INSTITUTIONAL MODELS OF ANTI-CORRUPTION GOVERNANCE: A RETROSPECTIVE ANALYSIS OF EFFECTIVE PRACTICES

MODELOS INSTITUCIONAIS DE GOVERNANÇA ANTICORRUPÇÃO: UMA ANÁLISE RETROSPECTIVA DE PRÁTICAS EFICAZES

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Abstract
Objective: The study aims to identify key principles and tools decreasing corruption and promoting greater transparency and accountability of public institutions. The authors analyze the examples of Scandinavian, Asian, and other countries. Singapore and Botswana, which have earned international recognition for their effective implementation of anti-corruption policies, are studied in detail. Methods: The authors utilize a wide range of methodological techniques. This research is inconceivable

Resumo
Objetivo: O estudo visa identificar princípios e ferramentas-chave para a redução da corrupção e a promoção de maior transparência e responsabilização das instituições públicas. Os autores analisam exemplos de países escandinavos, asiáticos e outros. Singapura e Botsuana, que obtiveram reconhecimento internacional pela implementação eficaz de políticas anticorrupção, são estudadas em detalhe. Métodos: Os autores utilizam uma ampla gama de técnicas metodológicas. Esta

without comparative legal and legal history analysis, which uncovers general trends and specific features in anti-corruption strategies. Results: Based on an analysis of the legislation, institutional reforms, and social initiatives introduced in the examined countries, the authors offer recommendations on adapting successful practices in countries with high levels of corruption. Particular attention is paid to the role of specialized anti-corruption bodies, such as the Independent Commission Against Corruption in Hong Kong, the Corrupt Practices Investigation Bureau in Singapore, and the Directorate on Corruption and Economic Crime in Botswana. The key factors behind the success of these institutions are their independence, broad mandate, and active engagement with civil society and the media. Conclusions: The study emphasizes the importance of a comprehensive approach to implementing anti-corruption policy, including legislative and cultural changes. The findings demonstrate the need for international cooperation and exchange of best practices in anti-corruption policies and their practical implementation. In the age of digitalization, modern technologies are becoming increasingly important and will soon become an instrumental part of the fight against corruption.

Keywords: Corruption. Anti-Corruption. Legal Policy. Anti-Corruption Policy. Countering Corruption.

pesquisa seria inconcebível sem a análise comparativa da legislação e da história jurídica, que revela tendências gerais e características específicas nas estratégias anticorrupção. Resultados: Com base na análise da legislação, das reformas institucionais e das iniciativas sociais implementadas nos países examinados, os autores oferecem recomendações sobre a adaptação de práticas bem-sucedidas em países com altos níveis de corrupção. Dá-se especial atenção ao papel de órgãos anticorrupção especializados, como a Comissão Independente Contra a Corrupção em Hong Kong, o Departamento de Investigação de Práticas Corruptas em Singapura e a Diretoria de Combate à Corrupção e Crimes Econômicos em Botsuana. Os principais fatores que contribuem para o sucesso dessas instituições são sua independência, amplo mandato e engajamento ativo com a sociedade civil e a mídia. Conclusões: O estudo enfatiza a importância de uma abordagem abrangente para a implementação de políticas anticorrupção, incluindo mudanças legislativas e culturais. Os resultados demonstram a necessidade de cooperação internacional e intercâmbio de boas práticas em políticas anticorrupção e sua implementação prática. Na era da digitalização, as tecnologias modernas estão se tornando cada vez mais importantes e em breve se tornarão parte fundamental do combate à corrupção.

Palavras-chave: *Corrupção. Anticorrupção. Política Jurídica. Política Anticorrupção. Combate à Corrupção.*

1 INTRODUCTION

Corruption has been a major negative factor in the development of society and the state since ancient times. As early as in ancient states, realizing the danger of corrupt practices, authorities began to take various steps and develop programs to eradicate this pernicious act.

A joint study by P. Owen from New Zealand and T. Vu from the United Kingdom, which examined corruption in various states from 3500 BC to 2000 AD, found a correlation between the state's age and its success in the struggle against corruption. The researchers suggest that young states and countries with the longest histories are less affected by corruption than states in the middle of this scale, which are the most susceptible to corruption (Owen & Vu, 2022). Although this study is of great interest, we

struggle to agree with all the findings of our colleagues. All states have passed and are passing through different stages in their development, and the level of corruption, attitudes to it, and methods of countering it are different at each stage. For example, the level of corruption during China's most active anti-corruption phase under Mao Zedong in 1951-1952 was extremely low and generally remained so until 1965.

2 METHODS

The methodological basis of this study covers a wide range of modern methods, including general scientific, special scientific, and special legal. The study of effective practices in implementing anti-corruption policies, especially in retrospect, requires more than one approach (which might make it challenging to achieve research goals in the study of such a multifaceted phenomenon as anti-corruption law policy). Our methods were determined by the goals and objectives of our research. The key role is played by systemic-functional methods to study institutions created in the framework of anti-corruption regulation.

The use of special legal science methods, such as the formal legal, comparative legal, and state-legal modeling methods, allowed us to develop the data collection methodology to assess corruption, which included: a review of international anti-corruption studies; the selection of case studies in the humanities and legal sciences; the study of experience and comparative analysis of the most effective practices in combating corruption; analysis of law enforcement practice, including court decisions related to acts of corruption; analysis of criminal and other statistics on corruption-related crimes; analysis of legislative acts and strategic planning documents shaping the anti-corruption law policy; the development and implementation of systems for monitoring corruption and the effectiveness of anti-corruption policy implementation in various states.

An important part of our research methodology was played by the legal history method. The study of existing practices in implementing anti-corruption law policies from a legal history perspective helped us achieve one of the main research objectives: to study the applicability of the most effective and well-proven anti-corruption practices.

3 RESULTS

In recent years, several Northern European countries, New Zealand, and Singapore have taken the lead among the countries with the lowest levels of corruption. These outstanding results have been confirmed by researchers and public organizations. An annual ranking by one such organization demonstrates that these countries have adopted sustainable policies to eradicate this phenomenon poisoning the normal life of the state and society. Nevertheless, even these countries are far from a complete victory. With a maximum of 100 points, the leaders score 87-90 points at best, which demonstrates that much more effort is needed to eradicate corruption (if that is even possible). Even the least corrupt countries often witness scandals with criminal overtones involving either companies participating in corruption crimes abroad or corrupt practices carried out by major politicians, often disguised as legitimate lobbying.

Another important component, including in Western countries, is nepotism. Even in countries that are absolute leaders in the fight against corruption, it is difficult to imagine taking up certain positions without the support of respected and reputable references. For example, when choosing between several candidates for a position in a law firm, the one that provides a letter of recommendation from a judge will have an advantage, while personal merits and qualities will take a back seat.

The Gallup Foundation's survey of residents of these states regarding corruption of the highest authorities shows interesting results. 14% of the surveyed Swedes (5th place in the Corruption Perceptions Index), 19% of Danes (1st place), 25% of Swiss (7th place), 26% of Finns (3rd place), 27% of New Zealanders (2nd place), 30% of Norwegians (4th place), 38% of Germans (9th place), 40% of Netherlanders (8th place), and 40% of Uruguayans (14th place, the leader in the Eastern Hemisphere) believe that their countries suffer from widespread corruption in public administration (Navasardova et al., 2025; Pyman et al., 2018).

Nonetheless, the successful efforts of these countries in the struggle against corruption cannot be denied. The measures taken by the states can be divided into two categories: the fight against corruption offenses and preventive measures. The approaches can be different: tough, as in some Arab countries, liberal, as in Scandinavia, or mixed, as in Singapore.

Singapore has always been held up as a textbook example of anti-corruption.

Today, Singapore is a small state with a developed economy. However, back in 1965, when it gained independence, Singapore was a backward, poor, and very corrupt state. It is the fight against corruption that is responsible for the rise of this country. The head of government, Lee Kuan Yew, took several important measures that solved the state's problems. First, the legislation was revised and simplified. Complex and ambiguous wording that allowed both the executive and the judiciary grounds for abuse of power was eliminated. In addition, the legal technique of legislation was changed, and procedures requiring the intervention of officials were abolished.

Furthermore, the work of judges and civil servants began to be remunerated many times higher, and highly qualified personnel were attracted to this line of work.

After these measures, the Singaporean authorities were able to move on to the next stage of the fight against corruption — eradicating organized crime. Relatively liberal measures were followed by extremely strict ones. Criminals were dealt with, among other things, by introducing the death penalty in the form of executions by firing squads. Singapore gained independence by withdrawing from its federative relationship with Malaysia, considering the Chinese population to be disadvantaged in such a union. The Malays, on the other hand, formed the backbone of Singapore's corrupt law enforcement agencies through kinship and clan ties that covered up the corrupt practices of the diaspora. The anti-corruption policy called for the dismissal of Malays and the recruitment of Chinese (especially in the police), which yielded positive results. However, the negative consequences of such actions could not be avoided either.

Finally, an independent commission was established to investigate economic crimes committed by politicians and high-ranking officials. Even Lee Kuan Yew's relatives could not escape the investigations of this commission. Remarkably, more than half of the state's ministers and other high-ranking officials were convicted of corruption offenses. By 1990, when Lee Kuan Yew resigned, the level of corruption in Singapore had become so low that the state was ranked among the world's leaders, where it remains to this day.

Another textbook example of a successful anti-corruption policy is Hong Kong, now known for its strict legal framework and institutional mechanisms. However, that was not always the case. In the 1960s, Hong Kong was a region plagued by rampant corruption. The establishment of the Independent Commission Against Corruption (ICAC) in 1974 was a turning point in the territory's battle against corruption, reflecting

a strong commitment to legal reform that would result in triumph over corruption (Quah, 2006).

The Commission's success can be attributed to its operational independence, broad investigative powers, and an integrated approach that combined law enforcement with prevention and public awareness (Manion, 2004; Smirnov et al., 2023). The commission follows a three-pronged strategy: investigation, prevention, and education. Acting as an independent body, the Commission has powers inherent in law enforcement agencies. It can carry out searches, arrests, and other procedural actions. This body also provides advisory services to organizations and educates citizens (Khabrieva, 2021). As a result, Hong Kong has joined the ranks of states and territories with the lowest number of corruption phenomena. Intolerance of corruption has become a hallmark of the now special administrative region of China (Lo, 2016).

The country standing out among African states as the most successful in combating corruption on the continent is Botswana. This state also emerged in the wake of the collapse of colonial regimes in 1966. Until the 1970s, Botswana did not have a developed economy, but the situation changed drastically when diamonds were discovered on its territory. Until the beginning of the 21st century, the state was facing significant unemployment rates and substantial economic problems and was considered one of the countries with a high level of corruption. President Festus Mogae, who came to power in 1998, approved a new anti-corruption policy with an important role played by the Directorate of Corruption and Economic Crimes, an anti-corruption agency that had been created a few years earlier and given considerable powers to investigate corruption offenses and played a major role in the prevention of corruption.

The reference point for Botswana's authorities was Hong Kong, which had also implemented a successful anti-corruption project, largely based on Singapore's model, which was not alien to the Cantonese. The Directorate is less independent than its Hong Kong counterpart, the Independent Commission Against Corruption. In particular, the head of the Directorate is appointed by the head of state (Kuris, 2013).

Botswana's success was aided by its independent judiciary, which was not as heavily influenced by executive authority as, for example, in neighboring South African states.

A meritocratic approach made it possible to tackle corruption in the civil service. Individual merit, irrespective of one's background, family ties, wealth, and other factors,

is given priority in deciding appointments to important public sector positions.

Botswana's anti-corruption policy implementation mechanism involves transparency and the participation of civil society in policymaking, such as budgeting, development planning, and setting key public policy priorities (Mukhametgaliyeva et al., 2024; Mungiu-Pippidi, 2013).

Botswana's success is striking because it shatters stereotypes about the likelihood of a corruption-free state in a relatively poor country. Nevertheless, the achievements of this state largely depend on the political will of its leaders and do not have the durability that the strategies developed in several Asian states can boast.

4 DISCUSSION

Our analysis of states that have overcome extreme levels of corruption and made a confident leap in the corruption rankings leads us to conclude that corruption is not an undefeatable phenomenon.

The effectiveness of anti-corruption policy implementation in different states often depends on the will of a particular person (it may even be an authoritarian ruler), the will of the majority of the population striving to build a quality civil society and a true rule of law, the intervention or non-intervention of other states, and the use of practices developed by other states.

The rankings of corruption in countries and attitudes toward it are often biased. In many respects, they depend on geopolitical and ideological factors. Thus, Western rankings of state corruption usually name those countries most corrupt that are not perceived as allied to Western countries. This ignores the reality of extreme corruption in countries under the ideological and geopolitical tutelage of Western states, and their place in the ranking is often higher than the states that are making efforts to defeat one of the most ancient and terrible acts — corruption crimes. Moreover, even international non-profit organizations in such mentee states fail to include even the most blatant cases of corruption on the part of heads of state and high-ranking officials in their reports.

It is extremely difficult to form a quality anti-corruption policy and mechanisms for its implementation without referring to the experience of some countries. Some examples may well represent the very element that other countries have been looking for for so long.

Recent studies by Russian researchers show that different population categories hold different opinions about the methods used to combat corruption (Apkaev, 2022; Mukhametgaliyeva et al., 2024; Savchenko et al., 2023).

5 CONCLUSIONS

A state's anti-corruption policy should consider many factors to successfully realize its goals and priorities. There is no single approach that can successfully solve all problems in the field of anti-corruption alone. It appears to be necessary to use a combination of methods while necessarily studying the experience of other countries. Retrospective analysis reveals similarities in the seemingly completely different countries with completely dissimilar forms of government, models of interaction between the levels of government and bodies representing different branches of state power, and even geographical and historical elements. It is not entirely impossible, however, to find a commonality in this array of differences that will potentially rid states of the terrible disease of corruption in the future.

Finally, we should note that in the near future, innovative approaches such as the use of digital technology to increase the transparency of government processes and reduce bureaucratic barriers and the use of electronic procurement systems, income declarations, and automated systems to monitor public expenditures and conduct anti-corruption expertise of regulatory legal acts and draft regulatory legal acts will be used more actively in forming anti-corruption strategies and implementing anti-corruption policies.

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Authors' Contribution

All authors contributed equally to the development of this article.

Data availability

All datasets relevant to this study's findings are fully available within the article.

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