
22. Corruption, ethics and integrity in public administration in Ukraine

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INTRODUCTION

Ukraine has a long history of public corruption. After independence from the Soviet Union in 1991, Ukraine began a process of privatization of critical state assets and major industries. In this process, well-connected elites leveraged their considerable resources and political influence in order to “capture” weak state institutions for their own private gain.¹ These well-connected elites, often referred to as “oligarchs,” secured extensive influence over Ukraine’s government and economic system during these chaotic early years of the post-Soviet era.² Many politicians, judges, prosecutors, and high-ranking ministers obtained, and hold, power through their relationships with corrupt oligarchs, or are the oligarchs themselves.³ This state of affairs has enabled the oligarchs and other prominent officials to leverage public offices to facilitate illicit business practices and financial gains with impunity, entrench their monopolistic control of Ukraine’s wealth, and encourage a culture of corruption amongst government officials.⁴ As a result, Ukraine struggles to devise and enforce effective anti-corruption statutes to this day.

These corrupt practices grew largely unabated until the 2004 Ukraine presidential election was undermined by massive electoral fraud in favor of the Russian-leaning candidate, Viktor Yanukovich. The Western-leaning candidate, Viktor Yushchenko, was also poisoned.^{5,6} Ukrainians expressed their indignation towards the flagrant corruption through extensive protests that came to be known as the Orange Revolution (named after the primary color associated with Yushchenko’s campaign).⁷ The protests resulted in a more open and fair run-off election, which was won by Yushchenko. However, Ukraine’s system of governance was still characterized by oligarchic monopoly and rampant corruption in public institutions.⁸

According to Transparency International’s 2007 Global Corruption Barometer, Ukraine was among the top 25 countries most affected by bribery.⁹ The next year, the Ukrainian Ministry of Interior Affairs determined that the total monetary value of bribe taking among public servants tripled in 2008 when compared to 2007.¹⁰ Even though the Orange Revolution and the resulting run-off election denied Viktor Yanukovich victory in 2004, he won the 2010 presidential election.¹¹ During Yanukovich’s regime (2010–14), Ukraine once again experienced increasing centralization of power and wealth among the oligarchs, at the expense of infringement upon the law and the constitution of Ukraine.¹²

The increase in corruption and inequality sparked a second monumental protest movement among the Ukrainian people in 2014, known as the Euromaidan Revolution.¹³ Enduring suppression, police violence, and bloodshed, the Ukrainian protesters succeeded in ousting the Yanukovich administration.¹⁴ After the Euromaidan Revolution, the Ukrainian government,

with the help of international organizations and civil societies, began a series of reforms to combat its entrenched public corruption issue.¹⁵ Some highlights of these reforms included:

- the introduction of a centralized electronic procurement and auction platform;
- the requirement of electronic asset declarations for public officials;
- the development of an integrated electronic human resources hub to track, store, and analyze recruitment and management information; and
- the establishment of the National Anti-Corruption Bureau, High Anti-Corruption Court, and many more.^{16, 17, 18, 19}

The success of these reforms has varied due to the obstructions of the entrenched interests.²⁰ While there are many remaining issues, and a long way ahead in Ukraine's long-term battle against corruption, the post-Euromaidan reforms are meaningful and encouraging steps in the right direction.

This chapter aims to provide an overview of some of the major sectors of public corruption in Ukraine, describe significant incidents that illuminate the specific corruption issues faced by each sector, and highlight the major responding reforms in each sector. Some of the common problems include unequal access to profitable public bidding and auction opportunities, abuse of state authorities for private protection, and a lack of transparency, which breeds additional opportunities for corrupt behavior.^{21, 22} The World Bank's definition of corruption: *the abuse of public office for private gain*,²³ covers when officials accept, solicit, or extort bribes and when private agents actively offer bribes to circumvent public policies and processes for competitive advantage and profit, as well as patronage, nepotism, the theft of state assets, and the diversion of state revenues.²⁴ All of which are found in Ukraine.

PROCUREMENT

Procurement contracts with the Ukrainian government have historically been beset by endemic corruption, a lack of transparency, and ineffective enforcement mechanisms that fail to prevent collusion among large, politically connected companies and their oligarchs.²⁵ From military acquisitions to pharmaceuticals contracts, widespread procurement corruption has led to massive cost overruns, the disappearance of public funds, and the poor quality of received goods and services.^{26, 27}

There are three primary avenues of corruption in government procurement. First, "competitors" in industry cartels collude and coordinate their bids to maximize the final price of the contract, or alternatively, leverage their influence with government actors to ensure that competitors are excluded from the bidding process.^{28, 29} Second, corrupt actors engage in regulatory capture to illicitly promote their own bids, hinder government investigations and transparency efforts, and/or manipulate the prices for contracted goods and services. Finally, corrupt actors that lose bids regularly use judicial or regulatory mechanisms, as well as bribes, intimidation, or both, to block or delay the final award of contracts.³⁰ Taken together, these mechanisms provided corrupt actors with many potential means to manipulate the procurement process.

Medical procurement in Ukraine is a good example. Medical procurement has been marked by collusion and corrupt behavior concentrated in a small number of politically connected firms.³¹ Major government procurement contracts were regularly awarded to a small number of opaque, politically connected conglomerates, many owned by oligarchs with ties to

members of the Ukrainian parliament and bureaucracy.³² This select group of companies, nicknamed “the pharmaceutical mafia” by the *Kyiv Post*, used a number of anti-competitive practices to win national tenders, despite charging exorbitant prices for low-quality medical supplies and pharmaceuticals.³³ Prior to the procurement reforms introduced in the mid-2010s, the Ukrainian government struggled to ensure that it paid reasonable prices for contracted goods and services.

These practices depleted allocated government funding so quickly that there were drug shortages for HIV/AIDS, tuberculosis, and cancer medications.³⁴ As an example, in 2009, after an influenza epidemic, then-prime minister Yulia Tymoshenko signed a decree allocating 1 billion Ukrainian hryvnia (UAH), approximately 100 million United States dollars (USD), to purchase vaccines and fight the epidemic.³⁵ To acquire the vaccines, the government contracted with Interfarm, one of Ukraine’s biggest medical suppliers.³⁶ However, the project quickly came under scrutiny due to claims that the prices of millions of doses of the influenza vaccine were artificially inflated.³⁷ Interfarm was accused of entering into a sham contract for the purchase of these vaccines with an Oregon-based company, Olden Group.³⁸ The two companies allegedly submitted false invoices and customs declaration forms to sell vaccines to the Ukrainian government for more than twice their original purchase price.³⁹ In 2011, a federal district court in Oregon entered a default judgment against the Olden Group for its involvement in the fraudulent schemes with Interfarm, and ordered it to pay 60 million USD to the Ukrainian government.⁴⁰ Unfortunately, the primary victims of these schemes were Ukraine’s sickest and most vulnerable citizens,⁴¹ who never obtained the treatments they needed and the judgment was no value to them.

Another anti-competitive practice is where multiple bidding companies are owned by the same person. These “staged bidding competitions” regularly resulted in procurement prices 150 to 300 percent higher than the same drug prices acquired by patients’ organizations or non-profits.⁴² In 2014 Lumier Pharma and Pharmadis both competed for a contract to supply anti-hepatitis drugs to the Ukrainian government. The contract was eventually won by Lumier Pharma.⁴³ However, both competing companies registered identical addresses and phone numbers, and were both parts of Bahriy’s Group, a complex web of pharmaceutical companies controlled by Petro Bahriy, the president of the Ukrainian Association of Medicine Producers and a member of the Council of Entrepreneurs under the Cabinet of Ministers of Ukraine.⁴⁴ When these companies were not awarded contracts, they frequently filed complaints in the Antimonopoly Committee to contest the award of contracts to the tender winners.^{45,46} As a result of these corrupt, anti-competitive practices, Bahriy’s Group received more than 90 percent of the government funding allocated for hepatitis drugs in 2014, and almost 200 pharmaceutical lot contracts were divided amongst these two companies in 2013 and 2014.⁴⁷

In March 2015, the Ukrainian Parliament passed a groundbreaking reform bill to tackle the deep-seated corruption in medical procurement, despite the opposition of domestic drug companies. The bill transitioned procurement responsibility for 12 state programs for the seriously ill from domestic pharmaceutical companies to international organizations such as UNICEF, the United Nations Development Programme (UNDP), and Crown Agents.⁴⁸ Finding this method effective in curbing corruption, lowering cost, and increasing the variety of available medications, the Ministry of Health transferred all procurement programs to international organizations in 2016.^{49,50} In January 2019, 90 percent of tumor medicines for adults were procured at a lower price than before the transition, with some cancer medication prices reduced

by 80 to 95 percent.⁵¹ Beyond Ukraine's borders, similar procurement practices were adopted by Bosnia and Herzegovina, Kazakhstan, Moldova, Turkmenistan, and Uzbekistan.⁵²

Many of the same corrupt practices observed in the medical sector are prevalent in the defense procurement sector. The *Kyiv Post* reported that Ukraine's top defense industry managers siphoned almost 100 million UAH (3.8 million USD) in funds allocated to buy spare parts for armored vehicles between 2014 and 2015.⁵³ In this scheme, elements of Ukraine's state-owned defense conglomerate, UkrOboronProm, contracted with a web of shell companies and intermediaries to obtain the spare parts, several of which had no production capacity, defense procurement expertise, or even a physical address.⁵⁴ Partially due to this opaque structure, poor bid selection, and inadequate oversight of the project, Kyiv Armored Plant, which had contracted for the spare parts, was never supplied with components under the contract.⁵⁵

To increase the transparency of Ukraine's public procurement process and increase competition in government tenders, Ukraine passed a law in December 2015 that began mandating that procurement take place through a new electronic procurement platform named "ProZorro."⁵⁶ This system sought to reduce the likelihood of collusion, and other anti-competitive practices, by providing a transparent, centralized mechanism for requesting proposals, submitting bids, conducting auctions, and providing detailed information about competitors for public contracts.⁵⁷ In August 2016, electronic procurement through ProZorro became mandatory, and all procurers of public purchases transitioned to using it exclusively.⁵⁸ Notably, Ukraine's ProZorro electronic public procurement system won the 2016 Open Government Award at the Open Government Partnership Summit in Paris.⁵⁹

This transition to ProZorro greatly improved transparency, accessibility, and competitiveness in the public procurement process. The Ministry of Economic Development and Trade estimates that the Ukrainian government saved more than 86 billion UAH between 2016 and 2019 by using the ProZorro system, while also obtaining tangible benefits in the quality of supplied goods and services.⁶⁰ By purchasing food products through the ProZorro system, the Ministry of Defense was able to reduce its food expenditure by 34 percent.⁶¹ During the electronic auction for this contract, the competition drove the price down from 3.24 million UAH to 2.15 million UAH, and a company that had never before participated in the government procurement process became the winner.⁶² As a result of this auction, the Ministry of Defense obtained access to comprehensive cost calculations for the first time, and the number of different food products in soldiers' rations increased from 32 to 248.⁶³

Ukraine has made remarkable progress in reforming public procurement and reducing the incidence of procurement-related corruption, even receiving praise from the Organisation for Economic Co-operation and Development in 2016.⁶⁴ However, particularly lucrative sectors such as military procurement still struggle with entrenched corruption. In early 2019, close associates of Oleh Hladkovskiy, a senior defense official and a former business partner of then-president Poroshenko, were allegedly involved in laundering 9.2 million USD from defense procurement contracts.⁶⁵ In this scheme, Hladkovskiy's son is claimed to have coerced and bribed directors of a state-owned enterprise to buy smuggled Russian military components at wildly inflated prices and deliberately misidentified the parts during importation to conceal their origin, value, and purpose.^{66,67,68} While the relevant contract was reported on ProZorro, the associated records were sparse and misleading, in one instance stating that 14.38 million UAH was to be paid for "special equipment."⁶⁹ While the affair led to criminal investigations and comprehensive international audits of the Ukrainian defense industry and its officials, it

also highlights the enduring challenge that corruption and undue political influence presents for Ukraine and the ProZorro system.⁷⁰

DELIVERY OF SERVICES

Since Ukraine's independence, public service delivery has suffered from the undue influence of senior government officials and exploitation to illicitly enrich public servants as well as their allies outside government. These corrupt practices have reduced the quality of the public services provided. Ukraine's judiciary and law enforcement consistently rank among Ukraine's least trusted government agencies.⁷¹ The judicial branch lacked independence from political pressure as a result of both formal institutional arrangements and informal applications of power, enabling powerful actors to escape prosecution.⁷² The Ukrainian police forces were, and in many respects still are, often unaccountable, secretive entities that facilitate public and civil society harassment and repression.⁷³

Due to a legacy of undue political influence, which has served to protect prominent individuals and business interests, the judicial branch has historically been perceived to favor Ukrainian elites. In particular, the Office of the Prosecutor General of Ukraine has often functioned as a vessel for protecting the political and economic interests of Ukrainian presidents and their associates.⁷⁴ The same holds true for other judicial offices, as oligarchs and other elites have leveraged their political influence to install amenable prosecutors, judges, and investigators into prominent positions.⁷⁵ The prevalence of this problem is reflected in the public's perception of corruption in Ukraine. According to Transparency International's 2007 Global Corruption Barometer, the judiciary was deemed Ukraine's most corrupt institution.⁷⁶ In the 2010 Global Corruption Barometer, Ukraine's judiciary system was deemed the most corrupt in the world.⁷⁷

Ukraine struggled to cleanse its judiciary of ubiquitous bribe taking and punish the abuse of legal authority prior to post-Euromaidan reforms. In 2008, a former Lviv appellate court judge was caught accepting a 100,000 USD bribe.⁷⁸ A subsequent search of the judge's house revealed over 1 million USD in cash, which he called "housewarming gifts."⁷⁹ In addition to accepting bribes from government officials, judges also actively solicited bribes from ordinary citizens. In 2011, a district court judge in Kyiv was arrested after taking a 1,000 USD bribe, which he allegedly demanded from a Kyiv resident in exchange for not imposing a prison sentence.⁸⁰ Judicial authority was also wielded as a tool for suppression. During the Euromaidan Revolution, one of then president Yanukovich's loyalists, Mykola Chaus, issued numerous rulings against the protesters. On appeal, these rulings were found unlawful by the disciplinary section of the High Council of Justice.⁸¹ Nevertheless, the High Council of Justice refused to dismiss the judge.⁸²

Ukraine's police force has traditionally been well integrated into the power structure of the executive branch, making it unaccountable to the public.⁸³ Ukraine's Ombudsperson's Office stated that they received approximately 5,000 complaints of torture and other ill-treatment by law enforcement in 2010.⁸⁴ Almost all of these complaints were ignored or dismissed without further investigation.⁸⁵ A 2011 Amnesty International report revealed widespread usage of torture, extortion, and arbitrary detention by the police, which was rarely punished due to flawed investigations, harassment or the intimidation of complainants, and an unwillingness to prosecute such crimes.⁸⁶

The Ukrainian police force was also frequently employed as a weapon to punish disobedient journalists and silence dissent. In June 2000, a journalist was kidnapped and beaten by three policemen, whom were led by Ukraine's then-police general, Oleksiy Pukach.⁸⁷ In September 2000, Pukach and his police officers kidnapped and murdered a prominent critic of then-president Kuchma after the critic exposed high-level corruption.^{88,89} During Pukach's 2009 trial, he testified that Kuchma and former interior minister, Yuriy Kravchenko, had ordered him to kill the critic.⁹⁰ Despite Pukach's testimony, which was corroborated by wiretap recordings of Kuchma, no more senior Ukrainian officials were charged with a crime.^{91,92} In 2001, a group of senior police officers murdered another high-profile journalist in Donetsk Oblast and then falsified evidence to frame a local homeless man for the murder, who was later poisoned after being found not guilty by the court.⁹³ Investigations revealed that a local crime boss directed the policemen's actions because the journalist had helped expose a conspiracy between the crime gang and the local police.⁹⁴ These rampant collusions among police officials, politicians, and criminal organizations targeting journalists impeded the independence of Ukraine's media and increased the atmosphere of impunity for corrupt conduct.

In addition to targeting journalists, Ukrainian law enforcement routinely harassed citizens and vulnerable populations. A common scheme would involve arresting people using false evidence, followed by a demand for a bribe as a condition for release. In 2010, hundreds of shop owners and workers at Kyiv's largest street market, many of whom were recent immigrants, were repeatedly targeted, forcibly detained, accused of minor violations, and compelled to pay a bribe before release.⁹⁵ In some incidences, policemen would use, or threaten to use, physical violence and demand bribes against innocent citizens, and then claim that they were acting in self-defense following any accusations of misconduct.⁹⁶

After the Euromaidan Revolution, Ukraine worked to establish and strengthen impartial law enforcement institutions. In October, 2014, the Ukrainian parliament passed new legislation to establish the National Anti-Corruption Bureau of Ukraine (NABU), which is a specialized law enforcement body charged with investigating and solving corruption-related offenses committed by senior officials of the Ukrainian government.^{97,98} NABU was designed to be insulated from domestic political interference.⁹⁹ According to the statute, NABU receives funding directly from Ukraine's state budget. Most appointments are required to go through open competitions and be made in accordance with transparent results.¹⁰⁰ Moreover, multiple independent government agencies are involved in supervising NABU's conduct, aiming to prevent abuses of power.¹⁰¹ NABU personnel also receive training and supervision from the US Federal Bureau of Investigation, adding another layer of external oversight to ensure honest and independent investigations.^{102,103}

Partially due to these built-in safeguards to shield NABU from political influence, NABU was able to investigate and prosecute some prominent officials for corruption. In August 2016, NABU obtained convincing evidence against an allegedly corrupt district court judge.^{104,105,106} The NABU case alleges that the judge had regularly received court cases crucial to high-profile political elites, inconsistent with the random case assignment system.^{107,108} The judge consistently ruled in favor of elites, such as Yanukovich's and Poroshenko's allies, and issued arrest warrants against their opponents.^{109,110} However, because NABU was legally required to wait for parliament's approval before being able to arrest any judges, this judge was able to flee to Moldova in 2017.¹¹¹ Since then, NABU had been working with the Moldovan government on extradition for prosecution, but the case was still not resolved as of October 2019.¹¹²

NABU was set up to prevent domestic interference in its activities, however, its ability to jail officials for corrupt behavior meant that many politicians and officials were incentivized to rescind or restrict this “dangerous” power. Ukraine’s Prosecutor General’s Office (PGO) has clashed with NABU and obstructed NABU’s investigations on multiple occasions.¹¹³ In November 2018, the PGO, along with the Security Service of Ukraine, disrupted NABU’s corruption investigation on the State Migration Service by publishing the personal information of NABU’s undercover agents.¹¹⁴ After having their cover blown, the agents were arrested for “provoking an official to take bribes.”¹¹⁵ Moreover, members of the Ukrainian parliament have also attempted to restrict NABU’s independence by submitting a bill that would enable the parliament to fire the head of NABU without an audit of his performance.¹¹⁶ Fortunately, this bill was eventually removed from the legislative agenda after Western criticisms.¹¹⁷

Ukraine’s effort to reform its police force has struggled, in spite of several promising developments early in the reform process. In 2015, following a model that had proven effective in Georgia, Ukraine fired approximately 17,000 police officers and replaced them with new, Western-trained patrol police.¹¹⁸ This community-oriented police force undertook a 10.5 week training funded and guided by the US.^{119,120} They were then equipped with uniforms, vehicles, and other equipment funded by the United Kingdom, the US, and Japan. This reform also raised the starting salaries of patrol police officers from 2,000 UAH (95 USD) a month to 8,000 UAH (380 USD).¹²¹

In the short term, this effort improved the image of the national police force, which had been struggling to regain and maintain public trust. Within one year, the 23 cities across the country that implemented this police reform had seen dramatic improvements in public satisfaction with police activities.¹²² However, this reform did not install long-term measures to curb political manipulation.¹²³ The interior minister, Arsen Avakov, who orchestrated the plan for the national police reform, centralized the power to control the police in his own hands.¹²⁴ With this solidified power, Avakov appropriated Ukraine’s police force to promote the political interests of his party, the People’s Front, and employed police officers to prevent family members from being investigated.¹²⁵

To more effectively litigate corruption-related cases in courts and close a substantial gap in Ukraine’s anti-corruption apparatus, Ukraine launched the High Anti-Corruption Court (HACC) in 2019, populated by 38 new judges charged with deciding criminal cases related to corruption.¹²⁶ However, the HACC faces many challenges, such as case overload and resource constraints.¹²⁷ Ukraine’s new president, Volodymyr Zelensky, won the 2019 presidential election on the promise of stamping out Ukraine’s entrenched corruption, but the HACC still has not received adequate funding or staff.

OUTSOURCING OF STATE FUNCTIONS

Since its independence, Ukraine has undertaken multiple rounds of outsourcing and privatization to divest itself of state ownership or direct control of state-managed functions. Unfortunately these processes have been misused by politicians to reward their supporters.¹²⁸ In effect, the privatization process that was intended to enlarge Ukraine’s private sector and improve competitiveness in the market has regularly functioned to increase market concentration in favor of politically connected businesses, especially in the most profitable industries.¹²⁹ Selective privatization was also used as a tool to secure support from prominent oligarchs

ahead of elections, resulting in state assets being transferred to already dominant companies and an increase in the conglomerates' monopolistic powers.¹³⁰

Many lucrative state-owned assets were sold to political insiders at a fraction of their true value.¹³¹ Former president Leonid Kuchma's son-in-law, Victor Pinchuk, purchased his multi-billion dollar assets at far less than their fair market price during Ukraine's early privatization process.¹³² In 2004, Pinchuk began a partnership with Rinat Akhmetov, who maintained deep political and economic links to a significant number of parliament members as one of Ukraine's wealthiest oligarchs, and was himself a member of parliament from 2001 to 2006.^{133,134,135} Through a consortium jointly controlled by Pinchuk and Akhmetov, they acquired Ukraine's largest steel producer, Kryvorizhstal, for the equivalent of 800 million USD, despite much higher bids made by foreign companies, including Mittal Steel, one of the world's largest steel producers.^{136,137} The deal was invalidated in 2007 because it was widely criticized both domestically and abroad as an example of corruption and mismanagement of state property.¹³⁸

After securing major government assets in privatization auctions, well-connected oligarchs would frequently use the resulting profits and political influence to secure additional privatized assets, further increasing their already considerable influence in a vicious cycle. In 2005, Metinvest and Privat, two companies owned by Akhmetov and another prominent oligarch, Igor Kolomoisky, acquired iron ore production facilities and other multi-billion dollar strategic assets at fire-sale prices in the closing months of Kuchma's tenure.¹³⁹ Ironically, these heavily criticized auctions were approved by the Anti-Monopoly Committee, which was severely underequipped with staff and resources.¹⁴⁰ Similarly, after Akhmetov provided Yanukovich's 2010 presidential campaign with substantial financial backing, Akhmetov quickly won five major government privatization auctions.¹⁴¹ These privatized enterprises include some of Ukraine's biggest thermal and power generators and distributors, boosting Akhmetov's wealth by 3 billion USD in six months.^{142,143}

In recent years, Ukraine endeavored to address these issues by introducing pro-competition and transparency reforms into its privatization process. In January 2018, the Ukrainian parliament passed a law that simplified existing categories of state-owned enterprises to only "small objects," which includes assets worth less than 250 million UAH (around 1 million USD), and "large objects," which include everything else.^{144,145} The law was aimed at making the privatization of over 3,000 mostly loss-making state companies more expedient and transparent.^{146,147}

This law represents a step in the right direction, but it is not a panacea for all issues that exist in Ukraine's privatization. While the Ukrainian government produces an annual budget plan to sell assets and companies, it has not composed a comprehensive privatization strategy that could help Ukraine maximize the value of privatization for its economy as a whole.¹⁴⁸ Instead, the government's budget plans have been narrowly focused on raising money for the government's annual budget.¹⁴⁹ Moving forward, a more holistic vision will be needed in Ukraine's upcoming fight to further deter corruption in state auctions and prevent oligarchic enterprises from monopolizing the privatization process.

ISSUING OF PERMITS AND LICENSES

Permits and licenses are critical to starting and operating businesses. When the government controls the entrance to a market with the issuance of permits and licenses, it is crucial to

ensure that officials wielding this power do not use this public function for private enrichment or to serve the interests of oligarch businesses. Unfortunately, the issuing of permits and licenses in Ukraine suffers from this type of corrupt abuse in various fields.

For instance, land allocation is often exploited by officials as a lucrative opportunity to elicit bribes.¹⁵⁰ In 2008, a township council member of Crimea elicited a 5.2 million USD bribe in return for the government allowance to lease 17 hectares of land.¹⁵¹ In the same year, a village council chair of Kyiv Oblast allegedly demanded 1.3 million USD for allocating land to select businesses.¹⁵² The highly regulated nature of land use in Ukraine placed immense power in the hands of the government, which made corrupt dealings on land a particularly attractive money-making tool for officials.

In addition to land allocation, other licensing processes such as those for liquor sale, construction, business registration, lottery, and gambling also suffer from opaque and corrupt dealings. The application for construction permits in Ukraine is characterized by a lengthy processing time and onerous procedures, making the business nearly impossible to enter without connections and bribes.¹⁵³ In 2008, a department director in charge of licensing the sale of alcoholic drinks and tobacco goods at Ukraine's State Tax Service was arrested for taking 20,000 USD in return for issuing a liquor license to a private entrepreneur.¹⁵⁴ While gambling has been officially banned in Ukraine since 2009, gambling halls exist in almost every city street.¹⁵⁵

Ukraine's oil and gas permits are probably most exposed to corruption, due to the industry's highly lucrative nature. Ukraine's oil and natural resource extraction market has been shared between politicians and oligarchs, and traditionally remained closed to domestic and international competitors.^{156,157} For instance, as of February 2018, Ukraine had issued 474 permits for the use of oil and gas subsoil fields.^{158,159} While over 70 percent of private companies own only one permit each, almost all of the remaining shares of permits are concentrated in the hands of 14 companies, all of which are controlled by the same person.^{160,161} Additionally, Ukraine's State Service of Geology and Mineral Resources (State Geological Service) made the process of obtaining new oil and gas licenses excessively difficult and lengthy, smothering any new companies from competing in the market.¹⁶² While new players are blocked from entering the market, established companies are allowed to hoard these scarce licenses without any plans to undertake operation and production.¹⁶³ These anti-competitive practices are not only corrupt, but also detrimental to Ukraine's energy security, which has already been under considerable Russian interference.¹⁶⁴

The regulation and issuance of oil and gas licenses are often abused by officials, ignoring institutional and legislative requirements. In 2015, an oil depot of a company owned by the former minister of energy and coal, Eduard Stavytsky, exploded with one of the biggest fires in Ukraine's recent history.¹⁶⁵ Investigations after the fire revealed that the minister's company had been operating the oil depot without the necessary permits.¹⁶⁶ A potential reason behind this impunity may be that the State Geological Service has been vulnerable to political pressure and resistant to reform. In 2017, the head of the State Geological Service, Ostap Semerak, told the *Kyiv Post* that, despite his formal authority, he did not have the power to press the agency to issue more licenses or open its geological data for public auction.¹⁶⁷ Indeed, the State Geological Service did not issue a single new license in 2017.¹⁶⁸ It appears to Semerak that, rather than the formal institutional structure, the only way to influence the State Geological Service is political pressure.¹⁶⁹

To alleviate these issues, in 2018, the Ukrainian parliament passed a law that reduced the number of approvals and permits required for oil and gas production.^{170,171} This simplification is undoubtedly encouraging progress. However, the effectiveness of its implementation is still yet to be seen. There are also legislative actions in other fields, such as business registration, that are intended to cut down the licensing requirements in recent years, but it is unclear how much these statutes can free the licensing process from undue political influence.

FINANCIAL MANAGEMENT

Ukraine maintains a complicated web of government agencies that lack both well-maintained records of financial flows and effective financial accountability mechanisms. The public sector is often not able to keep track of how public funds are being spent and for what purposes, which enables officials to expropriate government budget as slush funds.¹⁷² Additionally, the government lacks the capacity to monitor the financial activities of private enterprises and ensure that the appropriate taxes are paid, which results in large sums of tax evasion and falsification.¹⁷³ Without access to accurate accounting information, identifiable paper trails, and the technical ability to independently evaluate these sophisticated records, Ukrainian taxpayers' money is more easily siphoned off into politicians' and private companies' accounts through illicit activities.^{174, 175}

Partially due to the lack of institutional capacity to track financial flows within the government, prominent officials are able to embezzle enormous amounts of public funds. Raisa Bogatyrova, former minister of health before President Yanukovich was ousted in 2014, embezzled 6.5 million UAH state funds through the medical procurement process.¹⁷⁶ A cohort of several ministers and a fuel and energy oligarch siphoned more than 1 billion UAH from state enterprises and used a significant amount of the stolen funds to hire paid thugs known as "titsuhki" to suppress the Euromaidan Revolution.¹⁷⁷ Even officials of anti-corruption institutes and the Tax Ministry were found to have taken money from the state. A former top official of the National Agency for Preventing Corruption, Tetiana Shkrebko, and the tax and revenue minister, Oleksandr Klymenko, were sentenced in 2016 for embezzling 3 billion UAH using their offices.¹⁷⁸ The leader of these corrupt ministers, then-president Yanukovich, was estimated to have funneled around 70 billion USD out of Ukraine's government budget in collusion with his close circle of corrupt colleagues, leaving the state treasury virtually dry after he fled out of Ukraine.^{179,180,181} Outside of Yanukovich's 140 hectare, 40 billion USD estate, very little of the stolen funds have ever been recovered.¹⁸²

In addition to the challenges in regulating its own officials' appropriation of state funds, the Ukrainian government also faces difficulties in monitoring private companies' financial flows, which would enable it to more effectively combat tax evasion and the falsifications of income documents. Serhiy Kurchenko, the fugitive oligarch who dominated the oil and fuel industry, systematically evaded millions of dollars in taxes with the help of government officials.^{183,184} One of Kurchenko's schemes was to charge sales tax on all the gas he sold, but he never passed on any of the taxes to the government.¹⁸⁵ Another one of his illicit business practices included creating fictitious export transactions using offshore companies, when in fact no gasoline was exported, and no customs duties or taxes were paid.¹⁸⁶ Sometimes even the registered addresses of companies were false. Plagued by these tax evasion schemes, the government was unable to effectively verify or regulate the private companies' illicit conduct.

In 2015, Ukraine passed a series of legislative amendments to address these corruption issues in financial management from a systematic level. This included amendments to the Budget Code and Tax Code, which increased the internal communication and coordination among ministries and strengthened data disclosure requirements as well as pricing control.¹⁸⁷ The Ukrainian parliament also amended the Procurement Law which required the implementation of e-procurement, as discussed earlier in this chapter, and significantly improved the procedural requirements of competitive bidding.¹⁸⁸ The European Union (EU) has also been working with Ukraine's Ministry of Finance to improve its financial management capacity.

However, these reformative efforts stayed mainly on the strategic level, and additional actions are needed to fully implement these legislative designs. The issue of uncollected tax debts still existed after the reform initiatives. By August 2017, Ukrainian businesses owed 76 billion UAH (2 billion USD) to the state, which accounted for about 10 percent of Ukraine's 2017 budget.¹⁸⁹ According to a 2018 report of *Spiegel Online*, a large German news magazine, Ukraine lost up to 750 million euros in taxes annually due to tax-evasion schemes.¹⁹⁰ Moreover, senior officials are still being implicated in tax-evasion schemes after the legislative reforms.¹⁹¹ The head of the State Fiscal Service, which was tasked with fighting tax and customs crimes, was criminally charged for unlawfully allowing a state-owned conglomerate to delay tax payments, causing a loss of 2 billion UAH (74 million USD) tax revenue.¹⁹² A fugitive lawmaker who was involved in the case claimed that the delayed tax payments were used to finance former president Poroshenko's political campaigns.¹⁹³ However, this charge was unsuccessful due to a lack of hard evidence.¹⁹⁴ Ironically, to support his presidential election campaign in 2019, Poroshenko signed a new tax law aimed at helping Ukraine recover an estimated 40–50 billion USD lost tax revenues per year.¹⁹⁵ How effective this new legislation is, and whether it will prove to be different and more effective than past legislative actions, remains to be seen.

HUMAN RESOURCES MANAGEMENT

Ukraine's traditionally bloated, inefficient bureaucracy suffers from poorly equipped bureaucrats, many of whom occupy positions that perform duplicative functions.¹⁹⁶ While the legacy of the chronically inefficient Soviet Union was certainly a contributor to this state of affairs, this redundancy is also partially the result of corrupt hiring practices.¹⁹⁷ The informal system of political influence negatively affected the hiring, firing, promotion, and management of public officials.¹⁹⁸ Politicians and oligarchs ensured that candidates aligned with their factions were promoted to prominent positions, whether with bribery or coercion, so that the strategically placed loyalists could protect the cohort's interests.¹⁹⁹ Officials who were outside of the inner circle or from opposing circles could be fired or investigated as a result of power struggles, regardless of their competence.²⁰⁰ As politicians rose and fell out of favor, their associates and loyalists' positions waxed and waned with them.²⁰¹ While the faces would change, the corrupt scheme of political appointments did not change.

Public offices were handed out as rewards for obedience and loyalty without adequate institutional shields against improper meddling. In 2002, Viktor Shokin made an unfathomable leap in his career when he was promoted from a minor investigator to the deputy prosecutor general of Ukraine.²⁰² The prosecutor general who issued that hiring decision later revealed that he only hired Shokin after serious lobbying by Petro Poroshenko, a minor oligarch and

then-deputy leader of a parliament faction.²⁰³ Following the Orange Revolution, Poroshenko took control of Ukraine's National Security Council, and Shokin was installed as the deputy prosecutor general for the second time.²⁰⁴ A decade later in 2014, when Poroshenko emerged from the Euromaidan Revolution as the president of Ukraine, Shokin was recruited as an unemployed pensioner to the deputy prosecutor general position, for the third time, and was then promoted to prosecutor general a year later.²⁰⁵ In 2015, David Sakvarelidze was appointed to be the deputy prosecutor general of Ukraine.²⁰⁶ However, Sakvarelidze quickly infuriated Shokin and was quickly fired after in 2016.²⁰⁷ Shokin also uses his official power to punish this "uncooperative" deputy by open multiple criminal cases against Sakvarelidze, accusing him of illegal conducts and embezzling funds provided by the US. All of these cases were later determined to be unfounded.^{208,209} The three inconceivable leaps of Shokin's career serve as an example of how promotions were exploited as tools to reward loyalty rather than professional performance.

Determined to tackle the corruption issue in the government's hiring and management of officials, in June 2016, Ukraine's Cabinet of Ministers approved a Public Administration Reform Strategy for 2016–20, as well as a plan of its implementation.^{210,211} This reform strategy viewed human resources (HR) reform as a critical component.²¹² The primary focus of the reform included reducing the number of redundant government employees, increasing officials' wages to competitive labor market levels, and introducing modern personnel management tools.^{213,214} These reforms reduced the administrative burden on citizens and improved transparency in government hiring by listing all available vacancies on the official government recruitment website.²¹⁵ However, the effectiveness of these advancements has been limited somewhat by continued political interference in hiring results and the promotion of officials already within the government.

To further reduce the room for corruption in the government's HR management, Ukraine launched an integrated electronic hub in 2019 called the Human Resources (and Payroll) Management Information System (HRMIS), which automates a number of HR functions and analytical tools.^{216,217} With technical and financial support from the EU and World Bank, HRMIS can track, store, and analyze government information on HR recruitment, case management, roster maintenance, etc.²¹⁸ The Ukrainian government hoped to use HRMIS to replace the traditional paper-based workflow of HR systems amongst all governmental entities, which would significantly reduce the opaqueness in the government's HR decision-making processes, reducing the opportunity for corrupt practices in personnel management.²¹⁹ However, the extent of HRMIS's effectiveness remains to be seen.

After President Volodymyr Zelensky was elected in 2019, he signed an amendment simplifying the procedure for hiring and firing government officials.²²⁰ This move generated heated debates and mixed reactions among both policymakers and the public.²²¹ Supporters of the law believed that it would reduce the procedural obstructions to firing corrupt and low-skilled government officials, whereas opponents of the bill argued that the statute rendered government employees more vulnerable to political pressures as they could be fired with even less probable cause.²²² While the impact of this change requires more time to fully manifest, removing more checks from the already vulnerable hiring and firing procedures is likely to serve the elites' interests and be exploited as a tool to further centralize power rather than restrain power.

MANAGEMENT OF INFORMATION

Ukraine's government has traditionally been mysterious to most outsiders and independent monitoring organizations, which allowed Ukraine's ruling elites to thwart transparency efforts and protect their business interests using state institutions.²²³ The lack of access to decision-making processes and critical government documents contributed greatly to Ukraine's accountability and rule of law problems. In a 2015 report, the United Nations High Commissioner for Human Rights described Ukraine as having an "accountability vacuum" in its government, and a "widespread perception of impunity" among its officials.^{224,225}

After the 2014 Euromaidan Revolution, the newly elected government introduced the Open Data Law, which requires all government entities to make public information accessible in the form of open data for the wider public to view, share, and reuse for any purposes, without restrictions.²²⁶ One of the primary focuses of this open data reform is the transition to e-governance, which encompasses everything from creating electronic platforms for citizens to engage in policy formulation, to improving access to public service delivery through online programs.²²⁷ The State Agency for eGovernance of Ukraine was created especially for the purpose of maintaining effective open data programs, under which national and local governments can publish data publicly.²²⁸ The e-governance initiative utilized innovative data technologies to increase public-sector accountability and reduce corruption.²²⁹

Continuing the string of innovative approaches that use technology to increase data transparency in the public sectors, Ukraine launched an openly accessible electronic asset declaration system in September 2016.²³⁰ Public officials are required to disclose their incomes and assets via this public system, which was designed to reveal conflicts of interest, invite public scrutiny of official earnings, and assist Ukraine's newly created anti-corruption agencies in its investigations.²³¹ To ensure the integrity of the e-declaration system, its software development was funded by the Danish Ministry of Foreign Affairs and supervised by quality assurance specialists and representatives from the World Bank and the UNDP.²³² In October 2018, the system's managing organ, the National Agency on Corruption Prevention, introduced a verification software that automatically verifies uploaded electronic declarations.²³³ This verification software can significantly reduce the time needed to review e-declarations, flag any inconsistencies or false information, and notify anti-corruption agencies when investigations may be worthwhile.²³⁴

This suite of e-governance reforms has substantially improved Ukraine's transparency overall. The institutionalization of open data resulted in the disclosure of important government datasets, such as those on public spending, company registrations, court decisions, and the beneficial owners of corporate entities.²³⁵ By 2018, Ukraine's national Open Data portal offered over 30,000 datasets.²³⁶ The 2016 United Nations e-Government Development Index indicated that Ukraine improved 25 placements over its 2014 ranking, with significant enhancement in e-government and e-participation.²³⁷ The Global Open Data Index, published by the Open Knowledge Foundation, listed Ukraine among the top 50 most open nations, ranking it at 31st in the world.²³⁸

The introduction of an e-declaration system also brought considerable improvements to the transparency and integrity of public offices. In March 2017, and again in March 2018, about 1 million civil servants submitted their declarations, which has enabled anti-corruption agencies, law enforcement bodies, journalists, civic groups, and ordinary citizens to hold public officials accountable for their actions.²³⁹ A 2017 UNDP survey indicated that nearly three quarters of

Ukrainians have positive or somewhat positive opinions about the e-declaration system, and two thirds of respondents expect the e-declaration to improve the situation in the fight against corruption in Ukraine within the coming three to five years.²⁴⁰ A majority of participants of the e-declaration system believe it will lead to more individuals being held accountable for corruption crimes.²⁴¹ The adoption of the e-declaration system is an effective first step in increasing the difficulties of corruption and improving public faith in public officials.

Nevertheless, despite this overwhelming public support, elements of Ukraine's leadership have gone out of their way to undermine the effective operation of the e-declaration system.²⁴² One effort has attempted to undermine the independent technical audit of the e-declaration system through discriminatory selection criteria that prevented reputable international auditors from participating.²⁴³ The other is the attempt to exempt a substantial proportion of state officials from the e-declaration requirement.²⁴⁴ Under the veil of protecting national interests, some parliament members proposed legislative amendments that would exempt nearly all law enforcement officials and the employees of numerous other state agencies from the e-declaration requirement, rendering the e-declaration requirement toothless.²⁴⁵ The amendments also proposed disclosing officials' assets via paper forms to their leadership, which would create the additional risk of supervisors blackmailing employees.²⁴⁶ While this draft law was eventually removed from consideration, there is no guarantee that a similar legislative effort would not be successful in the future.²⁴⁷ Finally, the implementing agency of e-declaration, the National Agency for Preventing Corruption, is notably loyal to the ruling elites and was involved in a number of scandals, as well as the politically motivated persecution of activists.²⁴⁸

LEGAL EDUCATION

Ukraine's legal education system has been plagued by rampant corruption in law school admissions.^{249,250} After the 2014 Euromaidan Revolution, Ukraine amended its legal frameworks to ensure better quality assurance in higher education.²⁵¹ However, Ukraine's legal education system still suffered from various corrupt admission practices, which has resulted in a surfeit of law schools flooding the legal market with unqualified applicants. As a result, there are nearly 300 licensed law schools in Ukraine, and more law school students graduate each year than finance, economics, agro-engineering, and computer science graduates combined.^{252,253} Only one in seven of these law school graduates were able to find employment in the legal profession.²⁵⁴

Ukraine sought to address this lack of rigorous, standardized admissions criteria and rampant corruption in law school admissions by creating a merit-based and transparent admission process.²⁵⁵ Ukraine's Ministry of Education and Science (MOE) and Ministry of Justice, the US Agency for International Development (USAID), and the Organization for Security and Cooperation in Europe (OSCE) project coordinator collaborated to develop and implement a Mandatory, External, Independent, Standardized Entrance Exam (MEISEE) for master's degree programs in law.^{256,257,258,259} When MEISEE was first introduced in 2016 as an experiment, only nine law schools opted to replace their internal admission exams for MEISEE.^{260,261,262} Each year after its introduction, MEISEE improved its rigor, comprehensiveness, and user-friendly design. By 2017, MEISEE was adopted nationwide and became mandatory for admission to master's degree programs in law.²⁶³

In addition to increasing the standards for law school admissions nationwide, MEISEE provides a transparent admission standard for Ukraine's legal education and provides law students with a merit-based competition platform that is relatively resistant to corruption. The minister of MOE, Liliia Hrynevych, praised MEISEE for enabling evidence-based policymaking within the MOE and paving the way to create a corruption-free admission and graduation exams for Ukraine's higher education sector as a whole.²⁶⁴ It also limited the potential for embezzlement and other illicit practices by transitioning from providing public funding to law schools to directly providing tuition fee assistance to students based on public information of academic performance.²⁶⁵ Due to the success of MEISEE, the MOE extended the foreign language component of MEISEE to other graduate programs in 2018.²⁶⁶ Over 30,000 applicants in 2018 and over 55,000 applicants in 2019 took the MEISEE as a part of their admission requirements.^{267,268}

CONCLUSION

Ukraine has made extraordinary progress in the fight against public-sector corruption by improving the transparency, accountability, and effectiveness of its government in many different fields, ranging from public procurement reform to new asset declaration processes. In many of the most successful instances, Ukraine blended modern technologies with sound policy to detect and prevent corrupt activities. Furthermore, with the establishment of a network of anti-corruption agencies that are designed to hold public officials accountable and promote the rule of law, former regimes' corrupt officials are gradually being investigated and punished for their abuse of power. Despite many setbacks, challenges, and obstacles throughout its post-Soviet history, Ukraine continued to make sustained, incremental progress on its goal of creating an honest, accountable, and democratic government for future generations. While this venture is full of uncertainties, and may find itself confronted with substantial resistance in the future, the post-Euromaidan reforms give us hope that Ukraine is on the right path.

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