

Corruption prevention as a public administration improvement factor

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Abstract. Corruption remains a major challenge to good governance in countries. It reduces a country's economic development potential and the well-being of its citizens, which is why authorities are constantly looking for new ways to combat it. Therefore, it is necessary to assess the existing methods of fighting corruption and analyse the experience of other countries in this area. The research aimed to analyse the experience of Singapore, Finland, Denmark, South Korea, and Kazakhstan in the context of combating corruption and to formulate recommendations on their basis for the Republic of Kazakhstan. In the study, comparative law and legal modelling methods were utilised to analyse the differences in anti-corruption legislation and enforcement between Kazakhstan and other countries. The differences that exist in these states were described, as well as the reasons for achieving certain results in the fight against corruption, despite many common approaches (tightening legislation, digitalisation of government processes, development of ethical and cultural interactions in the country). Subsequently, an assessment was made of the opportunities for Kazakhstan to apply the methods actively used in Singapore, Finland, Denmark, and South Korea to its specific development. It was pointed out that it is worthwhile to implement extensive anti-corruption measures in all possible areas of the country, and that the policies applied by the authorities should be comprehensive. It will be useful for improving public policies to counteract unscrupulous behaviour on the part of public officials

Keywords: economic development; governance; public policies; efficiency of enterprises; investor confidence

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Introduction

Countering corruption is one of the key factors in improving good governance (Luna-Pla & Nicolas-Carlock, 2020). It includes several measures related to creating an environment in which it would be impossible or extremely difficult to form any action involving the misuse of public money or abuse of power. The reason for this is the variety of negative effects that corruption brings with it. The most obvious among them is the decline in the general level of the economic well-being of citizens, which arises from the fact that funds allocated from the budget to social areas are not used for their intended purpose. Moreover, qualified personnel in such conditions tend to go abroad, which reduces the efficiency of enterprises as well as the scientific and technological potential. However, there are other effects as well. For example, there is a deterioration of sentiment among the local population and a decline in trust among citizens. There is a decline in trust among citizens in state institutions, authorities, and the governance system as a whole. This can lead to a sense of hopelessness and apathy among the population, as well as a decrease in citizen participation in political life and public affairs (Mugellini *et al.*, 2021). In addition, it distorts the market conditions in the country, as individual businesses can profit from illegal contracts with government officials rather than from competitive advantages. Corruption also causes capital outflows from the country as it reduces investor confidence (Shahini, 2024). The quality of social programmes related to education or health is also deteriorating, which negatively affects human capital (Androniceanu *et al.*, 2022). It is worth noting that there are many negative effects of corruption, but not all of them, as in fact, their number is enormous. That is why it is necessary to consider and find measures to counteract unscrupulous behaviour by civil servants in different countries. The study is relevant for Kazakhstan in 2024 due to serious socio-economic challenges that require effective anti-corruption measures, including improving legislation and increasing transparency of public procurement. In the context of global economic instability, it is important to restore public trust in state institutions, taking into account new challenges in the fight against corruption and studying the successful practices of other countries, such as Singapore and Denmark.

As part of the research, it was important to assess the general features of Kazakhstan's modern development. This is how opportunities and problems in the country have been studied by O. Demenko (2021). The scientist considers the social features of the country's functioning, as well as the factors that affect its economic changes (diversification of the economy, development of high-tech industries, etc.). The paper by N. Alfrević *et al.* (2024) review anti-corruption research in Southeast Europe and compare it with global and regional literature. The authors emphasize the importance of an interdisciplinary approach to understanding corruption that encompasses social, economic, and political factors. They note that corruption in the region is often rooted in historical contexts and cultural traditions, which makes it difficult to implement effective anti-corruption measures. The study by D. Némec *et al.* (2021) focuses on the relationship between corruption, taxation, and the shadow economy. They point out that high levels of corruption lead to lower tax revenues and foster the development of the informal economy, which in turn undermines economic stability. The authors emphasize the need to reform the tax system

and increase the transparency of financial flows to combat these negative phenomena.

In the study by R. Pomfret (2022) analyses the interaction between the European Union and Central Asia, in particular in the context of economic development and trade. The author emphasizes that international cooperation can play an important role in supporting anti-corruption initiatives in the region, as transparency and accountability in financial matters are critical to attracting foreign investment. The study indicates that corruption in Central Asia is a complex socio-economic phenomenon that requires a comprehensive approach to overcome. The author emphasizes that in order to successfully fight corruption, it is necessary to focus on improving institutions, increasing transparency in governance, and involving the international community in the implementation of anti-corruption strategies.

A similar study on the new goals of economic and social development of the country is carried out by A. Figus and D.N. Shaikin (2019). The scientists described the impact of Kazakhstan's new economic strategy on the future development of the country. Works aimed at studying corruption in the country and methods of combating it also played an important role. Thus, S. Akhmetzhanov and S. Orazgaliev (2021) studied corruption in Kazakhstan in terms of trade unions, pointing to the reduced capacity to protect workers, i.e., to fulfil their immediate obligations. Z. Khamitov *et al.* (2022) examine the problem of unfair public procurement in the country, and the complicity of officials and suppliers in corrupt practices in this area of activity. Y. Kalyuzhnova and M. Belitski (2019), in turn, assessed the impact of corruption on the activities of local content companies, looking at the specifics in terms of regions of Kazakhstan. It is worth noting, however, that in the current scientific literature, there are quite a few works aimed at studying this phenomenon in the Republic of Kazakhstan, which once again indicates the relevance of the research.

The objective of the research is to analyse the anti-corruption experiences of Singapore, Finland, Denmark, South Korea, and Kazakhstan, and to develop recommendations for the Republic of Kazakhstan based on this analysis. The objectives of the study were as follows: to evaluate the effectiveness of the anti-corruption strategies implemented in the selected countries, focusing on their impact on governance and economic development; to identify the key factors contributing to successful anti-corruption measures and assess their applicability to the context of Kazakhstan.

Materials and methods

Some components of the Kazakh legal framework were used, namely the Law of the Republic of Kazakhstan "On Combating Corruption" (2015). The study also analysed the Law of the Republic of Kazakhstan No. 106-VIII "On Public Procurement" (2024), adopted in July 2024. The law aimed to increase transparency in public procurement and prevent corruption by providing clear tender procedures and control over the use of public funds. Its provisions are aimed at minimizing corrupt practices through open tender processes and accountability of officials. Data provided by some international organisations, such as Transparency International (2023), was used. Information from selected websites that provide statistical data on economic development, such as Macrotrends (Singapore GDP 1960-2023, 2023), was also useful.

The study used only official legislative acts of four countries to analyse anti-corruption practices: Singapore, Finland, Denmark and South Korea. The main legal acts that were analysed include the Prevention of Corruption Act (1960), which is the main legislative act in this country regulating the fight against corruption. It was adopted in June 1960 and establishes criminal sanctions for corruption offenses. In Finland, the Criminal Code of Finland (1889) was used for the study, which contains provisions on bribery and abuse of power. The Code was adopted in 1889, but was substantially updated in 2011 to take into account modern challenges in the fight against corruption.

The analysis of the Danish legislation was based on the Criminal Code of Denmark (2009), which established the legal framework for punishing corruption offenses in the country. The Code was updated in June 2009 and its provisions were adapted to international standards in the field of corruption prevention. For South Korea, the Act of South Korea “On the Prevention of Corruption and the Establishment and Management of the Anti-Corruption and Civil Rights Commission” (2019) was used. This act was adopted in December 2019 and establishes a system of anti-corruption management and mechanisms for public oversight of government activities. These legislative acts provided the basis for a comparative analysis of anti-corruption practices and determining the effectiveness of legal mechanisms used to fight corruption in these countries.

There is not enough data in the public domain about how corrupt countries are, or whether they are combating corruption. The only available index that can give an overall picture of the state of a country’s fight against corruption is the CPI (Corruption Perceptions Index). CPI is based on assessments and surveys of experts and business leaders on the level of corruption in the public sector in different countries. The CPI methodology uses data from several independent sources, such as business surveys and expert opinion analysis, to create a composite index that reflects the perception of corruption in a country. Other data that could help measure corruption occurrences is the number of corruption-related complaints or the number of criminal cases where public officials have exaggerated their public duties. Various official resources were used to analyse statistics on corruption-related criminal offenses. Data for Kazakhstan were taken from the General Prosecutor’s Office of the Republic of Kazakhstan (n.d.). For information on other countries, such as Finland, the official resource of the Ministry of Justice of Finland (n.d.) was used. Global-level analytical data was obtained from the website of Transparency International, (2023), and for Singapore, from the Corrupt Practices Investigation Bureau (n.d.). Each of these sources provided

up-to-date information on the status of corruption offenses and anti-corruption measures in the respective countries. Such information is often not publicly available, highlighting the need for international organisations or countries to provide more data on the fight against corruption. The countries analysed together with Kazakhstan in terms of their approach to combating the phenomenon were Finland, Denmark, Singapore and South Korea. The first two are from Europe, which has a very developed anti-corruption system. Singapore and South Korea are both fast-developing countries that also have specific, sometimes peculiar, methods of fighting corruption. This was the reason for choosing them for the study.

Comparative law was used to analyse the differences in legislation and enforcement between Kazakhstan, Singapore, Finland, Denmark and South Korea. In particular, this method helped to assess the effectiveness of measures such as transparency in public procurement in Kazakhstan compared to stricter regulations in Singapore, where there is strict liability for corruption offenses. This allowed us to understand why certain countries demonstrate lower levels of corruption due to specific legal norms. The legal modelling method was used to create proposals for improving Kazakhstan’s anti-corruption legislation. Based on the analysis of successful practices of other countries, possible ways of adapting anti-corruption laws to the Kazakh legal system were modelled, in particular in terms of ensuring greater control over financial flows in the public sector.

Results

To assess the effectiveness of a country’s anti-corruption measures, the CPI, which is based on many indicators, including surveys of businesses, as to the level of corruption in the country, will be used. The data for the five selected countries can be seen in table 1. Kazakhstan lags far behind most of the countries that have been compared, including Singapore, Finland and Denmark, which are consistently at the top of global anti-corruption rankings. For example, in 2022, Kazakhstan had a score of 36 on the Corruption Perceptions Index (CPI), while Singapore and Denmark scored 83 and 90 respectively (Transparency International, 2022). This suggests that Kazakhstan still has work to do to improve its position in the fight against corruption. Kazakhstan shows positive trends in the growth of the index, but it is not always ahead of its neighbours in terms of growth rates. For example, over the past few years, Kazakhstan has managed to increase its CPI from 30 to 36, while neighbouring countries such as Uzbekistan have also shown growth, but from a lower base. This shows that although Kazakhstan has positive dynamics, it is not the undisputed leader in terms of growth in the region (OECD, 2022).

Table 1. CPI data for selected countries from 2012 to 2023

Countries	Kazakhstan	Singapore	Denmark	Finland	South Korea	Uzbekistan	Kyrgyzstan	Ukraine
2012	28	87	90	90	56	30	27	26
2013	26	86	91	89	55	29	25	25
2014	29	84	92	89	55	33	29	27
2015	28	85	91	90	56	32	30	27
2016	29	84	90	89	53	30	31	29
2017	31	84	88	85	54	34	30	30
2018	31	85	88	85	57	36	31	32
2019	34	85	87	86	59	36	32	30

Table 1, Continued

Countries	Kazakhstan	Singapore	Denmark	Finland	South Korea	Uzbekistan	Kyrgyzstan	Ukraine
2020	38	85	88	85	61	39	33	31
2021	37	85	88	88	62	42	35	32
2022	36	83	90	87	63	40	36	33
2023	37	84	91	88	64	43	38	34
Changes per category	8	-4	0	-3	7	13	11	8
Changes, %	28.6	-4.6	0	-3.3	4.5	43.3	40.7	30.8
Average growth rate, %	2.9	-0.4	0.5	-0.3	3.2	5.4	4.2	3.1

Source: Transparency International (2023)

Kazakhstan's progress in the fight against corruption can be explained by a number of factors, including active reforms of anti-corruption legislation, the creation of new institutions to control corrupt practices, and the growing attention of international organizations to this problem. For example, the introduction of new technologies in the public procurement process and programs to raise public awareness of corrupt practices have become important steps towards improving the situation (World Bank, 2023). Kazakhstan's significant 4-point jump between 2019 and 2020 can be attributed to several key factors. Firstly, the introduction of new anti-corruption laws that increased liability for corruption crimes. Secondly, the intensification of the work of anti-corruption bodies, which led to an increase in the level of investigations. Thirdly, the growth of public awareness and involvement of the population in the fight against corruption through various educational programs. Finally, active international cooperation and support from organizations such as Transparency International have also played an important role in this progress (United Nations Development Program, 2022). Finland's 4-point decline in 2017 can be attributed to several factors. First, there were scandals involving political figures that reduced public confidence in institutions. Secondly, the growing international attention to corruption in the security and foreign policy spheres revealed some structural vulnerabilities in the system. There has also been criticism of insufficient control over party and campaign financing, which may have emphasised the need for improved anti-corruption measures (OECD, 2017; Yle News, 2018).

It is worth separately considering the specifics of combating the misuse of power by civil servants in these countries. Singapore has a very successful history of fighting corruption that started in 1960 with the rule of Lee Kuan Yew (Moldogaziev & Liu, 2021). The principles that were adopted then are still relevant today. Thus, the modern anti-corruption system in Singapore consists of the following variables: high salaries for civil servants (which makes them less likely to be bribed), a system of severe punishment for corrupt acts (imprisonment, fines, confiscation of property and even the death penalty), independence of the corruption agency, transparency in public procurement, increased control over political party finances, and education and public awareness of the problems that corruption can cause.

Singapore's modern anti-corruption system is based on comprehensive legislation that contains key provisions to ensure an effective fight against corruption. One of the most important acts is the Prevention of Corruption Act (1960),

which establishes severe penalties for corruption offenses, including imprisonment, fines and even confiscation of property. This law also defines the corrupt acts that are subject to criminal prosecution and provides the legal basis for anti-corruption bodies such as the Corrupt Practices Investigation Bureau (n.d.). The Prevention of Corruption Act (1988) ensures the independence of the bureau, which is critical for its effective work. The Bureau is authorised to conduct investigations and collect evidence in corruption cases, as well as to cooperate with other law enforcement agencies. This ensures transparency in the investigation of corruption cases and increases public confidence in the legal system.

Singapore has also taken steps to increase transparency in public procurement through the Government Procurement Act (1997), which requires an open and competitive process for contracting. This law helps to prevent abusive and corrupt practices in the procurement process by ensuring that information is clear and accessible to the public. Thus, ensuring transparency in the finances of political parties and election campaigns has also become an important part of the anti-corruption strategy, which helps to strengthen public confidence in state institutions.

Singapore has been emphasizing the importance of education and raising public awareness about corruption. Training programs and information campaigns conducted by government agencies are aimed at creating an understanding of the negative consequences of corruption and ways to prevent it. This approach contributes to strengthening moral norms in society and encourages active participation of citizens in the fight against corruption (Transparency International, 2023). These elements indicate that Singapore's anti-corruption system is one of the most effective in the world, thanks to a comprehensive approach that combines strict legislation, independent anti-corruption agencies, transparency in finance, and active public education.

The most characteristic feature of this system is the brutality with which Lee Kuan Yew opposed the phenomenon, even when the events of misconduct by government officials were directly related to his family members or friends. The model built in Singapore is therefore often referred to as the "zero-tolerance system". As figure 1 shows, Singapore's GDP has increased 567 times in the last 60 years, which is substantial. At the same time, Kazakhstan, a fast-growing transition country, has not managed to show a similar result despite all prospects: between 1990 and 2021, Singapore's GDP increased 11-fold, while Kazakhstan's increased 7.3-fold. This indirectly demonstrates the

effectiveness of the country's anti-corruption policies. The Pearson correlation coefficient between the CPI and GDP for Singapore from 2012 to 2020 is approximately -0.43. This indicates a moderate negative correlation, suggesting that as Singapore's CPI (reflecting perceptions of lower corruption) remained relatively stable, its GDP continued to

increase, but not in direct proportion. Thus, while Singapore's economic growth is significant, it does not necessarily correlate strongly with changes in its CPI during this period. This finding suggests that other factors may also contribute to Singapore's economic performance beyond anti-corruption measures alone.

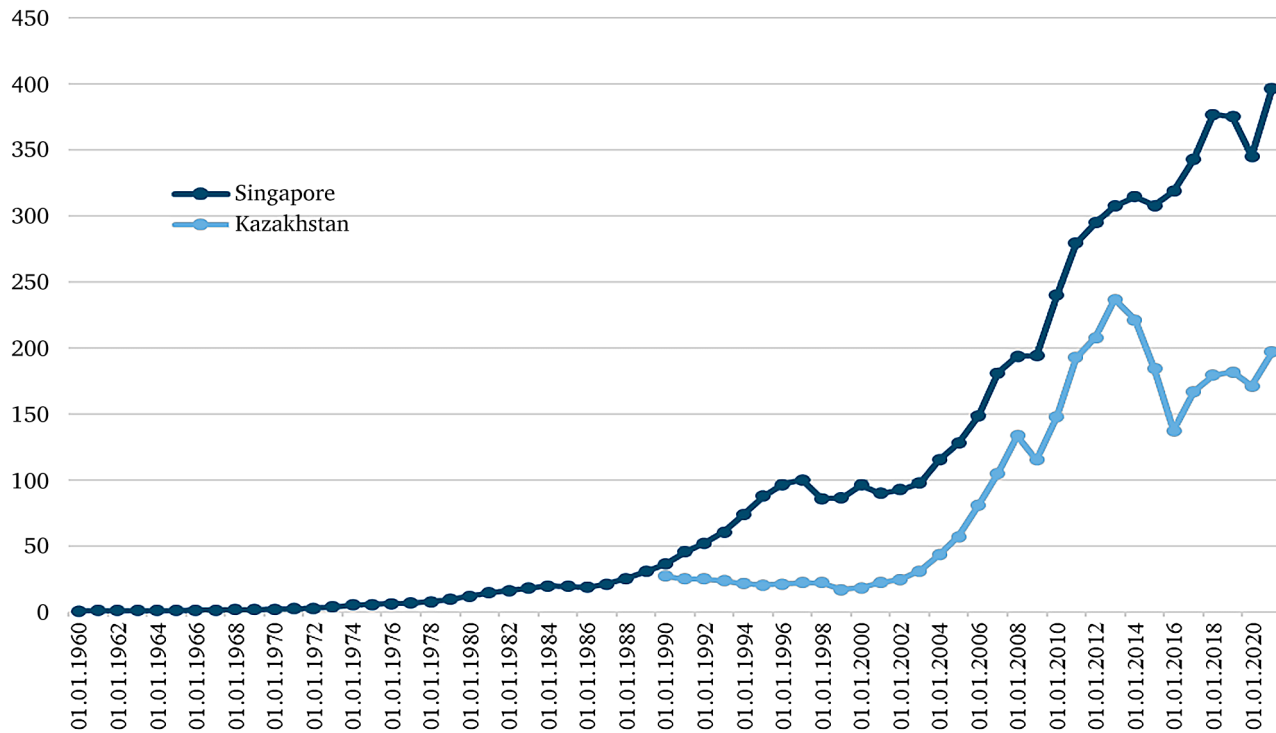


Figure 1. GDP figures for Singapore and Kazakhstan from 1960 to 2020, billion dollars

Source: Singapore GDP 1960-2023 (2023)

In 2022, about 2,500 cases of corruption-related offenses were registered in Kazakhstan, which is significantly higher than in other countries studied. For example, Finland recorded only about 50 cases, and Denmark had about 40 such offenses (Report: Finland ranks second, 2023). These figures confirm that these countries have effective anti-corruption measures and transparent public administration systems (Transparency International, 2023). In Singapore, which is known for its tough anti-corruption policy, the number of cases was even lower – less than 30, according to the Corrupt Practices Investigation Bureau (n.d.). In South Korea, where there is an active fight against corruption, about 300 cases were recorded. These statistics indicate that in countries with well-developed anti-corruption mechanisms, such as Singapore and Finland, the level of corruption remains minimal due to a strict legal framework and oversight. At the same time, in Kazakhstan, the high level of reported offenses reflects the need to further improve the anti-corruption system and strengthen control measures (General Prosecutor's Office..., n.d.).

Denmark also demonstrates a high level of effectiveness in combating corruption (Pomfret, 2022). There is also a high level of accountability for misconduct on the part of civil servants, although it is lower than in Singapore. The country also has a “zero-tolerance approach to corruption” which can be seen in some social processes. When applying for a job, a citizen must sign a special anti-corruption

contract to refuse to give or take bribes. If the contract is violated, the employee is dismissed, and a separate note appears on the employee's character sheet indicating corrupt practices. In addition, the country uses the latest technology to ensure transparency in public procurement and to reduce bureaucracy as much as possible (Transparency International, 2023). A key feature of the local approach is an emphasis on cultural and ethical factors. In other words, the country comprehensively implements policies related to the development of morality and honour of officials, the formation of a quality legal culture and a negative attitude towards corruption. The difference with the Singapore approach where ethical standards were not paid so much attention is immediately noticeable. The country's anti-corruption focus is also on the private sector, with both civil servants and corporations being monitored to make any attempts at corruption even less likely (Kyrychok *et al.*, 2024). All of the country's policies are designed to attract more investment, use public funds efficiently and improve the country's overall image on the world stage, all of which have a positive impact on economic development (Government Procurement Act, 1997).

Finland is also one of the countries that have been quite effective in combating corruption (Groop, 2021). The reason for this was a scandal in the 1990s among members of the government, which led to the criminal prosecution of several high-ranking officials and party leaders (Gillian, 2024). Since then, the Finnish government has introduced several

anti-corruption measures, which have been effective enough to give the country a top ranking in the Corruption Perceptions Index (Transparency International, 2023). Regarding the measures taken by the country, it has a high level of transparency (i.e., laws that require public authorities and businesses to publish information about their activities and budget expenditure), a high level of independence of justice, and a strong code of ethics among its citizens and public officials. The authorities also regularly carry out activities to raise awareness of the harm caused by corruption and use the latest technology to detect malpractice among officials, e.g., the electronic trading system of public procurement. The main peculiarity in this area in Finland, however, is that there is no anti-corruption law in Finland, nor is there a government authority to control corruption (Report: Finland ranks second, 2023). Therefore, for example, bribery is regarded as part of a criminal offence and is regulated at all levels of legislation and control systems. The judiciary and law enforcement authorities oversee the implementation of anti-corruption measures; the Chancellor of Justice and the Parliamentary Ombudsman play an important role in this process (Criminal Code of Finland, 1889).

Finland has lost several points in the CPI in recent years due to a number of factors related to political finance management and general transparency in public institutions. One of the main reasons was a scandal related to the lack of transparency in political party funding, which led to increased criticism from both the media and international organizations. In particular, the issue of financing election campaigns and political parties was insufficiently regulated, which caused concern among the public and international experts. Another reason was the concern about abuses in public procurement and high-level decisions, which, although not widespread, had a negative impact on the perception of transparency and integrity in public institutions. International attention to such issues has complicated Finland's image as a low-corruption country, which has been reflected in the CPI (Report: Finland ranks second, 2023).

South Korea is different from the countries analysed above. It is not among the top ten countries in terms of fighting corruption, but it has shown good results in combating corruption A. Androniceanu *et al.* (2022). The history of combating this phenomenon began in the 1960s when the country was experiencing rapid economic development, but at the same time was experiencing high levels of corruption. Its impact was particularly strong in the 1970s and 1980s when the country was under a *de facto* authoritarian regime: corruption was then widespread in all spheres of life, including government, business, and education. Following the establishment of anti-corruption agencies and several laws, the situation has started to improve (Supreme Justice, 2023). In 2024, the authorities are also trying to ensure the openness of state processes, and independence of justice and to form a civic attitude among citizens regarding the harms of corruption. In particular, the Online Procedures Enhancement for Civil Applications (OPEN) system is in place, where citizens can submit complaints if they observe problems with a particular official (Tracking the work of..., 2024) The practice of minimising government regulation in certain processes is also interesting, if possible. In other words, policies are in place to limit the interaction of government officials with businesses or any other economic activity. A significant problem for the country in terms of combating corruption is

widespread "nepotism": historically, businessmen have recruited friends and relatives to key positions. This is why, in such major Korean companies as Korean Airlines, Hanjin, Lotte and others, almost all top positions are occupied by people close to the management. And while this is also common in European and American companies, in South Korea the trend is much more widespread (Gillian, 2024).

Lastly, it is worth considering the peculiarities of the functioning of the anti-corruption system in the Republic of Kazakhstan. The history of combating corruption began in the 1990s, after the collapse of the Union of Soviet Socialist Republics and the withdrawal of countries from the union and the beginning of the formation of an anti-corruption strategy. This process began in 1998 after the adoption of the Law of the Republic of Kazakhstan "On the Fight Against Corruption" (1998), which is no longer in force now of writing the research, and the current Law is the Law of the Republic of Kazakhstan "On Combating Corruption" (2015). There have also been reforms in the judicial system, separate bodies have been opened to deal with corruption and old laws have been hardened.

However, the existing legislation is still relatively lenient compared to other countries in terms of combating corruption. The legislation also has problems in the implementation of its functions and needs to be improved. The fight against corruption is a key condition for ensuring transparency and accountability in any country, and this issue is particularly relevant for transition economies such as Kazakhstan. In order to assess the effectiveness of anti-corruption measures, it is important to compare the legislative approaches and law enforcement practices in Kazakhstan with countries that have achieved significant success in this area, such as Denmark and Singapore. This comparison will help to understand what mechanisms and approaches can be successfully implemented in the Kazakh legal system.

Kazakhstan has a well-developed anti-corruption legislation covering various forms of corruption offenses, such as bribery, abuse of power and money laundering. However, the system is often criticized for incomplete implementation and lack of effectiveness. In Denmark and Singapore, the laws clearly define all major forms of corruption, and their enforcement is rigorous and transparent. Singapore, for example, has the Prevention of Corruption Act, which covers all corruption offenses and provides for severe penalties. The Anti-Corruption Agency is responsible for fighting corruption, but is often criticized for political influence. In Denmark, the fight against corruption is entrusted to specialized bodies that operate independently of political structures. In Singapore, the Corrupt Practices Investigation Bureau (CPIB) has full independence from the government and strong investigative powers, making it one of the most effective anti-corruption bodies in the world.

Kazakhstan provides for fines, prison terms, and bans on holding certain positions. However, practice often shows that these sanctions are applied selectively. In Denmark, penalties include imprisonment and large fines, and they apply to both individuals and legal entities. In Singapore, the sanctions are even more severe: both individuals and companies are prosecuted, with the possibility of confiscation of property and long prison terms. Kazakhstan has a system of public income declarations of officials and tender control, but the problem is the actual implementation of these mechanisms. In Denmark and Singapore, access to information

on public contracts is open, which contributes to increased transparency in public procurement and minimizes the risk of corruption (Karamyshev, 2019). Singapore has implemented the OPEN system to monitor public procurement, allowing citizens to track the processes.

Kazakhstan is a party to the UN Convention against Corruption, which reflects the country's commitment to the international fight against corruption, but the level of cooperation with international organizations remains limited. This limits the possibility of implementing international best practices and ensuring more effective control over transnational corruption. At the same time, Denmark and Singapore have not only signed a number of international agreements, but also actively cooperate with organizations such as Transparency International, which allows them to have a high level of trust and effectiveness in anti-corruption activities.

It is also important to note that the level of law enforcement practice in Kazakhstan remains problematic, as the number of investigations of corruption cases and their prosecution is relatively low. This indicates the weakness of local anti-corruption bodies, which often face political influence and limited resources. In contrast, in Denmark and Singapore, the majority of investigated corruption cases result in convictions, which is an indicator of high law enforcement effectiveness. The success of these countries in the fight against corruption lies in the independence of anti-corruption bodies, strict legislation and effective international cooperation, which creates the preconditions for prompt and fair punishment of perpetrators (Kostiuk & Iryna, 2024).

This study analysed the effectiveness of anti-corruption measures in several countries, including Kazakhstan, Denmark, Singapore, and additionally considered data on Finland, South Korea and other countries. The CPI data show that Kazakhstan lags far behind countries such as Singapore and Denmark, where the fight against corruption is extremely effective. However, the country is showing some progress thanks to reforms and international support. The significant jump in Kazakhstan's score between 2019 and 2020 is due to the introduction of new laws and the activation of anti-corruption bodies. Denmark and Singapore stand out not only for their strict legislation, but also for the high level of transparency and independence of their anti-corruption bodies, which ensures the high efficiency of their systems.

Discussion

Kazakhstan's anti-corruption legislation has undergone significant changes in recent years, but the issue of its compliance with international standards remains relevant. For a deeper understanding of the legal challenges and shortcomings in the fight against corruption, it is worth paying attention to works analysing both theoretical and practical aspects of this legislation. The role of e-governance in government processes is assessed by T. Alam *et al.* (2023). They point out that transparency and accountability play an important role in reducing corruption. Researchers have shown that the use of e-governance has significantly increased the effectiveness of providing information to citizens in countries where such technology has been used, thereby reducing the potential for corruption. This demonstrates that electronic technologies should be used by all countries to combat the abuse of power by public officials (Yudina *et al.*, 2024). It is worth noting that in the Republic of Kazakhstan, e-technologies are also widespread among government

bodies and agencies. One example of the use of electronic technologies is the E.gov portal, where citizens can obtain information about public services, submit applications, and receive various documents right from home. A similar mechanism has been implemented in the judicial system and is called "e-justice", which allows judges to work with electronic documents and communicate with participants in the process via the Internet (Supreme Justice, 2023). This significantly increases the quality of the country's judicial system. The role of digitisation of public services is also explored in their study by A. Androniceanu *et al.* (2022). They carry out their study within the framework of the European Union. The researchers conclude that digitisation of the administration is one of the most effective ways of reducing corruption in the public sector. This reaffirms the fact that digitisation of the links between the different lanes of the public sector is an important part of the modern functioning of national economies.

D. Nemeč *et al.* (2022) also assessed the impact that corruption can have during the transition to the fourth industrial revolution. Researchers noted that during this period, this phenomenon may become an obstacle to progress, especially in terms of a slowdown in capital formation in the formal economy. This, in turn, will lead to insufficient investment and investment in the technology industry, which may lead to underdevelopment. Therefore, the state must secure a non-corrupt public administration environment to reduce the size of the shadow economy (Ketners & Tsiatkovska, 2024). The relationship between the level of corruption and the efficiency of the local and central government has been studied by T.T. Moldogaziev and C. Liu (2021). They noted that there is a negative correlation between perceived levels of corruption in society and assessments of organisational performance (the study was based on 12 transition countries in Europe and Asia). This suggests that such activity on the part of public authorities about the unfair use of their powers leads to a decrease in the efficiency of their functioning.

How different types of public sector reforms affected the level of corruption in their research was assessed by G. Mugellini *et al.* (2021). Their study found that national policies focusing on control and deterrence of corruption (i.e., increasing the likelihood of detection and increasing the sanctions for those offenders) reduce corrupt behaviour while creating positive incentives for not using corrupt measures helps to reinforce such behaviour. Scholars have also noted that moral leverage can also play a role in reducing corruption, suggesting a role in educating society about the harms of this phenomenon. However, these activities have a longer-term effect, and the use of controls and deterrents is better for a quicker effect.

Thus, a state policy of fighting corruption is essential for the economic development of the country and the well-being of its citizens. Although the methods used to combat this phenomenon are quite similar in different countries, they still have some differences and emphases (on strict laws and repressive measures, as in Singapore, or development of culture and ethics among the society and civil servants, as in Denmark and Finland). The effectiveness of any approach depends to a large extent on the mentality of the local population and the historical development of the area. This explains the fact that some approaches may be completely useless in different regions. Therefore, the state authorities of the Republic of Kazakhstan should shape their

anti-corruption policy by evaluating not only the successes or failures of other countries but also taking local peculiarities into account. In modern conditions, it is worth paying special attention to the application of the newest technologies for state structures, digitalisation, and automation of internal processes. This not only makes it possible to fight corruption effectively and without regard to human factors but also leads to positive results rather quickly.

Conclusions

This article analyses the effectiveness of anti-corruption measures in several countries, such as Kazakhstan, Denmark, Finland, Singapore, and South Korea, to assess their achievements in fighting corruption. The main subject of the study was to determine the level of corruption in Kazakhstan in comparison with other countries through the Corruption Perceptions Index and other indicators. The author has achieved the goal of the study by providing a clear analysis of the reasons why Kazakhstan is lagging behind such countries as Singapore and Denmark in the fight against corruption. The results of the study showed that Kazakhstan, despite the positive dynamic changes in the CPI index, still has significant problems with the effectiveness of anti-corruption activities and their implementation in practice. While Singapore and Denmark demonstrate high levels of transparency and accountability, Kazakhstan is only beginning to reform its system and strengthen control over corruption crimes.

The study reveals that Kazakhstan made considerable strides in its anti-corruption efforts between 2019 and 2020, largely due to the adoption of more robust legal frameworks and the increased activity of anti-corruption agencies. This improvement, demonstrated by the significant rise in the Corruption Perceptions Index, can be attributed to new laws that heightened accountability for corruption-related offenses and enhanced the operational capacity of anti-corruption bodies. Despite these positive developments, the study also

identifies persistent issues that hinder Kazakhstan's continued progress. The success of Denmark and Singapore in combating corruption is rooted in their strict legal frameworks, covering various forms of corruption such as bribery and abuse of power. Both countries' anti-corruption agencies operate independently from political influence, ensuring impartial investigations and accountability. This independence is crucial to their effective enforcement of anti-corruption measures. To advance Kazakhstan's progress in the fight against corruption, future research should focus on several critical areas. It is necessary to conduct a deeper analysis of corruption prevention mechanisms, such as the transparency of public officials' income and assets declarations. Research should explore how to improve the consistency and thoroughness of these declarations, as well as how to enhance public access to such information.

Future studies should delve into the international dimension of anti-corruption efforts, particularly how Kazakhstan can enhance its cooperation with global organizations such as the United Nations and Transparency International. Strengthening international partnerships could improve the country's capacity to address transnational corruption and adopt best practices from leading countries in this field. Lastly, research on building public awareness and civic engagement in anti-corruption initiatives would provide valuable insights into how grassroots movements and educational campaigns can contribute to reducing corruption at all levels of society. These areas of inquiry will help to further refine Kazakhstan's anti-corruption strategies and ensure that future reforms are both comprehensive and sustainable.

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Conflict of interest

None.

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Анотація. Корупція залишається основною проблемою для належного врядування в країнах. Вона знижує потенціал економічного розвитку країни та добробут її громадян, тому влада постійно шукає нові шляхи боротьби з нею. Тому необхідно оцінити існуючі методи боротьби з корупцією та проаналізувати досвід інших країн у цій сфері. Метою дослідження було проаналізувати досвід Сінгапуру, Фінляндії, Данії, Південної Кореї та Казахстану в контексті боротьби з корупцією та формулювання на його основі рекомендацій для Республіки Казахстан. У дослідженні були використані методи порівняльного права та правового моделювання для аналізу відмінностей в антикорупційному законодавстві та правозастосуванні між Казахстаном та іншими країнами. Були описані відмінності, які існують у цих державах, а також причини досягнення певних результатів у боротьбі з корупцією, незважаючи на багато спільних підходів (посилення законодавства, діджиталізація державних процесів, розвиток етичних і культурних взаємодій у країні). Поза тим, було дано оцінку можливостям Казахстану застосувати методи, які активно використовуються в Сінгапурі, Фінляндії, Данії та Південній Кореї, для свого специфічного розвитку. Було зазначено, що державі варто впроваджувати широкі антикорупційні заходи в усіх можливих сферах країни, а політика, яку застосовує влада, повинна бути комплексною. Дослідження буде корисним для вдосконалення державної політики, спрямованої на протидію недобросовісній поведінці з боку державних службовців

Ключові слова: економічний розвиток; врядування; державна політика; ефективність підприємств; довіра інвесторів