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Models of Combating Corruption: National and Foreign Experience

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Abstract
This article provides a comparative legal analysis of the theoretical and methodological foundations of anti-corruption efforts, contemporary national and foreign models, and their institutional and legal characteristics. In particular, it examines the effectiveness factors underlying the anti-corruption mechanisms established in Singapore, Hong Kong, the United States, and European countries. The study also analyses the reforms being implemented in Uzbekistan, national anti-corruption legislation, and the priority areas of state policy in this field. Based on an assessment of the opportunities and limitations associated with incorporating foreign experience into the national legal system, the article develops scholarly proposals aimed at improving comprehensive mechanisms for preventing corruption.

Keywords: corruption, combating corruption, national model, foreign experience, transparency, accountability, public administration, compliance control, public oversight.

Introduction

Corruption is one of the most serious threats to modern statehood, a democratic society governed by the rule of law, and sustainable socio-economic development. It undermines the effectiveness of public administration, weakens the rule of law, leads to the misallocation of economic resources, and adversely affects the investment climate. Consequently, combating corruption is no longer merely a task within the remit of law enforcement agencies; rather, it has become a strategic priority of state policy.

The United Nations Convention against Corruption identifies preventive measures, criminal law mechanisms, and international cooperation as interrelated areas essential to the development of effective anti-corruption policies [1]. This approach implies that combating corruption should not be limited to imposing penalties for offences already committed; it must also address the institutional, economic, and social factors that create favourable conditions for corrupt practices.

The relevance of this issue stems from the fact that different countries have developed distinctive models for combating corruption, the effectiveness of which depends directly on political will, the independence of public institutions, law enforcement practices, civil society participation, and the level of development of public oversight mechanisms. From this perspective, the comparative

examination of foreign models and the identification of their elements suitable for adaptation to the national public administration system are of considerable academic and practical importance.

An anti-corruption model may be defined as an interconnected system of legal, organisational, institutional, economic, and social mechanisms designed to prevent, detect, restrict, and eliminate corrupt practices within the state and society. Academic literature identifies several principal approaches to combating corruption:

First, the **repressive model**, which prioritises the detection, investigation, and punishment of corruption-related offences, ensuring the inevitability of legal liability. This model relies on the effectiveness of law enforcement agencies, specialised investigative powers, and judicial oversight.

Second, the **preventive model**, which focuses on mitigating corruption-related risks before they materialise. Under this approach, particular importance is attached to ethical standards for civil servants, the regulation of conflicts of interest, asset and income declarations, transparency in public procurement, and the simplification of administrative procedures.

Third, the **institutional model**, which is based on establishing effective cooperation among specialised anti-corruption authorities, internal control units, independent audit institutions, and the judicial system.

Fourth, the **social-democratic model**, which envisages the active participation of civil society institutions, mass media, academic institutions, and the public in combating corruption.

It would be inappropriate to apply these models in complete isolation from one another. Corruption is a complex socio-legal phenomenon, and effectively addressing it requires a comprehensive and systemic approach. In the institutional formula of corruption proposed by Robert Klitgaard, high levels of monopoly and discretionary power, combined with insufficient accountability, are identified as factors that increase corruption risks. The author theoretically substantiates the need to clearly define the powers of public authorities, ensure transparency in decision-making, and strengthen the accountability of public officials as essential measures for combating corruption [2]. International experience demonstrates that there is no single universal model for combating corruption. Each country has developed appropriate mechanisms based on its political and legal system, administrative traditions, and socio-economic conditions.

The Singapore Model. Singapore is widely recognised as one of the most institutionally robust models of combating corruption, founded on stringent law enforcement practices. The Corrupt Practices Investigation Bureau (CPIB), established in 1952, plays a significant role in detecting and investigating corruption-related offences. The principal features of Singapore's experience include zero tolerance for corruption, the professional responsibility of public officials, the simplification of administrative procedures, and the provision of adequate remuneration for public servants. Importantly, anti-corruption efforts are directed not only towards punitive measures but also towards eliminating the underlying conditions that facilitate corrupt practices.

The Hong Kong Model. Hong Kong's Independent Commission Against Corruption (ICAC) was established in 1974, and its activities are based on three principal pillars: the detection and investigation of corruption, corruption prevention, and public education. The distinctive feature of this model is that combating corruption is not confined to the law enforcement activities of a

specialised authority. Rather, particular attention is devoted to reducing corruption risks within public institutions, fostering legal awareness among the population, and establishing continuous engagement with the public. Hong Kong's experience demonstrates the importance of combining institutional independence with preventive measures in the fight against corruption.

The United States Model. In the United States, anti-corruption efforts are based on a multi-institutional and multi-level oversight system. Federal law enforcement agencies, independent inspectors general, courts, congressional oversight, public auditing mechanisms, and freedom of information instruments operate in coordination with one another. The Foreign Corrupt Practices Act (FCPA), adopted in 1977, constitutes an important legal instrument for prohibiting bribery of foreign public officials and ensuring compliance with accounting and internal control requirements within companies. The international significance of this legislation lies in its regulation of measures aimed at combating transnational corruption.

The European Model. In European countries, anti-corruption efforts are founded on the rule of law, an independent judiciary, transparency in public administration, and public oversight. In particular, in countries such as Denmark, Finland, and Sweden, the professionalisation of public service, broad access to information, institutional trust, and the accountability of public officials are considered important factors in reducing corruption risks. The Council of Europe's Group of States against Corruption (GRECO) serves as a monitoring mechanism for assessing the implementation of anti-corruption standards in member states and developing recommendations for improving legislation and institutional frameworks. Overall, international experience demonstrates that the principal characteristics of an effective anti-corruption model include the functional independence of specialised authorities, the certainty of punishment, professionalisation of public service, transparency in decision-making, and institutional guarantees of public oversight.

The National Anti-Corruption Model of Uzbekistan. In Uzbekistan, combating corruption has emerged as one of the priority areas of state policy. In recent years, extensive reforms have been implemented to strengthen and improve the legal and institutional foundations of this field. One of the key legal instruments in this area is the Law of the Republic of Uzbekistan No. ZRU-419, On Combating Corruption, adopted on 3 January 2017 [3]. This Law established the fundamental principles of state policy in combating corruption, defined the activities of authorised bodies, and provided the legal framework for cooperation between state institutions and civil society.

The establishment of the Anti-Corruption Agency of the Republic of Uzbekistan in 2020 marked an important milestone in the development of the national institutional framework. Its principal responsibilities include preventing corruption, formulating and implementing anti-corruption policies, assessing corruption-related risks in the activities of public authorities, and coordinating reforms in this field. One of the defining characteristics of Uzbekistan's national model is its commitment to integrating anti-corruption measures into all areas of public administration. In this process, particular importance is attached to introducing internal anti-corruption control (compliance control) systems in public authorities and organisations, conducting anti-corruption reviews of regulatory legal acts and their drafts, ensuring transparency in public procurement, and

expanding the provision of electronic public services. The institutional characteristics of the national model can be identified in the following areas:

Centralised coordination: ensuring the participation of a specially authorised body in the implementation and coordination of anti-corruption policies.

Institutional prevention: developing internal anti-corruption control systems within public authorities and organisations.

Digitalisation: reducing the human factor in public service delivery and administrative procedures while expanding electronic transparency.

Public oversight: supporting the anti-corruption activities of civil society institutions and mass media.

Legal liability: detecting corruption-related violations and applying appropriate legal liability measures.

Nevertheless, further improvements in the effectiveness of the national model require addressing several institutional and organisational challenges. In particular, it is essential to strengthen the practical impact of corruption risk assessment results within public authorities, improve mechanisms for identifying and resolving conflicts of interest, ensure legal protection for individuals reporting corruption, and enhance the effectiveness of public oversight. A comparative analysis of foreign models and Uzbekistan's national model reveals both certain commonalities and institutional and functional differences. In the Singapore model, the professionalisation of public service is a priority; the Hong Kong model emphasises the integration of prevention, investigation, and public engagement; whereas the United States model prioritises multi-level oversight and corporate compliance systems. In the European model, the rule of law, transparency, and institutional trust occupy a central position. Uzbekistan's emerging national model incorporates certain elements of these approaches while relying primarily on centralised coordination, institutional prevention, and digitalisation mechanisms.

Based on this comparative analysis, the following academic and practical proposals may be advanced to improve the anti-corruption system in Uzbekistan:

First, priority should be given to mechanisms for preventing corruption risks rather than relying predominantly on punitive measures. To this end, it would be appropriate to introduce regular corruption risk assessments within every public authority, together with specific measures and performance indicators designed to eliminate identified risks. When evaluating the anti-corruption activities of public authorities, it is necessary to rely not merely on the number of measures undertaken or violations detected, but also on outcome-oriented indicators, such as the reduction of corruption risks, improvements in the quality of public services, and increased public trust. Furthermore, institutional mechanisms for identifying and resolving conflicts of interest should be further developed, and effective implementation of ethical standards for civil servants should be ensured. Reliable mechanisms for protecting the rights, personal data, and legitimate interests of individuals reporting corruption must also be improved. Such measures would encourage greater public participation in combating corruption.

Second, it is advisable to strengthen transparency and gradually introduce digital auditing and automated corruption risk analysis mechanisms. The participation of civil society institutions, independent mass media, and academic research institutions in anti-corruption efforts should also be expanded. This is particularly important because sustainable social resistance to corruption cannot be established solely through legal sanctions. Rather, it requires the development of respect for the law, integrity, and personal responsibility as fundamental societal values.

Based on the findings of this study, it may be concluded that the prospective national model for combating corruption in Uzbekistan should be developed as a comprehensive framework integrating preventive, institutional, digital, and social mechanisms. Such an approach would not only facilitate the detection of corruption-related practices but also help eliminate the underlying causes that give rise to them. The principal criterion for assessing the effectiveness of anti-corruption efforts should not be the number of laws adopted or specialised bodies established. Instead, it should be measured by the extent of digitalisation and transparency in the activities of public authorities, the accountability of public officials, and the level of public confidence in the rule of law.

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