



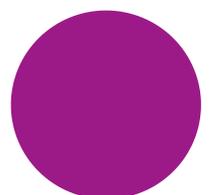
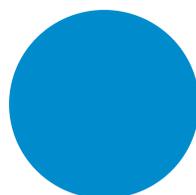
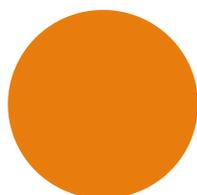
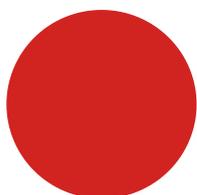
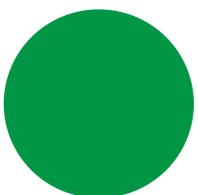
Lviv city  
council

# SECTOR OF INTEGRITY AND PREVENTION OF CORRUPTION

OF THE DEPARTMENT 'CITY MAYOR'S ADMINISTRATION'



REPORT



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# Part 1: General information

## Lviv's ambition on integrity

1

For governmental organizations throughout the world, to establish an effective integrity system is a necessity. Lviv has expressed the ambition to improve governmental integrity, mitigate corruption risks and lower the actual level of corruption. After a long-term cooperation with experts from Governance & Integrity International, in 2017 the city of Lviv, as the first city in Ukraine, has established a Sector of Integrity and Prevention of Corruption within the structure of the city administration (hereafter also "the Bureau").

Lowering the actual level of corruption within Ukrainian governmental institutions is a huge challenge. Ukraine will need time, money and expertise. International best practices must be imported and applied, but that alone is insufficient. Those best practices must also be tailored. With the help of specialists, the Ukrainian governmental organisations must build their own expertise, experiment with international tools and adapt them to the Ukrainian situation. The application of those tools must be done in the face of real and violent threats made in protection of vested interests, and a deep-seated scepticism shared by citizens and civil servants alike. In addition, it must also be acknowledged that Lviv is doing this pioneering work in the field of governmental integrity, while confronted with economic and institutional challenges. Improving governmental integrity always takes time, but in the Ukrainian context it also requires courage, determination and creativity.

With these complex realities in mind, we humbly but firmly hope that our Bureau will succeed in building the completely new integrity system in Lviv. We also believe that our model can be followed in future by other Ukrainian cities and that together we can change the situation in Ukraine for better.



# 2

## About the Bureau

**Creation:** The Sector of Integrity and Prevention of Corruption was created within the department 'City Mayor's Administration' of Lviv City Council by the decision of the Executive Committee of Lviv City Council №884 that came into force in October 2017

**Goal:** The Bureau is called to establish the integrity system in Lviv City Council, including all its structural units, municipal enterprises, institutions and organisations in order to ensure integral and corruption-free governance within Lviv City Council

Moral learning process	Compliance practice
Moral deliberation	Preventive cycle
Moresprudence	Repressive apparatus

**Directions of Bureau's work:**

- The moral learning process
- The preventive cycle
- The repressive apparatus

**Members:** Currently the Bureau comprises 6 members, whose work is centred on preventive cycle. It is planned to develop the 2 other directions and increase the number of Bureau's employees to 12.

- Lesya Hydyma-Miseyuk
- Uliana Fedorovych
- Vyacheslav Lombrozo
- Svitlana Hurniak
- Nazarii Kuplovskiy
- Natalia Subbotina



**Current members**

Integrity system comprises two subsystems: the moral learning process and a compliance practice. The moral learning process ensures that difficult decisions are taken only after a careful weighing of all considerations. A compliance practice prevents violations of the Code of Conduct and external legislation, and applies disciplinary action/punishment should a violation take place. Each subsystem has two interdependent and mutually reinforcing components.

# 3

## Capacity building

Creation of the Bureau is an ongoing process. Governance and Integrity International (G&I International) supports and facilitates the whole process of the Bureau's capacity building and also involves other international experts.

At the very beginning, it was necessary to ensure the viability of the Bureau through a careful selection and training of its members. In the first year of its existence, these became possible thanks to the financial support from The Ministry of Foreign Affairs of the Netherlands and expert support provided by G&I International.

This support allowed the Bureau to move forward in developing preventive cycle. For instance, the work on the first deep corruption risk analysis was in itself a learning process for the members of the Bureau. While performing this analysis with the support from G&I international, the members of the Bureau learned the methodology of such an analysis, technics for conducting interviews and ways to describe the findings in a well-structured manner.

**The building process of the Bureau comprises 3 main phases:**

### Preventive cycle

(e.g. identification and reduction of corruption risks, Code of Conduct, Anticorruption strategy)

**2018-2020**

### Repressive apparatus

(e.g. reporting system, internal investigations, imposition of disciplinary action or punishment)

**2020-2022**

### Moral learning process

(e.g. trainings in moral decision-making and a creation of a system of moral deliberation)

**2022-2024**

As of December 2020, the Bureau is actively engaged in tasks belonging to the preventive cycle and gradually starts to introduce elements of the repressive apparatus.

Members of the Bureau aim for international excellence and to this end regularly participate in professional events related to the directions of the Bureau's work. The most recent experience (October 2020) includes training on ISO standards concerning the internal audit and sustainable development in communities: ISO 19011:2018 and ISO 37101:2016.

We have the ambition to develop an efficient model so that other cities both in Ukraine and internationally can learn from our experience and build similar structures.

# Part 2: An overview of the Bureau's work

1

## Corruption Risks Analyses

One of the key tasks within preventive cycle is assessment of vulnerabilities of processes, identification of corruption risks and provision of recommendations with a view to eliminate or minimize those risks.

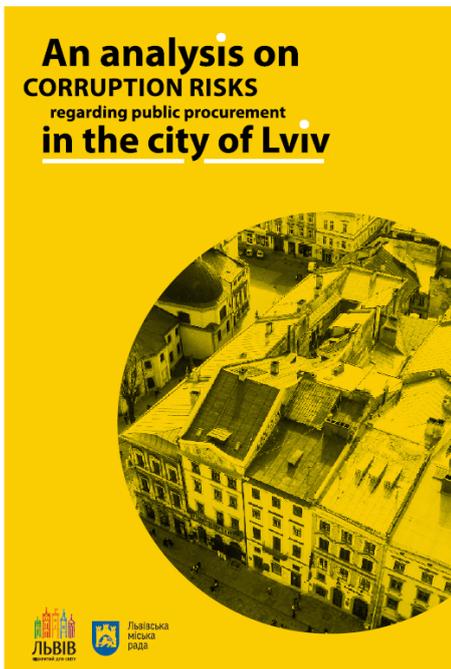
Public procurement

Other corruption risks analyses





# Public Procurement



Corruption Risk Analysis on the public procurement process of the municipality of Lviv, namely Lviv City Council, its executive bodies, municipal enterprises, institutions and organisations is the first extended risk analysis by employees of the Bureau, completed in 2019 with help of international specialists from G&I International who have been working on governmental integrity in Ukraine for almost ten years and who have worked on similar risk analyses throughout the world using the same methodology. The methodology consists amongst others of desk research, process and law analysis and in-depth interviews.

After a number of introductory meetings, more than 63 in-depth interviews were conducted with members of tender committees and with other employees of structural units of Lviv City Council and its municipal enterprises, engaged in public procurement, in budgeting and other related processes as well as with employees that the procurements are made for and who are the end users of the purchased, goods, works, or services. Also, 8 interviews were conducted with business representatives. Finally, a detailed study was conducted on 18 tender committees, their decision making mechanisms, and the usage of ProZorro.

The analysis allowed to identify 8 corruption risks, numerous modi operandi (patterns in which risk might be occurring) for each of them and 5 risk enhancing organisational weaknesses.

This analysis resulted in 9 recommendations, vital to clear the sphere of public procurement in Lviv from corruption. These recommendations have been communicated to the city major and relevant managers, responsible for LCC policy on public procurement.



## Other corruption risks analyses

In addition to the extensive risk analysis on public procurement, the Bureau performed a number of smaller-scale corruption risks analyses, including:

- **Analysis of corruption risks associated with the decision-making during the transfer of land**

This analysis addressed consistency of the legal department's approach to approving documents related to the parcel of land in a situation when there were ongoing court proceedings. The Bureau's findings projected a scenario of how the alleged inconsistency violates rights of the parties to the dispute and how it can cause material damage in case the higher judicial body rules in favour of the applicant. The Bureau discussed its findings with legal department while the parties to the dispute eventually reached an amicable settlement.

- **Analysis of corruption risks of economic activities and public procurement of the municipal enterprise "Zbyranka"**

This analysis was initiated after a former director of the municipal enterprise "Zbyranka" was charged with bribery. The analysis helped to identify corruption and integrity risks associated with public procurement, storage and use of special reagents on a leachate treatment station of the municipal enterprise "Zbyranka". The Bureau has formulated recommendations on elimination of risks. Later "Zbyranka" was liquidated through the takeover by municipal enterprise "Green City".

- **Analysis of corruption risks during the accounting of the fuel use at the wastewater treatment facilities of the municipal enterprise "Lvivvodocanal"**

This analysis allowed to identify corruption risks and possible violations in a sphere of use of the property of the municipal enterprise, unjustified closure of an internal investigation related to the theft, as well as lack of control over fuel use. It resulted in changes to a security system at the enterprise and system of control over fuel use as well as to a resumption of the internal investigation carried out within the municipal enterprise.



- Analysis of corruption risks of the procedure for monitoring of financial documents by the Unit of financial control of the department ‘City Mayor’s Administration’**

The aim of this analysis was to change the process of receiving, processing and returning the financial documents exercised by the Unit of financial control. The need in such this analysis arose after the former head of this structural unit was charged with bribery. The proposed changes should minimise risks of corruption and conflict of interest, including such violations as receiving illegal remuneration for a faster review of documents, approving the documents in spite of the violations found or without a proper review and other similar violations. The changes recommended by the Bureau were implemented.
- Analysis of corruption risks of the procedure for joint financing of renovations and reconstructions of apartment houses**

This analysis concerned corruption risks during the formation of a list of the apartment houses selected for joint financing. As a number of applicants willing to take part in this procedure exceed the available budget, there is a risk of biased formation of a final list. After analysing the process from the moment of receiving applications to the formation and publication of a final list, the Bureau recommended digitalising this process to reduce subjectivity. The model of an appropriate digital system has been developed in cooperation with Lviv IT School (LITS), however, implementation of his system was postponed due to a huge scope of work needed to digitalise housing stock in Lviv.
- Analysis of corruption risks associated with the draft of the city council’s decree “On approving the regulation on the privatization of communal property by the means of purchase”**

This analysis of a legislative draft resulted in the identification of corruption risks associated with the proposed changes to the existing procedure of purchase of the communal property subject to an inalienable betterment. Authors of the draft suggested transferring powers to approve such a purchase from the relevant structural unit to the commission of deputies. The analysis showed that such a change would have increased corruption risks. Recommendations of the Bureau were taken into account and the draft in question was not adopted by the city council.
- Analysis of corruption risks related to the public procurement of renovation of the building that belongs to the cultural heritage of local importance**

This analysis dealt with a specific segment within public procurement, namely the process of renovation of buildings related to the cultural heritage of local importance. The Bureau also assessed the wider context associated with this sphere and identified risk-enhancing organisational weaknesses. Implementation of recommendation based on this analysis is in progress.

# 2

## The Code of Conduct

The Code of Conduct is a main document of both preventive cycle and repressive apparatus as it defines the integrity violations with which both are concerned.

The Code of Conduct provides moral guidance for the conduct of the Lviv City Council employees. It outlines the desired conduct, based on values, and types of behaviour that contradicts integrity and thus is unacceptable. The production of the Code, its dissemination whereby employees are made aware of its contents, and the discussion of the Code all have a preventive effect in themselves.

The Code of Conduct includes 4 types of unacceptable behaviour:

- **misuse of power** (e.g. corruption or conflict of interest)
- **misuse of resources** (e.g. fraud or theft)
- **interpersonal violations** (e.g. discrimination or sexual harassment)
- **professional violations** (e.g. culpable negligence)

The Code of Conduct of the civil servants and other employees of Lviv City Council, its executive authorities, municipal enterprises, institutions and organizations was adopted by the LCC Executive committee decision № 879 from 20.09.2019.

Its creation was a result of thorough and almost year-long discussions of the Working group led by the Bureau and comprising scholars, civil servants and activists.

The Code of Conduct forms a part of the internal workplace regulations. Following its adoption, every employee of Lviv city council confirmed by signature the fact they are aware of the document.

The Bureau has also started to implement the Code of Conduct by facilitating workshops for LCC employees in cooperation with the HR Department. The main tasks of such workshops include deepening understanding of the Code's provisions among employees, understanding the necessity of the Code and empowering employees to use it for the protection of their rights. It is vital that the employees not only formally sign the document, but also know how to use it to set their day-to-day work free from integrity violations and are aware of the Reporting System. All of the LCC employees are expected to take part in workshops during 2020-2022.

# Code of Conduct workshops



**January -  
September 2020**

excluding March - June due to  
severe COVID-19 restrictions

**>45**  
workshops  
organised



**>500**

**LCC employees took part**

**≈ 1700**

**Overall number of LCC employees**

\*not including employees of municipal enterprises

**Structural units fully covered  
so far:**



**District Administrations**



**HR Department**



**1 h 30 min**

**average duration  
of a workshop**

**The workshops partly  
covered 65% of LCC units**



**Photos from various workshops on the Code of Conduct**

# 3

## The Reporting system

The Reporting System is a tool that allows to make sure the provisions of the Code of Conduct are not only declared, but are actually observed. It serves as a linking point between preventive cycle and repressive apparatus.

The Reporting System allows both employees and citizens to report the violations of the Code of Conduct by LCC employees through various channels:

- General reporting channels, including:
  - Personal reception of citizens by civil servants of LCC, its executive authorities, municipal enterprises, institutions, and organizations
  - Regular mail
  - Centre for administrative services
- Special reporting channels, including:
  - Special e-mail: [ethics@lvivcity.gov.ua](mailto:ethics@lvivcity.gov.ua)
  - Special online form on the LCC official website [www.city-adm.lviv.ua](http://www.city-adm.lviv.ua)
  - “The box of trust” – a physical suggestion box installed in the LCC building
  - Personal appeal to the Bureau of Integrity

Importantly, the Reporting System allows to report a violation on a confidential basis, as well as to submit anonymous reports.

The Reporting System was officially established by the LCC Executive Committee decision № 92 from 07.02.2020.

### February - December 2020



# 4

## Monitoring of public procurement

As public procurement was the theme of the Bureau's first deep corruption risk analysis, it was a logical next step to continue closely follow the situation in this sphere.

Monitoring of public procurements of executive bodies, municipal enterprises, institutions and organisations of Lviv city council is performed based on the reports received from citizens and employees through the Reporting System and information from open sources, including risk indicators that are automatically generated by "DoZorro", the nation-wide online system that contains tools for monitoring of public procurements.

The monitoring completed so far concerned diverse spheres, including:

- Procurement of home textiles for the use in educational facilities
- Procurement of special software for the automated system of car parking
- Procurement of medical supplies during the time of COVID-19 pandemic
- Procurement of renovation work in the building belonging the local cultural heritage

Monitoring has resulted in the follow-up recommendations on prevention of violations in public procurement.

The following online systems are commonly used for monitoring:



prozorro  
PUBLIC PROCUREMENT



YOU  
CONTROL



Clarity Project

# 5

## Participation in internal investigations

The process of capacity-building of the Bureau's function regarding repressive apparatus requires time and it has not been fully launched yet. However, members of the Bureau have already participated in several internal investigations as part of the ad hoc commissions on internal investigation created within Lviv city council.

In particular, during 2018-2020 the Bureau took part in:

- Internal investigation on comprehensive and objective examination of all the circumstances of violation of the legislation in the sphere of service in the local self-government and anticorruption legislation by the director of municipal enterprise "Zbyranka"
- Internal investigation regarding violation of the Code of Conduct exercised in a response to a message from a citizen forwarded to Lviv city council from Office of Security service of Ukraine in Lviv region
- Internal investigation of the incompliance with the legislation in the sphere of service in the local self-government and anticorruption legislation by the head of Unit of financial control of the department 'City Mayor's Administration'
- Twelve commissions on internal investigations related to the incompliance with the time limits set for the submission of the declarations of employees of local self-government.



# 6

## Participation in other commissions and working groups

Except for the commissions on internal investigations, the Bureau has participated in a number of working groups related to its functions, including:

- Commission on the review of the citizen's appeal created by the city mayor decree № 518 from 01.10.2019
- Working group on recommendations on the changes to the procedure of Unit of financial control of the department 'City Mayor's Administration'
- Working group on analysis of public procurement of the Zaliznychna district administration during 2018-2019
- Working group on implementation of the Reporting System
- Working group on coordination of implementation of anticorruption measures
- Commission on review of procurement of home textiles organised and exercised by the educational bureau of Sykhiv and Lychakiv districts of the educational unit of Humanitarian Policy Department.



# Lviv Anti-corruption Strategy and Anti-corruption measures

Anti-corruption strategy is called to serve as a roadmap for anti-corruption initiatives at the city level. It is essential to ensure a coherent approach to anti-corruption policy in order to ensure its efficiency.

While this instrument should make coordination of future measures easier, the drafting of the document itself is quite a challenge. It needs to cover various spheres of city operations and requires expertise on peculiar issues and solutions. Hence, the Bureau has chosen to make this process as open to experts as possible, serving as a facilitator of the working group on Anti-corruption strategy.

The working group produced a draft with a number of ideas, which are to be restructured and aligned by the Bureau. This process is complex and ongoing. It is expected that the full text of the strategy will be reviewed and adopted by the Lviv city council at the beginning of 2021.

Meanwhile, the Executive committee has approved in 2019 a list of Anti-corruption measures for the period of 2019-2020 (Decision №880 from 20.09.2019). This list forms a part of the comprehensive set of measures suggested by the working group on Anti-corruption strategy.

The following measures out of this list has been implemented so far:

1. Publication of the date and time, agenda and protocols of the meetings of consultative and advisory bodies established by the Executive committee:

- Council for architecture and urban planning of the Architecture Directorate of the LCC Urban Planning Department
  - Commission for installation of open-air summer terraces nearby objects of the restaurant sector for the entrepreneurial purposes in the city of Lviv
    - Commission for naming and renaming of streets, side streets, avenues, squares, square parks and buildings in the city of Lviv
      - City commission on the road traffic safety

2. Implementation of the standards of the Construction Sector Transparency Initiative (CoST)

3. Adoption of the legal instrument for the settlement of the conflict of interest of the Executive committee members

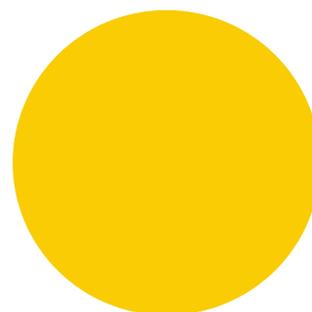
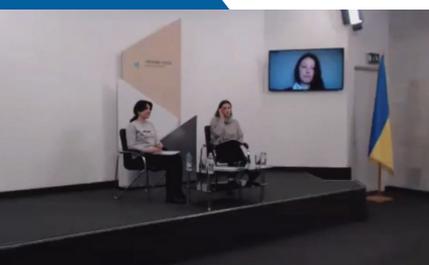
4. Provision of open access to the official online platform for the assistance of people wishing to start or continue their entrepreneurial activities

5. Introduction, popularization and use of the instruments of citizen participation in the matters that require participation under Ukrainian legislation

6. Preparations for the functioning of the internal control and audit unit within the structure of LCC in accordance with COSO internal control standards:

- Analysis of the process of repairs and renovations commissioned by the LCC Directorate for the protection of cultural heritage
  - Evaluation of the relevance of introduction of COSO system in the LCC Directorate for the protection of cultural heritage using repairs and renovations as a pilot sector
    - Identification of risks in the processes related to the analysis
      - Formulation of recommendations aimed at elimination or mitigation of risks in accordance with the COSO guiding principles.

In addition, in December 2020 Sector took part in a presentation of a report "100 Corruption Schemes in Ukrainian regions" created by NGOs "Anti-corruption headquarters" and "Together against corruption" in cooperation with other experts and Coalition of anti-corruption NGOs. This report provides some useful insights that will be used during the work on the Anti-corruption strategy.



# 8

## **Increasing the level of transparency of the LCC**

It is expected that the increase in transparency of the LCC processes should increase accountability and lower the level of engagement in corrupt practices.

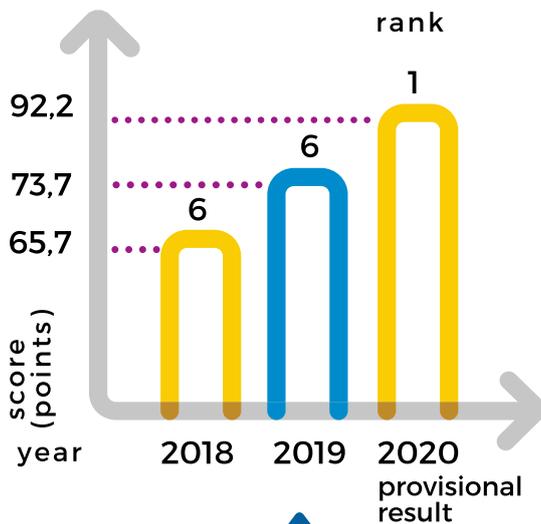
The Transparency Ukraine initiative “Transparent Cities” serves as a useful tool for motivating city council’s work on maximizing the level of transparency. This is an annual ranking of the 100 biggest cities, which takes into consideration various indicators such as openness of information, public engagement in decision-making process, budgeting, procurement, etc.

In response to the decision of a city major, since 2019 the Bureau has been working in close cooperation with the municipal institution “City Institute” on improving Lviv’s position in this ranking. The progress achieved as a result of this work allowed Lviv to take the leading position in the provisional ranking 2020. In addition, in cooperation with the “City IT centre”, the Bureau initiated a renewal of the system for transfer and publication of public information held by various LCC executive bodies.

Importantly, residents of Lviv gained access to the open data in various spheres of Lviv City Council’s operations. The examples of the positive changes associated with the “Transparent cities” initiative include:

- Creation of the system for online registration of the applications for the apartment register, which allows to track the progress of the application and publish the data from the register
- Creation of the opportunity to apply online to receive social services in the city institutions for social assistance
- Disclosure of the list of all community-owned facilities that can be leased or made available for use in other ways
- Disclosure of information on the out-of-school education services
- Creation and introduction of the electronic procedure to obtain a passport for temporary structures of entrepreneurial purposes
- Publication of the announcements on upcoming meetings of the public commission on housing issues, including its agenda, date and time and protocols of its meeting.

## Dynamics of transparency in Lviv according to the "Transparent Cities" initiative

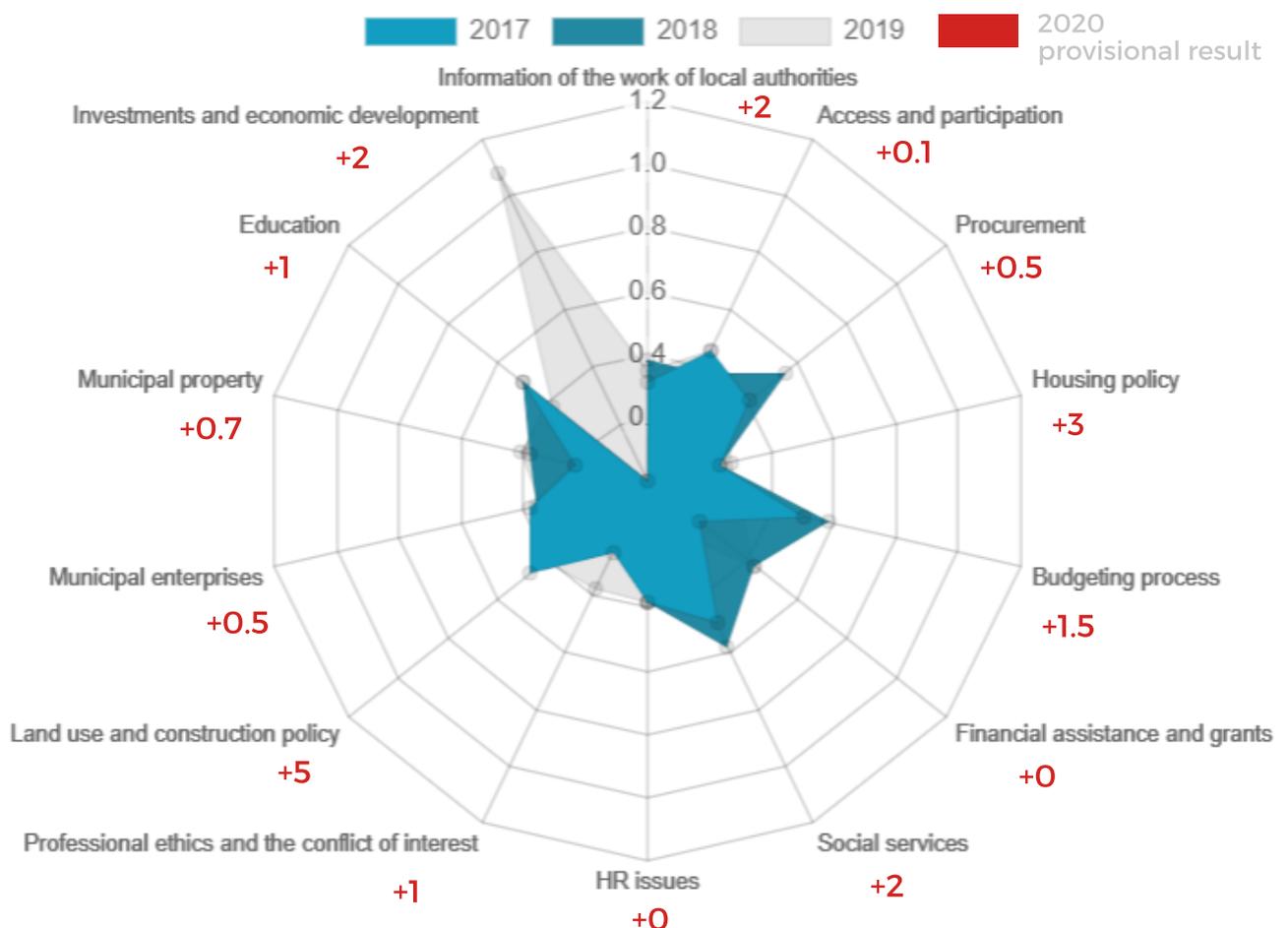


Transparent city	80-100 points
Mostly transparent city	60-79 points
Partly transparent city	40-59 points
Mostly not transparent city	20-39 points
Not transparent city	0-19 points

Total score and rank of Lviv 2018-2020

The scale of transparency according to 2019 methodology

## Dynamics of transparency in Lviv in specific areas (2017-2019, and interim result 2020)



Source: <https://transparentcities.in.ua/en/lviv?dynamic=true>

In 2020 Lviv was invited by NGO “Transparency International Ukraine” to discuss the methodology for the assessment of transparency and accountability of Ukrainian cities. Within this discussion, the Bureau (together with the “City Institute”) presented “Analysis of the transparency methodology”, which was taken into account during the creation of the Online Platform for Transparency and Accountability of Local Government.

Beyond the “Transparent cities” initiative, the Bureau was working during 2018-2019 on increasing transparency in the sphere of school budgeting:

- Creation of the Protocol on integrity in the governance of additional funding in Lviv schools
- In cooperation with the Directorate for education of the LCC Department of humanitarian policy, the Bureau has contributed to the introduction of the “Open school budgets” software in Lviv schools
- Participation in organization of a detailed analysis of sources of financing and expenses of Lviv schools with the use of open data in cooperation with communal enterprise “City IT centre” and the Directorate for education of the LCC Department of humanitarian policy.

data of  
**117**  
schools was  
analysed  
in 2019

**7**  
schools  
implemented  
the software



# 9

## Organisation of training and workshops

Except for the abovementioned workshops on the Code of Conduct, the Bureau has also organised:

- Training on public procurement legislation for members of tender committees in cooperation with NGO “Center for public monitoring and research” and Tendering Policy Unit of Lviv City Council
- Training on the use of electronic service “Prozorro.Sales” for the entrepreneurs who work on the territory of municipal enterprise “Lviv central park of culture and leisure named after Bohdan Khmelnytskyi” in cooperation with Lviv Regulatory Hub
- Training on the prevention, identification and settlement of the conflict of interest



6  
trainings

>200  
participants



**Training on the conflict of interest in cooperation with the Centre for Political Studies and Analysis "Eidos", December 2019**

# 10

## Preparation of drafts of the Executive Committee Decisions

The Bureau has prepared the following drafts that have been later adopted by the Executive Committee:

- Draft of the decision on approval of the Code of conduct of the civil servants and other employees of Lviv City Council, its executive authorities, municipal enterprises, institutions and organizations.
- Draft of the decision “On anticorruption measures for the period of 2019-2020”.
- Draft of the decision on approval of the Protocol on receiving, registering and reviewing reports on violations of the Code of Conduct of the civil servants and other employees of Lviv City Council, its executive authorities, municipal enterprises, institutions and organizations.
- Draft of the Instruction on identification, prevention and settlement of the conflict of interests within Lviv City Council, its executive authorities, municipal enterprises, institutions and organizations.
- Draft of the decision on approval of the Protocol on the audit of estimates exercised by the Unit of financial control of the department ‘City Mayor’s Administration’ with the aim to install efficient control on the use of budgetary funds and funds of the municipal enterprises that are spent on works or services that are commissioned by executive bodies of Lviv city council, its municipal enterprises, institutions or organisations and performed by contractors, to minimise corruption risks and to standardise the procedure of estimates’ audit.
- Draft of the decision on approval of the Protocol on the organisation on the auction with the use of electronic system Prozorro. Sales for the purposes of renting separate constructive elements of amenities located within Lviv central park of culture and leisure named after Bohdan Khmelnytskyi in order to place temporary facilities or moveable constructions there.

In addition, two more drafts are pending approval:

- Draft of the Instruction on actions of civil servants and other employees of Lviv City Council, its executive authorities, municipal enterprises, institutions and organizations in the situations of violation of the principles of gender equality
- Draft of the Protocol on the procedure for processing of reports made by whistleblowers within LCC.

# 11

## Creation of the Bureau's internal documents

Apart from the documents that concern city council as a whole, during 2018-2020 the Bureau has been working on papers that specifically address the Bureau as such and facilitate its capacity building. These documents serve as a linking point between ideas of how the Bureau should function and their actual implementation. They help to set standards of internal processes such as the procedure for an interview for the purposes of corruption risk analysis.

- The Bureau's Constitution is a central internal document. It comprehensively explains the concept of the Bureau's work, including its tasks, mandated powers and governance structures. It is a growing document extended over time by other papers, namely "the protocols".
- The protocols clarify and detail the Constitution and form its integral part. These include, for instance, Draft protocol on corruption risk analysis, Draft protocol on interviewing, Draft protocol on an assessment of the reports through the Reporting System, Draft protocol on internal investigations etc. Creation of such documents is an ongoing process.

All of these documents put together, should form a sound system of Bureau's functioning and holistically describe the model that can later be used by other cities.



# 12

## Participation in meetings with LCC partners

Apart from the abovementioned Governance & Integrity International, the Bureau has established fruitful cooperation with:

- NGO “Transparency International Ukraine”
- Civil network “OPORA”
- NGO “Center for public monitoring and research”
- NGO “Eidos”
- Voluntary multi-stakeholder initiative “CoST Ukraine”
- Lviv IT School “LITs”
- International Finance Corporation (IFC)

The Bureau has also participated in a knowledge-sharing session with representatives of several NGOs from Kazakhstan



Likewise, the Bureau has closely cooperated with NAZK on the directions of work of the departments that specifically deal with issues of prevention and identification of corruption.



Initial meeting between the Bureau and IFC, October 2019

## Cooperation with IFC

The Bureau was invited by the Human Resources Department to assist LCC in meeting IFC requirements on

- Environmental & Social Action Plan (ESAP), prepared in connection with the proposed loans to Llivelektrotrans and Lvivadvtador. As a result of this cooperation the Bureau has prepared in consultation with IFC:
- Draft Code of Conduct for contractors
  - Draft Grievance mechanism of Llivelektrotrans
  - Draft LCC Sexual Harassment Policy
  - Training plan for trainings on Code of conduct, sexual harassment and gender-based violence.
  - Draft Antidiscrimination Policy of Llivelektrotrans

## 13

## Ensuring LCC employees' compliance with national anticorruption legislation

Last but not least, the Bureau has been serving as a major point of reference for LCC employees when it comes to their compliance with the requirements of national anticorruption legislation. In particular, the Bureau has been:

- Consulting LCC employees on the use of anticorruption legislation, including provisions related to the conflict of interest and financial control (more than 100 consultations were provided during 2018-2020)
- Overseeing timely submission of the employees' declarations required by the anticorruption legislation
- Keeping record of employees brought to criminal or administrative liability for corruption or corruption-related offences.



# Appendix: An outlook on the future steps

During the next year, the Bureau will continue to work on preventive cycle, which means that most of the operations described in this Report remain relevant for the day-to-day work of the Bureau's members. These include corruption risk analyses of the processes prone to corruption, regular workshops on the Code of Conduct, covering employees and managers of structural units, finalisation of a comprehensive Anticorruption strategy or work on ensuring transparency etc. For instance, during 2021 the Bureau plans to analyse the sphere of municipal property. Within this task, we will create a map of the processes vulnerable to corruption and perform an in-depth corruption risk analysis.

In addition, in 2021 we plan to continue implementation of the recommendations provided in the corruption risk analysis on the public procurement process.

We also aim to begin a fully-fledged investigatory work. This brings new challenges for our team, as we need to:

- gain expertise in this field, ideally through the training from both Ukrainian and foreign experts;
- expand the number of Bureau's employees by hiring at least 2 more people who would specifically deal with investigations;
- ensure the coherence of the Lviv City Council's documents regulating the repressive apparatus from the moment of receipt of a report to the decision on punishment.

In addition, after two years of a deliberately "silent" mode of its work (needed for the purposes of the capacity building), the Bureau plans to intensify its public communication. We would like to foster integrity and anticorruption discourse among local and state authorities, businesses and civil society organisations on a city level to unite our efforts in fighting corruption and promoting integrity.



# Our contacts

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