



U4 ISSUE 2025:3

Andrii Biletskyi
Series editor
Sofie Arjon Schütte

Integrity Councils in Ukraine: Lessons learned

Corruption erodes sustainable and inclusive development. It is both a political and technical challenge. The U4 Anti-Corruption Resource Centre (U4) works to understand and counter corruption worldwide.

U4 is part of the Chr. Michelsen Institute (CMI), an independent development research institute in Norway.

www.u4.no

u4@cmi.no

Read online

www.u4.no/r/IS2503

Following the 2014 Revolution of Dignity, Ukraine created so-called Integrity Councils to vet candidates for key judicial and anti-corruption roles. Combining national and international expertise, these bodies aim to ensure transparency, integrity and public trust in state institutions. This paper examines their development, challenges and impact, offering key lessons for other countries pursuing similar reforms in fragile or transitional democratic contexts.

- Ukraine's IC model offers valuable lessons for other transitional democracies seeking to reform their justice and anti-corruption systems.

Main points

- So-called Integrity Councils (ICs) were created in Ukraine after 2014 to vet candidates for leadership roles in anti-corruption bodies and the judiciary.
- Civil society and international experts played a central role in shaping ICs, ensuring transparency and accountability in the selection process.
- Political interference remains a significant challenge, with attempts to manipulate appointments and delay reforms.
- Resource and operational constraints, including lack of funding and administrative support, limit IC efficiency and sustainability.
- International involvement has been crucial in safeguarding IC independence and must continue until national institutions can operate impartially on their own.
- The designation of the nominating authority can significantly influence the impartiality of IC members, making it essential to consider not only who is appointed, but also who appoints them.

Contents

Selection and vetting processes in Ukraine and the emergence of Integrity Councils	7
Special verification	7
Lustration and judicial vetting 1.0	8
Competitive selection mechanism	9
Integrity Councils	10
Judicial vetting 2.0 and the introduction of international experts in Integrity Councils	11
Challenges in the functioning of Integrity Councils	16
Institutional design challenges	16
Political challenges	18
Resource and sustainability challenges	21
Operational challenges	22
What lessons can be learned from Ukraine's experience of establishing Integrity Councils?	23
Integrity Councils as a tool for reforming biased institutions	23
Civil society as a driver of reform	23
International involvement: Who is nominating versus who is nominated?	24
Ensuring the operational capacities of Integrity Councils	25
Establishing legal safeguards	25
Design matters: Key structural elements that determine effectiveness of Integrity Councils	26
References	28

The creation of anti-corruption agencies (ACAs) and the establishment of an independent judiciary have become important features of anti-corruption approaches in the world.¹ These institutions are essential to ensuring accountability and justice within a functioning democracy. Strong and competent ACAs play a pivotal role in identifying, investigating and prosecuting corruption offences, holding perpetrators accountable regardless of their status or influence.² Meanwhile, independent courts serve as the ultimate arbiter, assessing the evidence presented, upholding due process, and delivering fair and unbiased judgments, whether in the form of convictions or acquittals.

However, in nations with unconsolidated democracies (eg hybrid regimes, fragile democracies, defective democracies),³ establishing and maintaining the independence of these institutions is facing several challenges.⁴ These challenges are often rooted in systemic issues such as entrenched political interference, weak institutional safeguards and limited public trust.⁵ Political elites may attempt to exert control over ACAs and the judiciary, leveraging these bodies as tools for settling political scores or shielding themselves and their allies from accountability.⁶ This undermines not only the institutions' credibility but also the broader anti-corruption efforts, perpetuating cycles of impunity and eroding public confidence in governance.

Among the solutions to ensure the independence of the ACAs is the transparent selection and appointment of candidates with high-integrity profiles. These processes must be designed to identify individuals with the requisite expertise, ethical standards and independence to lead anti-corruption and judicial institutions. Transparency in these mechanisms not only strengthens public confidence but also acts as a deterrent against political manipulation. There are several mechanisms to ensure the selection of the heads of the ACAs, some of which involve civil society representatives.⁷ Ukraine has adapted such mechanisms in its own way by establishing multistakeholder commissions on vetting and selecting anti-corruption high-level officials and judges which we call Integrity Councils (ICs).⁸ These councils serve as independent bodies tasked with vetting and assessing candidates for leadership roles in ACAs and the judiciary. In 2014, Ukraine introduced ICs to select and vet the heads of newly created ACAs. This approach was later extended to the

1. Stephenson and Schütte 2022; Schütte 2015.

2. Schütte 2023.

3. Schedler 1998.

4. World Bank n.d.

5. Blokker 2021.

6. Engler 2020; Gloppen 2013.

7. Schütte 2015.

8. Gunjic, Biletskyi and Hlomb forthcoming.

judiciary. In this context, ICs were tasked with two main functions: first, to assess the integrity of candidates for judicial appointment – a practice broadly consistent with international standards; and second, to evaluate the integrity of sitting judges – a more controversial measure.⁹

Ukraine's experience offers valuable insights into the potential and the challenges of using ICs to strengthen institutional integrity of the ACAs and judiciary. This U4 Issue analyses Ukraine's experience with ICs, focusing on their evolution, their challenges, and the practical lessons they provide for strengthening ACAs' governance and ensuring their institutional integrity in other countries.

This U4 Issue is based on desk research of Ukrainian legislation on anti-corruption institutions and judiciary, content analysis of national and international media publications and reports on the topic, and a review of relevant literature on national and international mechanisms for enhancing the integrity and independence of ACAs. Additionally, it incorporates insights from an unpublished academic article on the same topic, providing a deeper analytical perspective on the challenges and lessons learned from Ukraine's experience.¹⁰ For this U4 Issue, we have not conducted interviews with relevant stakeholders (IC members or participants in integrity checks; selecting, screening and vetting processes) and therefore certain aspects, such as candidate motivation or perceptions of fairness, which may also influence the effectiveness of ICs, remain unaddressed.

9. The latter raises concerns about its compatibility with international norms on judicial independence, particularly the principle of security of tenure (or irremovability), which protects judges from arbitrary dismissal or political interference. For this discussion, please see Murray and van Zyl Smit 2024.

10. Gunjic, Biletskyi, Hlomb forthcoming.

Selection and vetting processes in Ukraine and the emergence of Integrity Councils

Most of Ukraine's anti-corruption reforms began after the 2014 Revolution of Dignity, which prioritised addressing corruption, establishing justice and upholding the rule of law. Achieving these goals required broad reforms, particularly in the justice sector. Among such reforms, civil society proposed and political actors supported the idea of establishing ICs – bodies substantially composed of national or international experts that verify the integrity of (prospective) anti-corruption justice officials to ensure the integrity of appointments in ACAs and the judiciary. Since their first establishment in 2015, ICs have gone through their own historical path and have changed in accordance with the current reform context.

ICs are part of a broader ecosystem of vetting and competitive selection mechanisms designed to enhance transparency and accountability in Ukraine's public sector. This section provides an overview of these mechanisms, including their evolution and impact, to contextualise the role of ICs and highlight the foundational principles they built upon.

Ukraine has long-established mechanisms for vetting and competitive selection to ensure the integrity and professionalism of individuals appointed to positions in the justice sector. These mechanisms include procedures for vetting and competitive selection for management and administrative positions. Vetting processes, in particular, have been developed across distinct areas, including special verification, lustration, competitive selection, integrity checks and screening of judges, each serving a critical role in promoting accountability and transparency.

Special verification

The (special) verification (*спеціальна перевірка*) is a mechanism designed to ensure that candidates for public office meet the necessary legal, ethical and professional standards before their appointment. The process typically includes verification of personal data, educational credentials and professional qualifications, along with medical fitness for the role. Asset declarations are reviewed for conflicts of interest or illicit enrichment, while criminal record checks and national security assessments ensure eligibility and safety for sensitive positions.

Established after Ukraine's independence, the mechanism was shaped by the Anti-Corruption Concept for 1998–2005, which highlighted the need for special verification of 'anti-corruption justice officials or candidates for such positions'.¹¹ However, it wasn't until 2010 that special verification became legally mandated.¹² The process now includes thorough checks on criminal liability, financial integrity, corporate rights¹³ and health, creating a comprehensive framework for assessing candidates' suitability for public service.

In 2014, the Revolution of Dignity occurred in Ukraine – protests that were aimed primarily at countering corruption and supporting the country's European integration course. Following the Revolution, the newly appointed Ukrainian government adopted two laws – the law On Lustration and the law On Restoration of the Trust to the Judiciary in Ukraine. These two laws brought two separate procedures, which were both aimed at dismissal of officials and judges considered to be involved in supporting the corrupt and anti-democratic policies of the previous political regime: *lustration of officials and judges* and *screening of judges*. Both processes primarily targeted officials and judges associated with the Yanukovich government or those whose actions directly undermined Ukraine's sovereignty and democratic governance.¹⁴

Lustration and judicial vetting 1.0

Lustration sought to restore public trust by removing individuals who had compromised the integrity and independence of state institutions. The Ministry of Justice of Ukraine was responsible for implementing this procedure. The law on Government Cleansing applied to officials and judges who were either involved in the activities of the communist regime of the Soviet Union or the activities of the regime of former President Yanukovich. The law prohibited the appointment of such officials or judges for ten years from the date of adoption of the law (16 October 2014). Unfortunately, lustration did not bring the desired results, as a significant number of dismissed officials were reinstated through the courts. According to the latest update of the Unified State Register of Persons Subject to the Provisions of the Law on Lustration of 2 July 2024, the register contains records of 589 persons of whom only five are judges.¹⁵ Additionally, publicly available data shows that about 90% of those dismissed are reinstated due to flaws in the procedure and model of

11. Office of the President of Ukraine 1998.

12. The Ukraine law 'On Prevention of Corruption'.

13. Corporate rights are a set of rights belonging to the participants (founders) of business companies in connection with their participation in such companies. See Floreskul and Loseva 2024.

14. Nekoliak 2020.

15. Diia 2025.

this procedure such as violation of the procedure of fair trial, lack of rights and guarantees for persons subject to lustration, non-compliance with the principle of individuality of the lustration procedure, etc.¹⁶ The ten-year ban on holding office by officials and judges under this law expired in October 2024.¹⁷

Beyond the selection of leadership for ACAs, vetting/screening procedures were also introduced in the judiciary with the adoption of the 2014 law On the Restoration of the Trust to the Judiciary in Ukraine. The screening of judges, along with broader lustration efforts, did not go as planned and achieved limited success. The specially created Temporary Special Commission for the Screening of Judges was tasked with conducting judicial screenings within one year from the date of its formation based on submitted complaints. The goal of the effort was to dismiss judges whose prior decisions or affiliations raised concerns about their impartiality (so-called Maidan judges), thus contributing to the broader goal of judicial reform.¹⁸ The overall results of the screening of judges were not remarkable: Only 25 judges were dismissed out of 234 complaints concerning 305 judges by the end of 2019. While not insignificant, this figure represents a small share of the judiciary in a system that employed 8,433 judges in first instance and appellate courts in 2014 and 7,983 judges in 2015.¹⁹ As a result, public trust in the judiciary remained largely unaddressed.²⁰

The peculiarities of the above procedures could not fully satisfy the public demand for justice and integrity in public service. With this in mind, new procedures for competitive selection and integrity checking were introduced in most of the newly created state bodies (including ACAs).

Competitive selection mechanism

The competitive selection mechanism was introduced along with integrity checking mechanisms after the Revolution of Dignity. It was first introduced for the heads of the newly established ACAs: the National Anti-Corruption Bureau of Ukraine (NABU), the Specialized Anti-Corruption Prosecutor's Office (SAPO) and the National Agency on Corruption Prevention (NACP). Each legislative act regulating the activities of a particular ACA contained provisions on the competitive selection of candidates for the positions of heads of the respective ACAs.²¹ Specially created competition commissions, comprising national and international experts, oversee

16. Glavcom 2021; Kotelva 2023.

17. Censor.Net 2024.

18. Zabyelina 2017.

19. Sudova vlada 2014; Sudova vlada 2015.

20. Ostrovska 2019.

21. The law of Ukraine On Preventing Corruption, the law of Ukraine On the National Anti-Corruption Bureau of Ukraine, regulations on the SAPO of the Prosecutor General's Office.

the process. They establish principles, criteria and methodologies to evaluate candidates based on professional competencies, legal knowledge, practical skills, leadership skills and integrity. Integrity assessments ensure that candidates meet ethical standards and demonstrate accountability. The process includes application reviews, testing, interviews and integrity checks, culminating in a shortlist of qualified candidates. The commission then submits its recommendations to the relevant body, for instance, the Cabinet of Ministers, for final appointment.

The competitive selection mechanisms for the heads of newly established ACAs incorporated integrity checks as a key component to promote public trust from the outset by assessing the candidates' integrity and professionalism. This reform aimed to ensure that individuals entering public service adhered to high ethical standards and demonstrated personal integrity, replacing entrenched corrupt practices with transparency and accountability. Unlike the special verification process, which focuses on legal and procedural compliance, integrity checks evaluate the moral and ethical suitability of candidates – although in practice, these processes often overlap, particularly when legal obligations reflect broader standards of integrity. These checks address limitations in the previous system by identifying individuals whose behaviour, even if not legally questionable, might undermine public trust. Integrity assessments verify asset declarations, compliance with anti-corruption laws, and consistency between income and lifestyle while also screening for conflicts of interest or unethical conduct. Integrity checking is applied to candidates for critical public service roles, including positions in ACAs such as the NABU, SAPO and NACP.²²

Integrity Councils

The introduction of competitive selection procedures, along with integrity checks as an integral part of those vetting/screening procedures, and limited success of other mechanisms contributed to the emergence of ICs, which were first formed as so-called competition commissions. In October 2014, Ukraine established three new ACAs to prevent, investigate and prosecute corruption offences respectively: NACP, NABU and SAPO. For each authority, a competition commission was set up to select and conduct integrity checks of candidates for leadership positions and submit suitable applications to the appointing authorities on an ad hoc basis (2015 for NABU and SAPO; 2016 for NACP). The establishment of such a mechanism was proposed by the Reanimation Package of Reforms Coalition²³ in its Roadmap of Reforms. The Roadmap contained, among other things, anti-corruption reform,

22. Specific provisions are contained in the relevant laws that regulate the activities of each of these bodies.

23. The coalition of leading non-governmental organizations and experts from all over Ukraine who have pooled their efforts to facilitate and implement reforms (for more information see <https://rpr.org.ua/en/>).

which provided for the creation of relevant legislation and specialised ACAs which should conform to the international standards of independence and efficiency (Organisation for Economic Co-operation and Development [OECD] 2013; autonomy from other government agencies, transparent and competitive selection of the head and main personnel, impossibility to dismiss the head for political reasons, and sufficient resources [Reanimation Package of Reforms 2015]). Civil society played an essential role in advocating for these reforms in the anti-corruption sector, pressuring political leadership, drafting the necessary legislation and taking part as members of such competition commissions.

A parallel process started in the judiciary. Considering the limited impact of judicial vetting efforts and the pressing need to reform the justice system and its supporting legal institutions, the Judicial Reform Council, created in 2014, developed the 2015–2020 Strategy for Judicial Reform,²⁴ emphasising qualification assessments for judges.

Judicial vetting 2.0 and the introduction of international experts in Integrity Councils

As part of the reform, the judicial governance bodies were to be restructured: The High Council of Justice (HCJ) was established and the High Qualification Commission of Judges of Ukraine (HQCJ) was relaunched (although in practice, it retained many of its members appointed under the previous 2010 law of Ukraine On the Judiciary and the Status of Judges).²⁵ The HQCJ was empowered with, among other things, the authority to conduct the vetting (qualification evaluation) of judges to determine their ability to administer justice in a given court, based on legally established criteria: (1) competence (professional, personal and social), (2) professional ethics, and (3) integrity. New features compared to the old HQCJ were, first, the definition of the criteria for qualification assessment, and second, the establishment of the Public Integrity Council (PIC), which consisted of 20 representatives of non-government organisations (NGOs) selected by the congress of NGOs²⁶ and was tasked with assisting the HQCJ in determining whether a judge (or

24. Decree of the president of Ukraine On the Strategy for Reforming the Judiciary, Judicial Procedure and Related Legal Institutions for 2015–2020.

25. Transparency International Ukraine 2019b.

26. The congress of NGOs refers to a gathering of representatives from NGOs that are eligible to participate in the selection of members for the PIC. Convened by the head of the HQCJ, this congress includes NGOs that have been actively engaged in anti-corruption, human rights protection or institutional reforms for at least two years. During the congress, participating organizations nominate and appoint members to the PIC to ensure public oversight in the judicial integrity assessment process. The congress operates under predefined rules, and only NGOs that meet specific criteria can participate.

candidates for the position of judge) meets the criteria of professional ethics and integrity for the purposes of vetting.²⁷

PIC was established to balance the work of the HQCJ and to help ensure that the judicial system would not continue operating according to outdated patterns. Its creation aimed to promote greater objectivity in the evaluation process and to strengthen public confidence in judicial reform.²⁸ Despite such a role, the PIC's work was limited to providing advisory opinions which could be overridden by the HQCJ – requiring two thirds of the commission members' votes (but not less than nine votes). According to civil society experts, this affected the PIC's productivity and efficiency. Information about a judge (candidate) that the PIC managed to obtain was overcome by a simple majority of votes of the HQCJ as a judicial governance body, which led to the HQCJ rejecting negative PIC opinions in 2/3 of the cases, even if it was a case of gross human rights violations by judicial candidates, declaration of false information or income discrepancies.²⁹ During the competition, with the newly reestablished Supreme Court, the HQCJ selected 120 candidates, 30 of whom (25%) were vetoed by the PIC as not meeting the criteria of professional ethics and integrity.³⁰

Recognising the PIC's challenges and its withdrawal from qualification assessment of judges,³¹ in 2018 the reformers advocated for the establishment of the Public Council of International Experts (PCIE) to help HQCJ assess candidates' compliance with the criteria of integrity (morality, honesty, integrity)³² for the newly created High Anti-Corruption Court (HACC). Composed entirely of international experts, the PCIE had a decisive role in the integrity checking process: If at least three members of the PCIE raised concerns about a candidate for the HACC, a joint meeting with the HQCJ was convened. A candidate could proceed only if supported by a majority of the joint members, including at least half of the PCIE members – otherwise, the candidate was disqualified from the competition. Such a decision-making mechanism ensured impartial and transparent selection processes.³³ The HACC's creation was supported by domestic advocacy and international pressure, with the International Monetary Fund (IMF) and the European Union (EU) tying financial aid to its establishment,³⁴ reinforcing global support for its robust

27. U4 n.d.a.

28. Kovalko 2016.

29. Shyba 2018; Lough and Rusu 2021.

30. Center for Civic Liberties 2017.

31. Makarenko 2018.

32. According to the law of Ukraine On High Anti-Corruption Court, the PCIE evaluates the legality of the sources of property origin, compliance of the candidate's or their family members' living standards with the declared income, compliance of the candidate's lifestyle with their status, and availability of knowledge and practical skills to consider cases within the jurisdiction of the HACC.

33. Kuz and Stephenson 2020; Vaughn and Nikolaieva 2021.

34. Kaleniuk 2019.

mandate.³⁵ One of the main reasons for the HACC creation is that judges should be assessed for integrity by national or international experts, whose candidates are determined on the basis of proposals from international organisations and donors.³⁶ Building on the PCIE's success, international experts were incorporated into selection processes for other ACAs. In 2019, civil society advocated for reforming the NACP's management structure, leading to the inclusion of national or international experts nominated by the international organisations or donors as its selection commission. This reform aligned with the expectations of Western partners, who aimed to enhance the NACP's capacity, including by supporting its relaunch.³⁷ Legislative changes embedding international expertise in these processes have since been applied to NABU, SAPO, NACP, and other authorities – the Asset Recovery and Management Agency, Economic Security Bureau of Ukraine, HQCJ, HCJ and the Constitutional Court of Ukraine. The further involvement of international experts in ICs was largely driven by conditionality mechanisms established by Western partners.³⁸ Their participation was tied to specific political and financial incentives, such as macro-financial assistance or progress in European integration efforts.

35. Kuz and Stephenson 2020; U4 n.d.a.

36. Vaughn and Nikolaieva 2021.

37. Yevropeiska Pravda 2019.

38. European Commission 2023.

The evolution of Integrity Councils: 2015 to present

Model (year)	Mandate	Composition	Appointing authority	Decision-making mechanism
Ad hoc commissions for the ACAs ^[1] (2015)	<p>Selection of the leadership of ACAs</p> <p>Recommendation on appointment of the selected candidate(s)^[2]</p> <p>Integrity and expertise assessment</p>	No obligation to include NGOs or international experts except for the IC for NACP	<p>NABU: 3 members by the President of Ukraine, 3 by the Cabinet of Ministers of Ukraine and 3 by the Verkhovna Rada of Ukraine</p> <p>NACP: 4 members by the congress of NGOs, 1 by the President of Ukraine, 1 by the Verkhovna Rada of Ukraine, 1 by the Cabinet of Ministers of Ukraine and 1 by the National Agency of Ukraine for Civil Service</p> <p>SAPO: 7 members appointed by the Verkhovna Rada of Ukraine, 4 appointed by the Council of Prosecutors of Ukraine</p>	Simple majority
PIC (2016–2025)	Assessment of the integrity of sitting judges or candidates for the position of judges	20 members (Ukrainian representatives of human rights defenders, NGOs, legal scholars, lawyers and journalists)	Appointed by the congress of NGOs convened by the head of the HQCJ	PIC may provide a negative opinion over judicial candidates or sitting judges based on integrity and professional ethics criteria; however, this negative opinion can be overcome by a qualified majority vote of the HQCJ (11 of 16 members).
PCIE (2019–2025)	Assessment of the integrity of candidates for the position of judges of the HACC	6 international expert members	All members are appointed by the HQCJ based on the proposals of international organisations.	The PCIE can block a candidate for the HACC through a joint vote with the HQCJ. If at least 3 PCIE members challenge a candidate, a special session is held. The candidate proceeds only if a majority of both bodies, including at least half of PCIE members, vote in favour; otherwise, they are eliminated from the competition.

Model (year)	Mandate	Composition	Appointing authority	Decision-making mechanism
Ad hoc commissions at the ACAs (2019–2023)	<p>Selection of the leadership of ACAs</p> <p>Recommendation on appointment of the selected candidate(s)^[3]</p> <p>Integrity and expertise assessment</p>	6 members	<p>NABU and NACP: 3 members by the Cabinet of Ministers of Ukraine</p> <p>3 members by the Cabinet of Ministers of Ukraine based on proposals of international organisations</p> <p>Could be national or international experts</p> <p>SAPO: 3 members by the prosecutor general based on the proposal of Council of Prosecutors</p> <p>3 members by the prosecutor general based on the proposals of international organisations</p> <p>Could be national or international experts</p>	<p>NABU and SAPO competition commissions: The decision is made by 4 members, and 2 of them must be nominated by international organisations.</p> <p>NACP competition commission: The decision is made by 4 members, and 3 of them must be nominated by international organisations.</p>

^[1] NABU, NACP and SAPO

^[2] NABU – shortlist of 2–3 candidates to appoint 1; SAPO – shortlist of candidates to appoint 1; NACP – 1 candidate for 1 position of the member of NACP

^[3] NACP 2020–2023 – 1 candidate for the appointment; SAPO 2020 – 1 candidate for the appointment; NABU – shortlist of 3 candidates to appoint 1

Challenges in the functioning of Integrity Councils

By examining the evolution of ICs and analysing the context of their establishment and functioning, we can identify several challenges. These challenges can be divided into institutional design, political, resource-related and operational, each of which has had a certain impact on the activities of the councils.

Institutional design challenges

As illustrated in the table above, each model of ICs possesses distinct characteristics that distinguish it from others. Over time, these models have evolved, incorporating new features to address the limitations and lessons learned from previous experiences. To better understand these developments, we will analyse the main institutional components of ICs separately: mandate, composition, decision-making mechanism and appointing authority.

Mandate: The mandate of each IC model has been clearly defined in the respective legal framework, outlining its authority and responsibilities in the vetting and selection processes. Despite these well-defined regulations, disputes have frequently arisen, leading to legal challenges in court. These cases often involve appeals on procedural grounds,³⁹ on the progression of a certain candidate to further stages of selection,⁴⁰ or on negative integrity assessments concerning professional ethics and integrity compliance.⁴¹

Another problem with the mandate may arise from the legal status of the IC itself. In Ukraine, the decision of any state authority can be reviewed in court. Given this, one could argue that ICs qualify as state authorities, making their decisions subject to judicial review. However, ICs can hardly be considered as such, since their decisions are recommendatory in nature and the decision on evaluation and (non-)appointment is made by the body under which ICs are established (eg the Cabinet of Ministers of Ukraine or the prosecutor general).⁴² This particular issue was raised before the Supreme Court, specifically regarding the status of the PCIE. In its decision of 2019, the Supreme Court ruled that the HQCJ, as a state body of judicial governance, is vested with the authority to organise and conduct qualification

39. Transparency International Ukraine 2022.

40. Ukrainska Pravda 2015.

41. Burtnyk 2021.

42. Burtnyk 2021.

assessments to determine the ability of a judge (candidate for the position of judge) to administer justice. The PCIE only assists the HQCJ in fulfilling this task.⁴³

In addition to legal disputes and uncertainties surrounding the formal status of ICs, other challenges related to their mandate have emerged in practice, in particular the standard of proof and criteria of integrity. As noted in recent analyses of the Centre of Policy and Legal Reform, a major unresolved issue concerns the substantive definition of integrity criteria – particularly, what types of facts constitute evidence of a lack of integrity. Despite nearly a decade of integrity checks conducted by various bodies, consistent and unified standards have yet to emerge. While institutions such as the PIC, PCIE, the Ethics Council and the Selection Commission for the HQCJ (the latter two have not been considered by this material) have adopted their own methodologies to improve transparency and predictability, these efforts have not resolved the issue at the systemic level. It was only in December 2023 that the Ukrainian Parliament authorised the HCJ to approve unified indicators for assessing judicial integrity and ethics, following consultations with other judicial governance bodies – a first step towards creating standardised criteria applicable across the judiciary.⁴⁴

Composition: Initially, ICs relied primarily on national experts (both government and non-government), most of whom were appointed by state authorities. This structure allowed the government to exert indirect influence over the competitive selection of ACAs leaders. The involvement of experts nominated by international organisations introduced a new dynamic. In ICs where such experts (whether international or nationally based) were included, the selection processes tended to demonstrate greater impartiality and transparency compared to those composed solely of nationally appointed members.⁴⁵ Moreover, the legal framework for ICs, which has changed over time, allows international organisations to nominate both international and national experts, offering flexibility and access to a wider pool of qualified candidates.

The overall effectiveness of these mixed structures has varied depending on the specific design of the commission, particularly regarding decision-making powers. In some cases, international experts participated without having a decisive vote, which limited their ability to influence outcomes. In contrast, structures such as the PCIE granted international experts a more substantial role in decision-making, which contributed to more rigorous integrity checks.⁴⁶ Despite this progress, half of the commission members continued to be appointed by national authorities, leading to

43. PIC 2019; Supreme Court 2019.

44. Smaliuk 2024.

45. Transparency International Ukraine 2021a.

46. Zhernakov et al 2025.

cases where national representatives deliberately sabotaged or delayed selection processes to prevent the appointment of independent and reform-minded candidates.⁴⁷

Decision-making mechanism: To prevent the integrity assessment process from becoming a mere formality, some ICs were granted specific powers to strengthen their role in selection procedures. However, these powers have not always been sufficient to ensure meaningful impact on integrity, selecting, screening and vetting processes. A clear example is the PIC, whose negative conclusions on judges or judicial candidates can be overridden by the HQCJ. This limitation was originally linked to constitutional and sovereignty considerations, as the full delegation of decision-making to an external or non-judicial body was seen as incompatible with Ukraine's legal framework. Consequently, the PIC was given a consultative rather than binding role, reflecting a balance between integrity oversight and institutional independence. This legal provision remains in force, allowing judges with integrity concerns to pass qualification assessments and retain their positions.⁴⁸ That said, with the relaunching of the HQCJ, the dynamics of overruling PIC opinions may be shifting, and the level of deference to PIC assessments could vary depending on the evolving institutional culture and practice. Similar mechanisms also differ across countries, depending on their legal systems and constitutional arrangements.

Appointment authority: the appointment of IC members by state authorities is inherently politicised, as it introduces the risk of governmental influence over institutions meant to ensure impartiality and transparency. Even when formal procedures for selection appear neutral, state-appointed representatives may be subject to political pressure, conflicts of interest or loyalty to the authorities that appointed them. This dynamic undermines the purpose of ICs, which is to provide independent integrity assessments and prevent undue influence in judicial and anti-corruption appointments.

Political challenges

Ukraine's anti-corruption reforms often face political resistance undermining the country's progress. This resistance often manifested in delayed voting on legislation,⁴⁹ excessive amendments to weaken reforms⁵⁰ (and the suspension of the powers of the ACAs).⁵¹ ICs were no exception to such challenges.

47. Shandra 2021.

48. Sukhov 2024.

49. Ukrainska Pravda 2018.

50. Transparency International Ukraine 2021b.

51. NACP 2020.

From the beginning of the establishment of ICs, political elites sought to influence the selection and appointment of ACAs' leadership, aiming to maintain control for political gain or to avoid scrutiny. Early efforts included attempts to place politically aligned individuals within these councils to take control of their decision-making. One instance of such interference was the former prosecutor general's attempt to place his first deputy on the competition commission for the selection of the head of SAPO.⁵² However, this attempt was countered by a combination of internal and external factors. Externally, public pressure played an important role, as civil society organisations and investigative journalists exposed these efforts, drawing the attention of the public.⁵³ Additionally, international partners, particularly the EU, responded by publicly reinforcing the need for transparent selection and political support for the integrity of anti-corruption appointments.⁵⁴ Internally, the composition of the commission, specifically the presence of civil society actors, helped to expose the attempts of political interference in the competition. The combination of internal oversight within the commission and international pressure eventually led to the appointment of more neutral committee members.

Another political challenge relates to the mandate of ICs, particularly competition commissions, and their authority to recommend either a shortlist of candidates or a single finalist for appointment. The NABU competition commission has the authority to recommend three finalist candidates, from which the Cabinet of Ministers of Ukraine selects one as the NABU director. The three-candidate model, according to civil society experts, was deliberately introduced by political leadership to create space for behind-the-scenes bargaining and to increase the chances of appointing a loyal candidate.⁵⁵ In contrast, the NACP competition commission can recommend one finalist candidate for appointment. These rules have remained unchanged for both commissions since their establishment.

However, the experience of the SAPO competition commissions highlights a different approach. During the first SAPO selection process in 2015, the panel was allowed to recommend multiple candidates for the prosecutor general to choose from. However, this raised concerns about potential political bias, namely, that prosecutors general could appoint the weakest candidate from the best or choose the politically dependent candidate in case they get into the shortlist of finalists. The amendment of this rule was envisaged by the Extended Fund Facility, signed between the IMF and Ukraine in 2015. As a result, since 2016, the law On the Prosecutor's Office stipulates that the SAPO competition commission can

52. LB.ua 2015.

53. Yevropeiska Pravda 2015.

54. European Union in Ukraine 2015.

55. Shcherban 2023.

recommend only one finalist candidate for the prosecutor general's consideration.⁵⁶ The most recent competition for the head of SAPO lasted nearly two years (August 2020–July 2022) and was marked by significant delays. These delays stemmed from the questionable actions of commission members appointed under Parliament's quota – at one point, they refused to vote for the candidate who scored the most points during the competition. Later, the commission's head further obstructed the process by repeatedly stalling decision-making.⁵⁷

Judicial resistance has also posed significant challenges. Many long-serving judges avoided the integrity assessments simply by not appearing for them.⁵⁸ According to civic experts, in some cases, the HQCJ and HCJ may have undermined public participation in the qualification assessment process, thereby contributing to limited accountability.⁵⁹ As a result, judges with negative PIC evaluations retained their positions.⁶⁰ This challenge to PIC activity has not yet been addressed and will require the use of existing legal disciplinary mechanisms on judges avoiding the qualification assessment and strengthening voting mechanisms to prevent the HQCJ from easily overriding PIC decisions.

To ensure the impartiality of IC members, civil society organisations such as the Anti-Corruption Action Centre, Transparency International Ukraine, and international partners, the OECD⁶¹ and IMF,⁶² proposed including international experts in ICs to enhance transparency and impartiality.⁶³ While international experts now make up half of ICs, the other half consists of government-appointed members, which has led to deliberate obstruction. For instance, during the recent selection of the SAPO head, in addition to the failure to vote for the candidate with the highest score, there were other procedural delays. Even when quorum of the commission was present, the head refused to open the meeting, claiming quorum was not met. Further delays were caused by procedural obstacles 'invented' by the head, including an unnecessary request for candidates to undergo special verification, which was later deemed unwarranted by the Prosecutor General's Office.⁶⁴ These issues were addressed by the recent law on Strengthening the Independence of the Specialized Anti-Corruption Prosecutor's Office.

56. IMF 2015.

57. Shandra 2021.

58. DEJURE Foundation 2023.

59. DEJURE Foundation 2024a; Sukhov 2020.

60. DEJURE Foundation 2024b.

61. OECD 2018.

62. IMF n.d.

63. Sliusar 2017.

64. Shandra 2021; Transparency International Ukraine 2021c.

Judicial appeals have also been used as a political tool to obstruct ICs' work. Compromised courts, such as the Kyiv District Administrative Court⁶⁵ (which was abolished only recently),⁶⁶ frequently overturned decisions and reforms. In addition, the recent constitutional petition by 58 members of parliament challenging the legal provisions on the engagement of foreign experts⁶⁷ could be seen as an example of resistance to the involvement of international experts in ICs that jeopardises the impartiality and effectiveness of these mechanisms.

Resource and sustainability challenges

ICs also face resource challenges that impact their sustainability and effectiveness. A primary concern is funding. National experts often work on a voluntary basis, relying on salaries from other institutions, while international experts are typically compensated through donor funding.⁶⁸ This disparity can create tensions, discourage national participation and raise sustainability concerns if external funding ceases. The recent suspension of USAID projects also showed that the progress of ICs could be jeopardised when one of the largest donors stops work in the country – the government needed to urgently find other resources to fund several ICs in the judiciary.⁶⁹ The stop-working order also affected the ability of the United States to nominate experts to ICs.

Another challenge is the recruitment of qualified experts as there is a limited pool of professionals with the necessary technical knowledge, regional expertise and understanding of Ukraine's legal system, integrity assessment processes and anti-corruption framework. The involvement of international experts places a certain burden on international organisations and donors that support such activities. However, allowing national experts to be nominated under the quota of international organisations can help address the challenge of insufficient contextual understanding.⁷⁰ Given that Ukraine has been implementing integrity- and veto-based reforms for several years, a pool of both national and international experts with relevant experience and qualifications has already been formed. In this context, it would be appropriate to formalise a 'personnel reserve' and engage these experts as needed, depending on their availability.

65. Transparency International Ukraine 2019a.

66. Zhernakov and Barchuk 2022.

67. Ukrinform 2024.

68. Poliakovska 2021.

69. RBC Ukraine 2025.

70. Zhernakov et al 2025.

Operational challenges

Operational challenges also affect ICs' effectiveness, such as the capacity of their secretariats (hired by the donors⁷¹ and placed in donor offices), which provide critical administrative and analytical support.

Technological and logistical issues further strain resources. Secure digital infrastructure is essential for managing candidate dossiers and maintaining confidentiality, yet limited resources hinder these processes. Proper facilities and tools for remote and in-person meetings, particularly for international experts, are also necessary but often lacking. Logistical issues, such as accessing dossiers remotely (eg between HQCJ and PIC), further complicate operations.

Finally, assessing realistic deadlines for vetting and integrity checks is critical. Balancing efficiency with thoroughness is challenging, especially with large caseloads, such as assessing 1,800 sitting or future judges, which is ongoing,⁷² a figure that must be understood in the broader context of Ukraine's judicial system. The HQCJ is currently engaged in several overlapping areas of work, including competitions for local (first instance) and appellate court judges, competitions for the HACC and the qualification assessment process itself. Due to limited institutional capacity, qualification assessments are progressing slowly. For example, in March 2025, the HQCJ conducted only one interview as part of the qualification assessment, received PIC opinions on 12 judges and scheduled moral-psychological testing for 41 others. These are distinct steps within the broader assessment procedure and should not be interpreted as completed evaluations of 54 judges. At the same time, as of 2024, there were 2,150 judicial positions in local and appellate courts that remained vacant.⁷³ Proper planning and resources are needed to address logistical hurdles and ensure effective evaluations.

71. An example of an announcement of the vacancy of a communication expert to assist the selection process of the director of the Bureau of Economic Security in Ukraine: <https://euaci.eu/en/announcements/communication-expert-to-assist-the-selection-process-of-the-director-of-the-bureau-of-economic-security-of-ukraine/>

72. High Qualification Commission of Judges 2023.

73. Agency for Legislative Initiatives 2024.

What lessons can be learned from Ukraine's experience of establishing Integrity Councils?

Ukraine's experience in establishing ICs offers useful insights into the challenges and opportunities of implementing judicial and anti-corruption reforms in a transitional democracy. The process of establishing ICs has evolved since 2015, providing lessons that can help improve their future work in Ukraine and offering insights that may be useful for other countries seeking to strengthen their anti-corruption and judicial integrity mechanisms.

Integrity Councils as a tool for reforming biased institutions

First, ICs can serve as an important tool for selecting/vetting public servants, especially those who will work in the anti-corruption sphere. Countries that have biased law enforcement or judicial agencies should pay attention to this tool, as it can help select among current law enforcement officers and judges, honest people who are ready to change the system. The path to success of such ICs will be their independence. Beyond addressing existing biases in law enforcement or judiciary, ICs can also function as a preventive mechanism, ensuring that individuals appointed to key positions uphold integrity standards from the outset.

Civil society as a driver of reform

Civil society plays a crucial role in vetting processes through ICs. Beyond their participation in these councils, civil society organisations contribute by overseeing the vetting process, advocating for transparency, and shaping legislative frameworks to strengthen the independence and effectiveness of these institutions.

This leads to the next conclusion – civil society can provide strong advocacy for the establishment of ICs with the support of international partners – the so-called sandwich effect, when civil society is pushing on one side and international partners on the other, so the Ukrainian government in between must implement the

reforms.⁷⁴ The experience of cooperation between civil society and the Ukrainian government shows that the latter is not always ready to compromise on reforms from within.

International involvement: Who is nominating versus who is nominated?

While discussing international involvement in integrity checks, selecting processes, screening processes and vetting processes, the focus should be not only on international experts themselves but, more importantly, on the bodies responsible for their nomination or appointment (whether international organisations or domestic state authorities). The key issue is not who is appointed, but rather who is making the appointments (nominations) and how that influences the overall integrity and impartiality of the process. This can help ensure the independence of ICs. Ukraine's experience shows the intention of certain political circles to take control of specialised ACAs to protect themselves from criminal prosecution and use these bodies as a tool for political reprisals against opponents. The major consideration in maintaining impartiality is not just the nationality of the experts but the neutrality of the appointing authority. International experts selected by the Ukrainian government could be as biased as national experts and be used or manipulated with the same political motives due to the absence of specific rules for integrity checks, selecting, screening and vetting.⁷⁵ Appointment of members of ICs through international organisations helps maintain their impartiality and reinforces trust in the process. Many of these organisations maintain a diverse roster of both national and international experts, focusing not on nationality but on qualifications, ethical standards and professional independence.

As might be expected, the engagement of international organisations or experts alone is not a panacea for solving all the problems that may arise in the anti-corruption sector in a country. However, they can provide a good start and a solid foundation for further reforms. Additionally, their presence provides a necessary safeguard during periods of political interference and institutional vulnerability. International participation in ICs is necessary as long as political interference remains a risk and institutional processes lack full independence. The role of international experts helps safeguard impartiality and ensure transparent selection mechanisms. In Ukraine, their involvement should continue until the country

74. Voswinkel and Halushka 2023.

75. In 2017 there was an attempt to appoint 'a little-known foreign security consultant with a questionable reputation as the auditor of NABU'. Learn more on this case here: <https://ti-ukraine.org/en/news/activists-have-staged-a-parade-of-fake-auditor-candidates-for-nabu/> (Transparency International Ukraine 2017).

institutionalises clear, self-sustaining procedures that prevent undue political influence and guarantee the integrity of appointments without external oversight.

To facilitate expert engagement, a structured, pre-vetted pool of experts, particularly those who could be nominated by the international organisations, should be considered. This roster would not serve as a list of final appointees, but rather as a pool of qualified professionals who meet baseline criteria of integrity, expertise and contextual understanding, and who are available for nomination when relevant selection processes are launched. Such a mechanism could help reduce delays in forming selection commissions and ensure a degree of continuity in institutional memory, even as the list of nominating organisations changes across different procedures.

Importantly, the composition of nominating organisations varies by process and over time, depending on the specific legal formulations and donor agreements in place. Some international organisations may qualify to nominate experts under one framework but not under another, and even when eligible, may choose not to participate due to potential conflicts of interest or internal policies. While these factors limit the universality of a shared roster, developing such a tool, under the coordination of a consortium or trusted neutral actor, could still provide a more sustainable foundation for expert engagement, while preserving the independence and credibility of ICs. Naturally, this would require additional coordination and resources, but it would also create a more sustainable system for selecting qualified individuals while preserving the independence of ICs.

Ensuring the operational capacities of Integrity Councils

ICs (and their secretariats) should be provided with all resources necessary for their effective functioning, including appropriate premises and access to relevant databases. Reformers must consider how to ensure council members have access to databases on declarations, assets and state property registers (if available). Such access would not only facilitate direct review of information by ICs but also enable them to verify data received from external actors, ensuring the accuracy and reliability of the assessment process.

Establishing legal safeguards

In addition, it is crucial to anticipate and address potential avenues for interference in IC activities. During the legislative establishment of ICs, special attention should be given to defining their legal status. One crucial consideration is whether their decisions can be contested in court. Clarifying and limiting the grounds for procedural appeals can significantly reduce delays associated with legal challenges to

IC's decisions. By embedding these safeguards into the legislative framework, reformers can ensure ICs' uninterrupted operation and their ability to fulfil their mandate effectively.

Design matters: Key structural elements that determine effectiveness of Integrity Councils

Beyond the role of civil society and international organisations/experts, the composition, mandate and powers of both ICs and appointing authorities could determine their overall effectiveness/success. Examining these elements provides insights into how ICs function in practice and where improvements are needed. These three elements could function as interconnected building blocks – modifying one can either strengthen or weaken the overall system. Therefore, it is essential to find the right balance that aligns with the specific context and conditions to ensure ICs operate effectively.

In Ukraine, an effective model has included the involvement of international or independent national experts, nominated by international organisations and donors, with a casting vote or veto power over decisions made by members appointed by the national authorities' quota, along with clear procedural safeguards to ensure continuity and consistency. Based on this experience, several essential features emerge that may enhance the success of similar mechanisms in other reforming democracies:

1. **Composition and appointing authority:** The inclusion of national and international experts, both nominated by reputable international organisations or donors, can enhance ICs' independence and impartiality. The method of appointment plays a critical role in insulating the IC from domestic political pressures.
2. **A clearly defined mandate:** The legal framework should specify the full scope of ICs powers, procedures and processes for approving or rejecting candidates within selection/vetting. Legal clarity helps prevent disputes over jurisdiction and ensures predictability in the council's work.
3. **Decision-making mechanism:** Granting national or international experts, nominated by international organisations or donors, a decisive vote or veto power has proven effective in safeguarding the impartiality of integrity checks, selecting processes, screening processes and vetting processes. Such power ensures that candidates who fail to meet required criteria and standards cannot be appointed solely through national-level political influence.

Ultimately, the success of ICs depends not only on their initial establishment but also on sustained efforts to ensure their independence, inclusivity and operational

effectiveness, making them a cornerstone for long-term judicial and anti-corruption reforms in transitional democracies like Ukraine.

Recommendations for Ukrainian reformers:

- Institutionalize the independence of ICs by embedding robust legal safeguards, defining their legal status and limiting procedural grounds for contesting their decisions in court.
- Design ICs with effective composition, mandates and powers that promote impartiality and resilience to political interference.
- Use legal frameworks to grant veto or cast votes to experts nominated by international organizations, ensuring ICs are insulated from domestic political manipulation.
- Ensure adequate operational capacity for ICs by providing resources such as access to declaration and asset databases, secure facilities and dedicated secretarial support.
- In public discourse, position ICs as a mechanism for selecting the best candidates.

Recommendations for international reformers:

- Consider ICs a tool for reforming biased or politically compromised institutions and new ACAs in transitional or post-authoritarian settings.
- Adapt the IC model to local contexts, ensuring legal clarity regarding their powers, procedures and scope of decision-making.
- Prioritize the neutrality and independence of appointing bodies (not just the nationality of experts) when designing IC-like mechanisms.
- In case of involvement of both national and international experts appointed by international organisations, provide special decision-making power (eg veto rights) to safeguard impartiality in selection and vetting processes.
- Develop rosters or pools of qualified experts in advance to avoid delays and strengthen institutional continuity.
- Use ICs not only as corrective mechanisms but also as preventive tools to ensure individuals entering public office meet integrity standards from the outset.

References

Agency for Legislative Initiatives. 2024. [Judicial power. What is inhibiting the reform of local courts and courts of appeal?](#)

Blokker, P. 2021. [The democracy and rule of law crises in the European Union and its Member States.](#)

Burtnyk, Kh. 2021. [Як відмити недоброчесність?](#) (How to launder dishonesty?). DEJURE Foundation.

Censor.Net. 2024. [10-year lustration process has been completed in Ukraine: Yanukovych-era officials can be freely appointed to positions.](#)

Center for Civic Liberties. 2017. [Громадська рада доброчесності негативно оцінила завершальний етап конкурсу до Верховного Суду](#) (Public Integrity Council negatively assessed the final stage of the competition to the Supreme Court).

DEJURE Foundation. 2023. [Судді знову зривають кваліфіціювання. Тепер вони відмовляються проходити оцінку повним складом ВККС](#) (Judges are disrupting the qualification assessment again. Now they refuse to be evaluated by the full HQCJ).

DEJURE Foundation. 2024a. [Second Panel of the HQCJ to conduct qualification assessments for four judges without Public Integrity Council involvement.](#)

DEJURE Foundation. 2024b. [Ten months of the qualification assessment: 43 judges of low](#)

[integrity retained their positions, and 27 were recommended for dismissal.](#)

Diia. 2025. [Єдиний державний реєстр осіб, щодо яких застосовано положення Закону України «Про очищення влади», набір даних](#) (The Unified State Register of Persons Subject to the Provisions of the Law of Ukraine 'On Purification of Government', a dataset).

Engler, S. 2020. ['Fighting corruption' or 'fighting the corrupt elite'? Politicizing corruption within and beyond the populist divide.](#) Democratization, 27(4): 643–661.

European Commission. 2023. [Commission pays further €1.5 billion in assistance to Ukraine.](#)

European Union on Ukraine. 2015. [Head of the EU delegation to Ukraine Jan Tombinski on appointment of the selection committee for the anti-corruption prosecution office.](#) Facebook.

Floreskul S., and Loseva, V. 2024. [Corporate Law of Ukraine: Basics and Features.](#) Avitar.

Glavcom. 2021. [Повстання люстрованих. Як колишні прокурори помстилися державі](#) (Rebellion of the lustrated. How former prosecutors took revenge on the state).

Gloppen, S. 2013. [Chapter 5: Courts, corruption and judicial independence.](#) Corruption, Grabbing and Development: Real World Challenges. Cheltenham and Northampton (MA), Edward Elgar Publishing.

Gunjic, I., Biletskyi, A., and Hlomb, M. Forthcoming. Justice reform by spill-over: The

story behind the rise of integrity vetting by civil society actors and international experts in Ukraine.

High Qualification Commission of Judges. 2023. [The Commission resumes the qualification evaluation of judges.](#)

IMF (International Monetary Fund). n.d. [Attachment 1. Ukraine: Memorandum of Economic and Financial Policies.](#)

IMF (International Monetary Fund). 2015. [Ukraine: Letter of intent, memorandum of economic and financial policies, and technical memorandum of understanding.](#)

Kaleniuk, D. 2019. Daria Kaleniuk on the anti-corruption reframes in Ukraine. Interview by Matthew Stephenson. KickBack: Global Anticorruption Podcast, 6 August.

Kotelva, K. 2023. [Люстрація в Україні: ЄСПЛ побачив порушення прав людини](#) (Lustration in Ukraine: ECtHR sees human rights violations). Ukrainian Helsinki Human Rights Union.

Kovalko, N. 2016. [Громадська рада доброчесності як інструмент впливу суспільства на судову систему](#) (Public Integrity Council as an instrument of public influence on the judicial system). Yurydychna Gazeta.

Kuz, I. Y., and Stephenson, M. C. 2020. [Ukraine's high anti-corruption court. Innovation for impartial justice.](#) U4 Brief 2020:3.

LB.ua. 2015. [Від Шокіна вимагають звільнити Севрука з комісії з відбору антикорупційного прокурора](#) (Shokin is demanded to dismiss Sevruk from the commission for the selection of the anti-corruption prosecutor).

Lough, J., and Rusu, I. 2021. [Why is progress towards the rule of law so challenging? The cases of Ukraine and Moldova.](#) Bertelsmann Stiftung.

Makarenko, O. 2018. [Civil society growing tired: public watchdog withdraws from Ukraine's 'faked' judicial reform.](#) EUROMAIDAN Press.

Murray, C., and van Zyl Smit, J. 2024. [Global standards on judicial independence and removal: Grappling with vetting and fresh appointment.](#) Comparative Constitutional Studies, 2(2), 315–336.

NACP (National Agency on Corruption Prevention). 2020. [Due to the CCU's decision, the NACP has to suspend the inspections of prevention of corruption in five Ukrainian state institutions.](#)

Nekoliak, A. 2020. [Ukraine's presidents and the judiciary: An uneasy relationship.](#) Verfassungsblog.

OECD (Organisation for Economic Co-operation and Development). 2013. [Specialised anti-corruption institutions: Review of models: Second edition,](#) OECD Publishing.

OECD (Organisation for Economic Co-operation and Development). 2018. [Istanbul anti-corruption action plan fourth round monitoring: Progress update for Ukraine, Implementing the OECD Anti-Bribery Convention.](#) OECD Publishing.

Ostrovska, O. 2019. [Що з люстрацією та чим вона закінчилась](#) (What about lustration and how it ended). LB.ua.

Poliakovska, T. 2021. [Рада ухвалила закон, який запускає судову реформу: документ регулює формування Вищої кваліфікаційної комісії суддів](#) (Parliament

adopts law launching judicial reform: The document regulates the formation of the High Qualification Commission of Judges). UNIAN.

Public Integrity Council. 2019. Громадська рада не є суб'єктом владних повноважень – Верховний Суд (Public Council is not a subject of power - The Supreme Court).

RBC Ukraine. 2025. Уряд України веде переговори з ЄС щодо фінансування заморожених проєктів USAID (Ukrainian government negotiates with the EU on funding frozen USAID projects).

Reanimation Package of Reforms. 2015. Дорожня карта реформ для Верховної ради VIII скликання (Roadmap of reforms for the Verkhovna Rada of the VIII convocation).

Schedler, A. 1998. What is democratic consolidation? Journal of Democracy 9(2): 91–107.

Schütte, S. 2015. The fish's head: Appointment and removal procedures for anti-corruption agency leadership. U4 Issue.

Schütte, S. 2023. Specialised anti-corruption institutions: Measuring their performance and managing our expectations. U4 Blog Post.

Shandra, A. 2021. Anti-corruption prosecutor chief selection committee fails to approve clear winner; activists point fingers at president. Euromaidan Press.

Shcherban, O. 2023. New NABU director: Has Bankova really 'hacked' the competition and how the bureau will continue to work? ANTAC.

Shyba, I. 2018. Yak 20 liudei budut otsiniuvaty dobrochesnist ukrainskykh suddiv (How 20

people will assess the integrity of Ukrainian judges).

Sliusar, A. 2017. Антикорупційний суд в Україні: передумови утворення та гарантії ефективності (The anti-corruption court in Ukraine: Prerequisites for establishment and guarantees of effectiveness). Transparency International Ukraine.

Smaliuk, R. 2024. Доброчесність у системі правосуддя: на шляху до єдиних та чітких індикаторів. Center for Policy and Legal Reforms.

Stephenson, M. and Schütte, S. 2022. Specialised anti-corruption courts – A comparative mapping. 2022 update. U4 Anti-Corruption Resource Centre. U4 Issue 2022:14.

Sudova vlada. 2014. Огляд даних про стан здійснення правосуддя у 2014 році.

Sudova vlada. 2015. Огляд даних про стан здійснення правосуддя у 2015 році.

Sukhov, O. 2020. Vovk tapes reveal corruption as lifeblood of Ukrainian law enforcement.

Sukhov, O. 2024. Ukraine's judicial reform relaunch shows mixed results so far.

Supreme Court. 2019. Ухвала від 25 лютого 2019 року у справі №9901/83/19 (Judgment of February 25, 2019, in case No. 9901/83/19).

Transparency International Ukraine. 2017. Activists have staged a parade of fake auditor candidates for NABU.

Transparency International Ukraine. 2019a. Brief summary on issues with Kyiv Administrative Court.

Transparency International Ukraine. 2019b. [Chaos and prospects of judicial governance.](#)

Transparency International Ukraine. 2021a. [ARMA competition. What's going on?](#)

Transparency International Ukraine. 2021b. [The committee reviewed all 504 amendments to the Anti-Corruption Strategy.](#)

Transparency International Ukraine. 2021c. [New year and still no SAPO head.](#)

Transparency International Ukraine. 2022. [How can the appeal disrupt SAPO competition?](#)

U4 Anti-Corruption Resource Centre. n.d.a. [Case of judicial reform in Ukraine.](#)

Ukraine. President. 1998. [**Про Концепцію боротьби з корупцією на 1998–2005 роки**](#) (On the concept for combating corruption for 1998–2005). Presidential Decree No. 367/98, 24 April, 1998.

Ukrainska Pravda. 2015. [**Підлеглий Шокіна оскаржує конкурс на антикорупційного прокурора**](#) (Shokin's subordinate challenges competition for anti-corruption prosecutor).

Ukrainska Pravda. 2018. [**Рада провалила скасування «правок Лозового»**](#) (Rada fails to cancel Lozovyi's amendments).

Ukrinform. 2024. [**Народні депутати просять КСУ оцінити конституційність залучення міжнародних експертів до конкурсних комісій**](#) (MPs ask the CCU to assess the constitutionality of involving international experts in competition commissions).

Vaughn, D. and Nikolaieva, O. 2021. [Launching an effective anti-corruption court: Lessons from Ukraine.](#) U4 Anti-Corruption Resource Centre. U4 Practice Insight 2021:1.

Voswinkel, J., and Halushka, O. 2023. [Ukraine's reconstruction: 'Continue to apply the sandwich effect!'](#)

World Bank. n.d. [Anti-corruption agencies. Can anti-corruption agencies be successful in combating corruption?](#)

Yevropeiska Pravda. 2015.

[**Антикорупційного прокурора, що є умовою ПДВЛ, призначать на фіктивному конкурсі – експерт**](#) (Expert: Anti-corruption prosecutor to be appointed in fictitious competition, which is a condition of the VLAP).

Yevropeiska Pravda. 2019. [Posol YeS: potriben perezapusk NAZK](#) (EU Ambassador: NACP needs to be relaunched).

Zabyelina, Y. 2017. [Lustration beyond decommunization: Responding to the crimes of the powerful in post-Euromaidan Ukraine.](#) State Crime Journal 6(1): 55–78.

Zhernakov, M., and Barchuk, N. 2022. [Liquidation of DACK.](#) KyivPost.

Zhernakov, M., Hasymova, K., and Barchuk, N. 2025. [Judicial selection with the involvement of international experts.](#) DEJURE Foundation.

About the author

Andrii Biletskyi

Dr Andrii Biletskyi is an anti-corruption expert experienced in conducting anti-corruption research, providing anti-corruption trainings and developing anti-corruption legislation. He is the administrative director of the Anti-Corruption Research and Education Centre of the National University of Kyiv-Mohyla Academy and a lecturer at the university's Department of Political Science. He holds a PhD in Criminal Law, Criminology and Penitentiary Law from the Yaroslav Mudryi National Law University.

Acknowledgements

The author wishes to express sincere gratitude to Ivan Gunjic and Martha Hlomb, with whom the concept of Integrity Councils was originally developed. Their insights and collaboration were instrumental in shaping the ideas presented in this U4 Issue. The author is also grateful to the University of Zurich for providing the opportunity to explore international approaches to vetting and integrity checking, which significantly enriched the research underpinning this U4 Issue. Last but not least, U4 and the author also thank Jan van Zyl Smit and another reviewer for their detailed and constructive comments on a draft of this paper.

Keywords

vetting – integrity – appointments –
recruitment – Ukraine – Eastern Europe –
Europe

How to cite

Biletskyi, A. 2025. Integrity Councils in Ukraine: Lessons learned.
Bergen: U4 Anti-Corruption Resource Centre, Chr. Michelsen
Institute (U4 Issue 2025:3)

Publication

First published 20 June 2025

Disclaimer

All views in this text are the author(s)', and may differ from the U4
partner agencies' policies.

Cover photo

Shutterstock.com/Mariya_Bu – license: copyrighted
<https://www.shutterstock.com/image-photo/ukraine-donbass-0416-editorial-illustrative-set-2631237231>

Creative commons

This work is licenced under a Creative Commons Attribution-
NonCommercial-NoDerivatives 4.0 International licence (CC BY-
NC-ND 4.0)



U4 partner agencies

German Corporation for International
Cooperation – GIZ

German Federal Ministry for Economic
Cooperation and Development – BMZ

Global Affairs Canada

Ministry for Foreign Affairs of Finland

Ministry of Foreign Affairs of Denmark /
Danish International Development Assistance
– Danida

Norwegian Agency for Development
Cooperation – Norad

Swedish International Development
Cooperation Agency – Sida

Swiss Agency for Development and
Cooperation – SDC

UK Aid – Foreign, Commonwealth &
Development Office

Corruption erodes sustainable and inclusive development. It is both a political and technical challenge. The U4 Anti-Corruption Resource Centre (U4) works to understand and counter corruption worldwide.

U4 is part of the Chr. Michelsen Institute (CMI), an independent development research institute in Norway.

