ta rozvytok suchasnykh antykoruptsiinykh orhaniv derzhavnoi vlady yak osnova zapobihannia ta podolannia koruptsii: teoriia ta metodolohiia: monohrafiia [Formation and Development of Modern Anti-Corruption Bodies of State Power as the Basis for Preventing and Overcoming Corruption: Theoretical and Methodological Analysis]. Kyiv: DP “Vydavnychy dim “Personal” (in Ukrainian).
19. Konstytutsiia Ukrainy: pryiniata na piatii sesii Verkhovnoi Rady Ukrainy 28 chervnia 1996 r. [Constitution of Ukraine]. Available at: <https://zakon.rada.gov.ua/laws/show/254к/96-бп#Text> (in Ukrainian).
20. European Strategy for Innovation and Good Governance at Local Level: Mizhnarodnyi dokument vid 16.09.2007 [International Document]. Available at: <https://surl.li/dargif> (in Ukrainian).
21. Good Governance as a Universal Value. United Nations Development Programme Project. Available at: <https://eduhub.in.ua/files/159610634056098.pdf> (in Ukrainian).
22. Pro zasady derzhavnoi antykoruptsiinoi polityky na 2021–2025 roky: Zakon Ukrainy vid 20.06.2022 № 2322-IX [On the Principles of State Anti-Corruption Policy for 2021–2025]. Available at: <https://zakon.rada.gov.ua/laws/show/2322-18#Text> (in Ukrainian).
23. Nonik, V. V. (2019). Osnovni komponenty formuvannia ta realizatsii antykoruptsiinoi polityky v Ukraini [Basic Components of the Formation and Implementation of Anti-Corruption Policy in Ukraine]. *Publichne upravlinnia ta mytne administruvannia*, 1(20), pp. 86–93 (in Ukrainian).
24. Inter-American Convention against Corruption: Mizhnarodnyi dokument vid 29.03.1996 [International Document]. Available at: [https://zakon.rada.gov.ua/laws/show/998\\_089](https://zakon.rada.gov.ua/laws/show/998_089) (in Ukrainian).
25. Pro zatverdzhennia Metodyky otsiniuvannia koruptsiinykh ryzykiv u diialnosti orhaniv vlady: Nakaz Natsionalnoho ahentstva z pytan zapobihannia koruptsii vid 02.12.2016 № 126 [On Approval of the Methodology for Assessing Corruption Risks]. Available at: <https://zakon.rada.gov.ua/laws/show/z1718-16#n13> (in Ukrainian).
26. Pro vdoskonalennia protsesu upravlinnia koruptsiinymy ryzykamy: Nakaz Natsionalnoho ahentstva z pytan zapobihannia koruptsii vid 28.12.2021 № 830/21 [On Improving the Corruption Risk Management Process]. Available at: <https://zakon.rada.gov.ua/laws/show/z0219-22#Text> (in Ukrainian).
27. Official website of the National Agency for the Prevention of Corruption. Available at: [https://nazk.gov.ua/uk/?post\\_type=documents&s=&doc\\_type=doc\\_type17](https://nazk.gov.ua/uk/?post_type=documents&s=&doc_type=doc_type17) (in Ukrainian).
28. Yakovlev, I. P. (2016). Formy ta metody derzhavnogo upravlinnia u sferi mytnoi spravy: dysertatsiia kandydata yurydychnykh nauk [Forms and Methods of Public Administration in State Customs Affairs: PhD Diss.]. Odesa (in Ukrainian).
29. Kodeks administratyvnogo sudochynstva Ukrainy: Zakon Ukrainy vid 06.07.2005 № 2747-IV [Code of Administrative Procedure of Ukraine]. Available at: <https://zakon.rada.gov.ua/laws/show/2747-15> (in Ukrainian).
30. Pro zatverdzhennia formy deklaratsii osoby, upovnovazhenoi na vykonannia funkt sii derzhavy abo mistsevoho samovriaduvannia: Nakaz Natsionalnoho ahentstva z pytan zapobihannia koruptsii vid 23.07.2021 № 449/21 [On Approval of the Declaration Form of a Person Authorized to Perform State or Local Government Functions]. Available at: <https://zakon.rada.gov.ua/laws/show/z0987-21#Text> (in Ukrainian).
31. Polozhennia pro Upravlinnia prosvitnytskoi roboty ta navchalnykh prohram: Nakaz Natsionalnoho ahentstva z pytan zapobihannia koruptsii vid 21.05.2020 № 2132/20 [Regulation on the Department of Educational Work and Training Programs]. Available at: <https://surl.li/feakuz> (in Ukrainian).
32. Pro provedennia perevirky dobrochesnosti ta monitorynhu sposobu zhyttia pratsivnykiv Natsionalnoho ahentstva z pytan zapobihannia koruptsii: Nakaz vid 24.12.2020 № 595/20 [On Conducting an Integrity Check and Monitoring the Lifestyle of Employees of the National Agency for the Prevention of Corruption]. Available at: <https://surl.li/bdchtk> (in Ukrainian).
-

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33.Poriadok formuvannia, vedennia ta opryliudnennia (nadannia) informatsii Yedynoho derzhavnoho reiestru deklaratsii osib, upovnovazhenykh na vykonannia funktsii derzhavy abo mistsevoho samovriaduvannia: Nakaz Natsionalnoho ahentstva z pytan zapobihannia koruptsii vid 29.07.2021 № 448/21 [Procedure for the Formation, Maintenance, and Disclosure (Provision) of Information of the Unified State Register of Declarations of Persons Authorized to Perform State or Local Government Functions]. Available at: <https://zakon.rada.gov.ua/laws/show/z0986-21#Text> (in Ukrainian).

## МЕХАНІЗМ ЗАБЕЗПЕЧЕННЯ РЕАЛІЗАЦІЇ АНТИКОРУПЦІЙНОЇ ПОЛІТИКИ ТА ЇЇ ОКРЕМІ ЕЛЕМЕНТИ ЯК УМОВА ЄВРОПЕЙСЬКОЇ ІНТЕГРАЦІЇ УКРАЇНИ

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Стаття присвячена проблематиці антикорупційної політики, що є ваговою складовою демократичного устрою в Україні. **Метою** є встановлення сутності механізму забезпечення та реалізації антикорупційної політики, що деталізується через детермінацію окремих складових цього механізму, зокрема заходів та способів забезпечення реалізації антикорупційної політики, що в подальшому будуть іменовані як інструменти забезпечення реалізації антикорупційної політики та принципів забезпечення реалізації антикорупційної політики. **Методи:** при здійсненні цього дослідження використано загальні та спеціальні методи наукового пізнання. Метод порівняльного аналізу було використано для визначення якісних характеристик механізму забезпечення реалізації антикорупційної політики. Метод аналізу було використано при детермінації якісних та кількісних ознак, що характеризують особливості виділення структурних елементів механізму забезпечення корупції. Формально-логічний метод використано для встановлення ознак та сутності окремих структурних елементів механізму забезпечення реалізації антикорупційної політики.

**Результати та висновки:** в результаті встановлено, що в Україні нагальною є потреба в коригуванні антикорупційної політики таким чином, щоб наявні її складові були удосконалені до умов євроінтеграції. Доцільним є використання комбінованого підходу до структуризації механізму забезпечення реалізації антикорупційної політики та виокремлення таких його складових: 1) способи формального втілення антикорупційної політики; 2) нормативно-правове регулювання забезпечення реалізації антикорупційної політики; 3) інституційне забезпечення реалізації антикорупційної політики; 4) заходи та способи забезпечення реалізації антикорупційної політики, що в подальшому будуть іменовані як інструменти забезпечення реалізації антикорупційної політики; 5) принципи забезпечення реалізації антикорупційної політики; 6) процедури забезпечення реалізації антикорупційної політики. Термін «інструменти» використано як узагальнюючий та такий, що об'єднує заходи та способи забезпечення реалізації антикорупційної політики, що обґрунтовується наступним: 1) використання терміну «заходи» в антикорупційній сфері пов'язано з позначенням конкретних напрямів впливу на подолання означеного



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негативного явища; 2) термін «спосіб» – використовується для позначення того, яким саме чином здійснюється нормативно встановлений вплив на конкретний об'єкт, що підданий впорядкуванню; 3) поняття «інструменти» відображає якісні ознаки як заходів, так і способів забезпечення реалізації антикорупційної політики в їх діалектичному взаємозв'язку.

Встановлено, що захід як елемент цілісного механізму перетворюється на інструмент забезпечення реалізації антикорупційної політики лише після його втілення у конкретно визначену: а) правову форму, яка реалізується через прийняття нормативно-правових актів; прийняття адміністративних (індивідуальних) актів; укладання адміністративних договорів; вчинення інших юридично значимих дій; б) неправову форму, яка реалізується шляхом здійснення організаційних дій; виконання матеріально-технічних операцій, проведення нарад чи консультацій. Запропоновано підхід до трактування визначення принципів антикорупційної політики в широкому значенні через віднесення до них як загальних принципів функціонування суб'єктів владних повноважень, так і врахування спеціальних принципів запобігання корупції.

**Ключові слова:** корупція, державна політика, публічний інтерес, впорядкування, механізм принципи, інструменти, антикорупційна складова.