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**COMPARISON OF PUBLIC ADMINISTRATION POLICY AND
ADMINISTRATION IN THE FIELD OF STRUGGLE WITH CORRUPTION IN
UKRAINE AND SINGAPORE**

In the article, based on the analysis of the international index «Transparency International» for 2022 (CPI), a comparison of public management and administration policies in the field of anti-corruption of Ukraine and Singapore from the moment of their independence to the present day is carried out. The activities of the main, universal anti-corruption bodies with a special status of these countries, which implement the policy of combating corruption and other criminal offenses, their laws on the prevention of corruption, which these bodies are guided by to fulfill their duties, are analyzed.

A comparison of the socially oriented anti-corruption legislation of the studied countries and the basic laws of the above-mentioned countries was made. The powers of managers and employees of such bodies were analyzed. A comparison of the criminal and other laws of these countries regarding the application of preventive measures and punishments in case of detection of corruption crimes was carried out.

Particular attention is focused on the dependence of the country's economic development, its level of perception of corruption, and it is established that a more developed country, which is able to adequately pay for the work of officials, is able to control them.

It has been established that the normative policies of the above-mentioned countries are approximately at the same level, so the fight against corruption is primarily based on economic factors.

Key words: *corruption, CPI index, Ukraine, Singapore, Law, anti-corruption, power.*

Problem statement. Corruption remains one of the most acute problems of the world. Despite significant research in the field of combating and countering corruption, to date there is not a single country in the world in which corruption has been completely eradicated.

Analysis of recent research and publications. To cover the topic, articles and reports of international organizations, such as: Transparency International, the main laws of countries on combating corruption, and the following scientists were studied, analyzed and summarized: L. Shmal, A. Prykhodko, V Nonik.

The purpose of the work is to compare the policies of public management and administration in the field of combating corruption in Ukraine and Singapore, to analyze the effective methods of public management and administration policies of the countries.

Main material presenting. According to the Corruption Perceptions Index (CPI), Singapore has consistently been in the top 10 countries throughout the 21st century, and is perceived as one of the least corrupt countries. As of 2022, Singapore is in 5th position with 83 points out of a possible 100. This indicator stably fluctuates within 87-83 points.

In 2022, Ukraine is on the 116th place with only 33 points, and it also consistently occupies the 116th-120th places, which is obviously much lower than Singapore.

The CPI index is based on several independent surveys involving international financial and human rights experts, including from the Asian and African Development Banks, the World Bank and the international organization Freedom House.

The countries in the rating are ordered according to the level of corruption, which is based on the assessments of entrepreneurs and analysts. The rating for 2015 reproduces

the perception of corruption in 167 countries on a scale from 100 (no corruption) to 0 (extreme corruption).

In 2010, Georgy Derlugyan, professor of sociology at Northwestern University, noted that corruption is extremely difficult to measure, and that ratings should not be trusted definitively: «According to all Transparency International ratings, Iceland ranked first,» he says. — Until we found out what kind of banks there actually were, how they were in contact with several powerful families and with the two political parties that have been ruling the country for the past decades. This example shows how incomplete the index is».

However, in order to improve the policy of public management and administration in the field of combating corruption in Ukraine, it is suggested to compare it with Singapore - a country that is perceived as one of the most non-corrupt and is consistently in the top of the CPI rating.

For effective law enforcement, the Singapore government decided to create a Bureau - a universal anti-corruption agency. The name CPIB in translation from the Chinese language literally means: «Bureau for the Investigation of Contagious Greed.» The Corruption Investigation Bureau (CPIB), which has been given political and functional independence, is a specialized anti-corruption body. This independent body fights corruption in the public and private sectors of Singapore's economy, investigates cases of abuse among public officials and reports them to the relevant authorities for necessary action.

The National Anti-Corruption Bureau of Ukraine (NABU) is the central body of the executive power in Ukraine with a special status, which is entrusted with the prevention, detection, termination, investigation and disclosure of corruption and other criminal offenses assigned to its jurisdiction, as well as the prevention of new ones. NABU was established by the President of Ukraine on April 16, 2015.

The key to the successful functioning of the Corruption Investigation Bureau in Singapore is the Prevention of Corruption Act (PCA). Article 5 (Punishment for corruption) of this law establishes the definition of a person guilty of committing a

corruption offense. She is guilty of corruption, when she alone or in complicity with someone: - illegally bribes, receives or expresses consent to receive any remuneration for herself or another person; - unlawfully gives, promises, or offers another person a reward, regardless of whether in his or third party's interests he rewards or incites another person to act or inaction in relation to any matter, real or imagined. After the completion of the investigation, the documents are handed over to the prosecutor. According to the law, charges cannot be brought without his written consent. Cases against civil servants with insufficient evidence to support prosecution are referred to the head of the department for disciplinary action. Article 15 of the Law «On Prevention of Corruption»: - the director and another specially authorized person have the right to arrest without a warrant any person suspected of committing an offense provided for by this law, against whom there are reasonable claims based on information from reliable sources; - investigators can search an arrested person and seize all things found on him - if there is evidence of illegal activity. Female suspects may be searched only by a female investigator; - any person arrested on such grounds shall be referred to a Bureau or police station. Article 17 provides for the right of the prosecutor to give permission to the director of the Bureau and his chief deputy to check «any bank accounts, partial accounts and settlement accounts» if there is a suspicion of committing an offense.

Article 18 enshrines the authority of CPIB officials to check the bank books of civil servants, and Article 19 - also their wives, children and agents, if necessary. The type of crime that was usually called illegal gain (bribery) is defined in the law as «corrupt reward». Rewards can be different and include: a) money, or gifts, fees, loans, awards, commissions, securities, various property or a share in any property, movable or immovable; b) position, job, or contract; c) payment, discharge, repayment of debt within the limits of any loan, obligation and other debts in whole or in part; d) other services, advantages of any kind, in particular, protection from fines, or insolvency, actual or anticipated, as well as exemption from actions or disciplinary sanctions, imposed or not, or leniency in the performance of an obligation, or rights within professional activity; e) an offer, attempt or promise of reward (with regard to points a, b, c and d). The powers of

CPIB employees regarding search and confiscation are determined by Article 22 of the Law - the director of the Bureau has the right to issue a warrant to employees, which gives him the authority to enter any premises, even by force, to search it, and to detain any documents, articles, or property, related to corrupt practices; – if an officer. If the Bureau has reasonable grounds to believe that a delay in obtaining a search warrant would frustrate investigative plans, it may exercise the investigative right set forth above without obtaining such a warrant. The law gave CPIB officials broad investigative powers. According to the current provision of the Law «On Prevention of Corruption», today the Bureau has all the necessary powers to fight corruption.

In addition to the Law «On the Prevention of Corruption», today in Singapore there is a socially oriented anti-corruption legislation: Singapore Penal Code. – Chapter IX. offences by or relating to public servants, laws:

Parliament (Privileges, Immunities and Powers, Political Donations Act; Customs Act; Corruption, Drug Trafficking and other Serious Crimes (Confiscation of Benefits) Act. Thus, the criminal law of Singapore stipulates that under the conditions of proving the guilt of receiving an illegal benefit (bribe), the guilty party is sentenced to imprisonment or a fine (respectively, five years in prison or 100,000 US dollars). If there are insufficient grounds for criminal prosecution, the director of the Bureau, with the consent of the prosecutor, sends the case to the head of the department dealing with disciplinary matters. If a knowingly false report has been received about a public servant, regarding the commission of relevant illegal acts, then the person who disseminated false information, for knowingly false testimony, faces a penalty of one year in prison or a fine of 10,000 US dollars. Foreign CPIB is part of the criminal justice system and works in close cooperation with the General Prosecutor's Office and the courts. persons who have been found guilty of corruption are deprived of the right to conduct economic activities on the territory of Singapore.

In the investigation process, the Bureau also cooperates with various state and government agencies and departments in order to collect evidence and obtain information necessary to prove the composition of the crime in the case under investigation, as well as

better awareness of public officials «... in matters related to corruption». In addition to state institutions, CPIB also has working private relations with various organizations. Together with the College of Civil Service, CPIB participates in various anti-corruption programs for public officials who hold managerial positions. The Bureau liaises with the Ministry of Education as part of the Study Trip Program to train university students on anti-corruption strategies in Singapore. CPIB studies the working methods of state bodies that are potentially in the danger zone in order to identify deficiencies in the management system and, if necessary, recommends their heads to take appropriate measures. The CPIB is also mandated by the government to make procedural reviews for state agencies that carry out procedures that can be used for corrupt practices. For successful operation, the bureau contacts the civilian population to raise the level of legal culture and obtain their support. There is a CPIB page on the Internet with complete information about its activities, and a telephone hotline is also available, which accepts calls, including anonymous ones, 24 hours a day (from 22:00 to 06:00). The Bureau's reference and support service is supported by the Research Unit, which analyzes the work operations of government departments prone to corruption and identifies those weak points in the organization and regulation of the work of administration units that are the cause of corruption. In addition, the staff of the Bureau regularly conducts lectures and seminars for civil servants, especially those who interact with the public, on issues such as the hidden aspects of corruption and methods of overcoming them. In Singapore, every year civil servants are required to fill out special forms for declarations of their property, assets and debts.

By making open all data on the state of income, commercial interests and financial transactions of high-ranking officials, the state administration system acquired the status of transparency of political finances. The government also decided that the representatives of the state authorities should receive such an income that the motivation to take bribes (illegal benefits) would disappear. Today, the salaries of officials reach 20-25 thousand US dollars per month, the salaries of ministers have been set up to 100 thousand US dollars per month. The salary of judges reached several hundred thousand dollars a year (in the

1990s - more than 1 million US dollars). At the same time, it is strictly controlled that security, a car with a driver and other expenses are paid exclusively for personal money. Starting from the second half of 1980, the government began to work on the «quality» of the bureaucracy. The government planned to make the profession of an official not only highly paid, but also respected and prestigious. In the fight against corruption, the leadership of Singapore relied on the principles of meritocracy and the basic canons of Confucian ethics. This means that the way to the top is open to the most intelligent, progressive thinking and capable. The selection of potential candidates begins at school, then the future administrative elite are helped to enter the university, sent to study and train abroad, encourage success and achievements, offer positions according to their abilities.

Concern for the effective use of human capital based on talent and merit, the introduction of a transparent and trustworthy system of personnel appointments in combination with an established system of real responsibility of officials had a deep meaning. The Corruption Investigation Bureau plays a major role in the application of anti-corruption legislation in practice. It considers corruption as an incentive and opportunity to participate in an act of corruption. The new general strategy is based on the principle of «logic in corruption control», i.e. «...attempts to eradicate corruption should be based on the desire to minimize or eliminate the conditions that create both an incentive and an opportunity for an individual's inclination to commit corrupt acts.» The bureau has three subdivisions: investigative, reference and informational, and auxiliary. The investigative division is the largest, it is responsible for conducting the operations of the Bureau. The reference and information and support service of the Bureau is responsible for the selection of candidates for appointment to public positions, their further promotion and even for improving the qualifications of civil servants. The selection of candidates for public service is competitive. It is similar to the procedure for issuing permits to foreign professionals when they obtain Singaporean citizenship or to the tendering of contractors for obtaining government contracts.

The anti-corruption system in Singapore is built on the principles of consistency, rigor, and logic. The main means of struggle is quick, confident, firm, fair action. CPIB firmly upholds the principles of integrity, quality management, ability to work in a team, dedication and thoroughness in the performance of official duties. The Bureau uses authoritarian methods of action, which is quite understandable given the state of the state at the time when this structure was created. It is noteworthy that all powers are regulated by law, including the possibility of arbitrariness by the Bureau's employees. This is important, because the abuse of power can destroy all the positive developments in establishing trusting relations with society in the fight against corruption. For effective law enforcement, the Bureau's investigators are empowered with extraordinary powers. Any citizen can be brought to court regardless of his status and rank. Senior officials and employees of law enforcement agencies who hold potentially corrupt positions are under special control. Perhaps the main innovation was that Bureau investigators do not need to prove that the briber actually had the opportunity to provide the required service. As a result of the CPIB 's authoritarian work methods, the government restrains manifestations of bureaucracy, successfully prevents corruption, and this, in turn, ensures a favorable investment climate in Singapore. To support the principle of transparency of the business environment, the Bureau investigates corruption in the private sector, bribery and kickbacks. In addition to this, the court imposes a fine equivalent to the received illegal benefits.

The key document of NABU activity is the Law of Ukraine dated 14.10.2014 No. 1698-VII «On the National Anti-Corruption Bureau of Ukraine», according to which the task of NABU is to combat corruption and other criminal offenses committed by senior officials authorized to perform the functions of the state or local self-government, and pose a threat to national security, as well as taking other measures prescribed by law to combat corruption. NABU carries out operational-investigative measures for the purpose of prevention, detection, termination and disclosure of criminal offenses assigned by law to its jurisdiction, as well as in operational-investigative cases requested from other law enforcement agencies; carries out pre-trial investigation of criminal offenses assigned by

law to his jurisdiction, as well as conducts pre-trial investigation of other criminal offenses in cases specified by law; takes measures to search for and seize funds and other property that may be subject to confiscation or special confiscation in criminal offenses brought under investigation. Of the National Bureau, carries out activities related to the storage of funds and other seized property; interacts with other state bodies, local self-government bodies and other subjects to fulfill their duties; carries out information and analytical work with the aim of identifying and eliminating the causes and conditions that contribute to the commission of criminal offenses assigned to the National Bureau; ensures the personal safety of the employees of the National Bureau and other persons defined by law, protection against illegal encroachments on persons participating in criminal proceedings, in the criminal offenses under investigation; ensures confidentiality and voluntary cooperation with persons who report corruption offenses; congratulates on its activities in the manner specified by this

Law and informs the society about the results of its work; carries out international cooperation within its competence in accordance with the legislation of Ukraine and international treaties of Ukraine; takes measures to identify unsubstantiated assets and collect evidence of their unsubstantiatedness, sends materials to the Specialized Anti-corruption Prosecutor's Office to resolve the issue of filing a lawsuit to declare assets unsubstantiated and collect them as state revenue; collects and sends materials to the Specialized Anti-corruption Prosecutor's Office to resolve the issue of filing a lawsuit to declare agreements invalid in cases provided for by the legislation of Ukraine. The National Bureau can, on behalf of Ukraine, provide international mandates to conduct operational, search and investigative actions, conclude agreements on cooperation on matters of its powers with foreign and international law enforcement bodies and organizations, apply on behalf of Ukraine to foreign state bodies in accordance with the legislation of Ukraine and relevant states order etc. The main law in Ukraine regarding the prevention of corruption is the Law of Ukraine dated October 14, 2014 No. 1700-VII «On Prevention of Corruption». According to Article 1, corruption is the use by an official of official powers or opportunities related to them for the purpose of obtaining an illegal

benefit. The law prescribes the powers of the National Agency for the Prevention of Corruption (NAPC), according to which the powers of the NAPC include conducting an analysis of the state of prevention and combating corruption in Ukraine, statistical data, research results and other information regarding the corruption situation. In cases of detection of a violation, the NAKC submits to the head of the relevant body, enterprise, institution, organization an order to eliminate violations of the legislation, which is mandatory for implementation. Civil servants of Ukraine submit income declarations on the official website of the NAZK. *In addition to the law «On Prevention of Corruption», other laws relating to combating corruption are in force in Ukraine today: the Code of Ukraine on Administrative Offenses dated 07.12.1984 No. 8073-X; Criminal Code of Ukraine dated April 5, 2001 No. 2341-III; Law of Ukraine dated May 14, 2013 No. 224-VII «On Amendments to Certain Legislative Acts of Ukraine Regarding Liability for Corruption Offenses»; Law of Ukraine dated September 16, 2014 No. 1682-VII «On Purification of Power».* The activities of NABU are directed and coordinated directly by the Cabinet of Ministers of Ukraine within the limits and in the manner established by the Law «On the National Anti-Corruption Bureau of Ukraine».

The independence of NABU in its activities is guaranteed. The use of NABU in party, group or personal interests is not allowed. The activities of political parties in the National Bureau are prohibited. The Cabinet of Ministers of Ukraine does not approve the Regulation on the National Anti-Corruption Bureau of Ukraine. Acts of the National Bureau cannot be canceled in whole or in part by the Cabinet of Ministers of Ukraine. Normative legal acts of the National Bureau enter into force from the day of their official publication, unless otherwise provided by such acts, but not earlier than the day of their official publication. State registration of acts /of the National Bureau by the Ministry of Justice of Ukraine is not carried out. The National Bureau is a legal entity under public law. The National Bureau, in accordance with the procedure established by legislation, has direct, including automated, access to automated information and reference systems, registers and data banks, the holder (administrator) of which are state bodies or local self-government bodies, uses state, including government, means of communication and

communications, special communication networks and other technical means. Processing of such information is carried out by the National Bureau in compliance with the legislation on the protection of personal data and ensuring confidentiality protected by law.

Conclusions. Using the example not only of Singapore, but also of other economically developed countries, the better the level of development, the less corrupt the country is perceived to be. Singapore is perceived as a less corrupt country due to high economic growth, decent wages for employees, appropriate living conditions and proper activity of human rights bodies. It is not important how the country is organized, the government's desire for development actions is more important, rather than «staying in office». Having economic potential, Ukraine was unable to realize it for its own development due to the lack of political will, unlike Singapore, which, on the contrary, did not have such potential. In Ukraine, there is a higher level of bureaucracy and its further growth, in contrast to Singapore, which makes it possible in some cases to unevenly «twist the laws». The anti-corruption public administration policies of Singapore and Ukraine as of 2023 are organized at approximately the same level, the actions of laws improve the anti-corruption situation in the fight against «shallow» corruption, but there is no control over «big» corruption, which causes the main damage to the entire state.

The policy of public management and administration in the field of fighting corruption in Ukraine needs to be modernized to our mentality.

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