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Особенности реализации антикоррупционных программ в субъектах Российской Федерации

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Аннотация: Статья посвящена обобщению опыта формирования региональных антикоррупционных программ и выявлению особенностей их реализации на практике. Рассматривается также проблема соотношения региональных программ и антикоррупционной деятельности органов местного самоуправления. Показано, что на муниципальном уровне методы и направления противодействия коррупции аналогичны тем, что используются органами власти на региональном уровне. Исследованы как негативные, так и позитивные последствия совместного применения региональных и муниципальных антикоррупционных программ. Определяются основные направления, организационные проблемы реализации региональных антикоррупционных программ, особенности кадровой работы в рамках противодействия коррупции на региональном и местном уровнях. В статье также выделены такие основные проблемные направления противодействия коррупции в рамках кадровой работы в системе государственной и муниципальной службы, как: 1) антикоррупционное декларирование; 2) решение проблемы конфликтов интересов в системе государственной и муниципальной службы; 3) введение в систему противодействия коррупции антикоррупционных стандартов. На основе анализа практики реализации антикоррупционных программ регионального и местного уровней автор статьи доказывает, что необходимы их дальнейшее совершенствование в направлении систематизации и институционализации, более целостная координация антикоррупционной деятельности между уровнями субъектов Российской Федерации и органов местного самоуправления. А также необходима разработка единой методики определения основных показателей эффективности региональных и муниципальных антикоррупционных программ с целью объективной оценки результативности их реализации.
Ключевые слова: коррупция, антикоррупционная деятельность, антикоррупционная политика, региональные антикоррупционные программы

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PECULIARITIES OF THE IMPLEMENTATION OF REGIONAL ANTI-CORRUPTION PROGRAMS IN THE SUBJECTS OF RUSSIAN FEDERATION

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Abstract: The article is devoted to the generalization of the experience in formation of regional anti-corruption programs and the identification of the features of their implementation in practice. Also the problem of correlation of regional programs and anti-corruption activity of local self-government bodies is considered. It is shown that at the municipal level the methods and directions for counteracting corruption are similar to those used by the authorities at the regional level. Both negative and positive consequences of a joint application of regional and municipal anti-corruption programs were investigated. The main directions, organizational problems of implementation of regional anti-corruption programs, peculiarities of personnel work in the framework of counteraction to corruption at the regional and local levels are determined. The article also highlights such major problem areas of counteracting corruption in the frame of personnel work in the system of state and municipal service, as 1) anti-corruption declaration; 2) solving the problem of conflicts of interest in the system of state and municipal service; 3) introduction of anti-corruption standards into the anti-corruption system. Based on the analysis of the practice of implementing anti-corruption programs at the regional and local levels, the author of the article proves that further improvement is needed in the direction of systematization and institutionalization, more coherent coordination of anti-corruption activities between the levels of the subjects of the Russian Federation and local self-government bodies, as well as the implementation of system-wide measures laid by the federal legislation.
Keywords: corruption, anti-corruption activity, anti-corruption policy, regional anti-corruption programs

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Introduction

The development and implementation of comprehensive anti-corruption programs in the regions are one of the main tools for counteracting corruption at the subnational level [Analysis of the practice of implementing anti-corruption programs in the subjects of the Russian Federation, 2012]. A relatively effective way to achieve coordination and balance of anti-corruption activities of all authorities at the regional and local levels is program-targeted regulation. This efficiency is due to a complex of properties of program-targeted regulation that are not characteristic for normative and individual legal regulation.

The main distinguishing feature of the program-target regulation is that it creates an opportunity to test the qualitatively new means in the fight against corruption manifestations. At the same time, based on the monitoring of sources and conditions of corruption, the mechanisms of program regulation contribute to the introduction of integrated approaches to the implementation of anti-corruption programs [Zhukova, 2013].

Anti-corruption programs in the regions

The goal of introducing effective anti-corruption mechanisms at the level of the subjects of the Russian Federation was defined in 2005 within the framework of the Concept of Administrative Reform in the Russian Federation (in 2006-2010)[1]. In fact, regional anti-corruption programming began its development in the subjects of the Russian Federation only in 2008-2010.

The standard structure of the anti-corruption program at the level of the subject of the Federation in terms of mandatory elements, as a rule, contains the following sections:

- Introductory part (preamble);
- Definition of the main directions of legal regulation of anti-corruption activities;
- Substantial description of organizational and managerial decisions to improve the effectiveness of anti-corruption policy;
- Informational and propagandistic component of the program;
- Disclosure of the main mechanisms of state control over the implementation of the program;
- Description of the program's resource support;
- Determination of criteria to evaluate the effectiveness of implementation of the anti-corruption program;
- Formulating the expected results of the program.

The assessment of effectiveness plays a decisive role in the implementation of regional anti-corruption programs, corresponding to a set of criteria (or indicators), on the basis of which it is possible to draw conclusions about the ultimate or intermediate success of the implemented measures provided by the anti-corruption program. Among such evaluation criteria (indicators of program effectiveness) in the subjects of the Russian Federation most often are:

- improving quality and accessibility of public services for the population living in the subject of the Federation;
- reducing the costs of doing business by diminishing administrative barriers;
- increasing investment attractiveness and separate branches of economy of the subject of the Russian Federation;
- optimizing the budget expenditures in the region;
- growing tax revenues to the regional budget in comparison with the previous year;
- covering the executive authorities and local self-government bodies of the region by the criterion of introducing the internal monitoring and anti-corruption mechanisms system in personnel work;
- the number of draft legislative and other normative legal acts of the subject of the Russian Federation that have passed the expertise for corruption;
- the number of corruption offenses identified by officials and civil servants in a region;
- the results of interviews with citizens and organizations facing corruption in the state authorities of the regional and local self-government bodies;
- transparency indicators of the activities of the executive bodies of state power in the region.

In addition, the necessary component of any regional anti-corruption program is the mechanism for state control over the process of its implementation, which implies the existence of the pre-determined list of persons with authority to exercise such control, as well as the pre-established procedure and deadlines for the program executors to provide information on its implementation process and mechanisms to verify the reliability of the information received from executors (anti-corruption audit) [Zhukova, 2013].

The legal basis for anti-corruption programs

By now, we can state that the legal basis to combat corruption in the Russian regions has already been formed [Bratanovsky, Zelenov, 2016]. The regional anti-corruption laws that play the major role are adopted in all subjects of the Federation. As for the organization of the procedure to conduct anti-corruption expertise of regional normative legal acts, this anti-corruption measure at the level of the subjects of the Russian Federation is determined mainly by acts of subordinate level (resolutions by the legislative bodies of state power of the subjects of the Russian Federation, acts by senior officials or higher executive bodies of state power of the subjects of the Russian Federation)[2].

In the process of implementing regional anti-corruption programs, the following common problems are distinguished, which are characteristic for almost all regions of the Federation:

- It is impossible to attribute anti-corruption activities to the powers of federal or regional authorities, it implies the implementation of a comprehensive approach, while some of the measures to combat corruption may be the responsibility of the Russian Federation, the other part is the joint

1 The concept of administrative reform in the Russian Federation in 2006-2010, approved by the Decree of the Government of the Russian Federation of October 25, 2005 No. 1789-R // Collection of the legislation of the Russian Federation of November 14, 2005 No. 46. Art. 4720.

2 The relevant laws have been adopted only in certain subjects of the Russian Federation, for example, in the Ryazan region.

jurisdiction of the Federation and its subjects, some issues are the responsibility of the regions of the Federation or local self-government bodies [Vasiliev, 2012].

- The discrepancy of regional normative legal acts with federal legislation in various matters: from terminological discrepancies to direct contradictions (for example, in some regions the concept of anti-corruption expertise is limited only to the examination of draft documents, and regional legislation excludes examination of existing normative legal acts) [Brezhnev, 2014].
- Sometimes such a violation of federal legislation appears, which fixes the responsibility of the local government to finance certain anti-corruption measures organized by regional authorities.

Given problems lead to the emergence of conceptual contradictions in the matter of delineation of powers between the bodies of state power of the Russian Federation and the subjects of the Russian Federation. Therefore, there is an objective need for the formulation of unified rules and norms in the process of implementing regional anti-corruption programs.

At present, there are three main organizational models to coordinate anti-corruption activity: 1) the formation of a separate body (most often, under the governor, less often – with the highest executive body), vested with responsibility for the implementation of program activities (as a rule, the recommendations of this body are of an advisory nature); 2) consolidation of the coordinating function only to the apparatus of the highest official of the subject of the Federation; 3) realization of coordinating powers by the highest executive body of state power of the subject of the Russian Federation. Which model will be chosen by a different region depends on the specifics of the level of corruption manifestations in it, on the socio-economic characteristics and capabilities of this subject of the Federation, the availability of personnel capable of counteracting corruption, etc.

At the municipal level, the methods and directions of counteracting corruption are similar to those used by the authorities at the regional level. These include the legal regulation of anti-corruption activities, monitoring compliance with the procedure for passing municipal service (including compliance with prohibitions and restrictions established by the current legislation), monitoring of corruption activity based on citizens' appeals, anti-corruption expertise, encouraging the anti-corruption activity of public and civil institutions, etc.

The key to a successful anti-corruption strategy is to build a system of joint anti-corruption activities for all levels of participants. This entails the need for coordinated activities of state and municipal governments, which implies a certain correlation of regional and municipal anti-corruption programs. Such a relationship can have different legal forms. Most often local governments are considered in regional anti-corruption programs as executors [Implementation of anti-corruption programs at the municipal level, 2013]. Thus, the resolutions of the heads of regional administrations approving these programs usually refer to local level administrations with a request to develop similar municipal programs. Another option: the regional anti-corruption program instead of such a request already contains information that local level administrations are co-executors of the program, or includes a recommendation for local level administrations to participate in the implementation of the regional anti-corruption program.

Current problems in conducting anti-corruption activities

The immediate obligation of the regional government bodies to stimulate the anti-corruption activities of local authorities in federal legislation is absent. But this obligation is implicit in the Decree of the President of the Russian Federation of March 13, 2012 No. 297 "On the National Plan for Combating Corruption in 2012-2013 and amending certain acts of the President of the Russian Federation on anti-corruption issues".[3] In this Decree, all authorized representatives of the President of the Russian Federation in the federal districts are instructed to analyze the measures taken by the state authorities of the subjects of the Russian Federation to counter corruption in local government bodies, while giving special attention to measures to eliminate the conditions for the emergence of domestic corruption. Thus, the obligation under consideration in this interpretation shows why the authorities of the regions of the Federation see their anti-corruption programs as a substantial basis for anti-corruption programs at the local level [Sheverdyaev, 2017].

Investigating the specifics of implementation and practice of applying for regional and municipal anti-corruption programs, another organizational problem is highlighted - the lack of a clear delineation of the levels and types of local government bodies, leading to a vague definition of their role in implementing anti-corruption programs. In the federal anti-corruption legislation, the concept of local government is used only in a general sense, and in regional programs, as a rule, the administrations of municipal districts and urban districts are mentioned, while the institutions of rural and urban settlements are not used in programs in general. This leads to a very uneven amount of anti-corruption work imposed on the settlement bodies (in relation to the resources available to their administrations) [Sheverdyaev, 2017].

There are, however, some positive changes as a result of the joint application of regional and municipal anti-corruption programs. One of the most significant results is the formation of joint state-municipal institutions, one of which was the Institute of Multifunctional Centers for the provision of state and municipal services (MFC)[4], which in practice

3 Decree of the President of the Russian Federation of March 13, 2012 No. 297 (ed. on March 19, 2013) "On the National Plan for Combating Corruption in 2012-2013 and Amending Certain Acts of the President of the Russian Federation on Anti-Corruption" // Collection of the legislation of the Russian Federation of March 19, 2012 No. 12, Art. 1391.

4 The current basis for the formation and functioning of the MFC in the Decree of the Government of the Russian Federation of December 22, 2012 No. 1376 "On the approval of the rules for organizing the activities of multifunctional centers for the provision of public and municipal services". See Resolution of the Government of the Russian Federation of December 22, 2012 No. 1376 "On Approval of the Rules for the Organization of Multifunctional Centers for the Provision of State and Municipal Services" // Collection of the legislation of the Russian Federation of December 31, 2012 No. 53 (Part 2). Art. 7932.

allowed reducing corruption, including the corruption of domestic orientation. In fact, such centers are municipal budget organizations, but at the same time, as a rule, the corresponding subject of the Federation participates in their formation. That is why the establishment of such centers provides, as a rule, both municipal and regional anti-corruption programs. The functioning of the MFC allowed minimizing the contact work of state and municipal officials with the consumers of the corresponding services, which reduced the level of corruption activity in the regions as a whole.

Directions of personnel work in the framework of regional anti-corruption activities

An important role in combating corruption, carried out by joint efforts of state authorities of the regions of the Russian Federation and local self-government, is also played by personnel work in the system of state and municipal service. It includes three main ideas: 1) anti-corruption declaration, that is, the declaration of information about the incomes and property of state and municipal employees and members of their families; 2) solving the problem of conflicts of interest in the system of state and municipal service; 3) introduction of anti-corruption standards into the anti-corruption system.

Let us consider each of these directions. In the first direction – the declaration of information about the incomes and property of state and municipal employees and members of their families – it is assumed that this system should be aimed both at obtaining information about the presence of a conflict of interest and on any manifestations of corruption activity. Art. 8 of the Federal Law of December 25, 2008 No. 273-FZ "On Counteracting Corruption" requires the citizens applying for the replacement of posts of the state or municipal service included in the list established by the regulatory legal acts of the Russian Federation, as well as employees who substitute the posts of the state or municipal service included in the list established by the regulatory legal acts of the Russian Federation, to fulfill the obligation to provide information on their income/expenses, property and liabilities of property nature and on income/expenses, property and liabilities of property nature of their spouse and minor children. Federal laws and other normative legal acts of the Russian Federation also establish the procedure for the submission of this information.[5]

At the level of the subjects of the Federation, although there are relatively many different normative legal acts that somehow affect the control over the incomes of public servants and their family members, nevertheless, there is no main legislative act – a document determining the order of bringing this information to the public (placing these data on official websites of the executive bodies of state power of the subjects of the Federation and the possibility of their transfer to the mass media) [Epifanova, Polozkov, 2017]. This, in turn, limits the opportunities for public control over the incomes of regional officials. For local governments in the sphere of declaring income information, the federal legislation prescribes to be guided by the relevant normative legal acts of the level of the subjects of the Federation[6].

In the area of anti-corruption declaration, there is also another organizational and legal problem that does not allow fulfilling the requirement of Art. 5 (Part 5) of the Federal Law No. 273- FZ "On Counteracting Corruption" regarding the transfer of data on corruption manifestations by the bodies for coordinating anti-corruption activities to the relevant state bodies authorized to verify such data and to take decisions on the results of inspections.[7] This procedure for the transfer of such data in regional normative legal acts is not regulated in any way, despite the fact that regional commissions create committee on the observance of requirements for the conduct of civil servants and conflict of interest, one of the main functions of which, as a rule, is the identification of problems incomplete or unreliable provision of state employees with information on income, property or liabilities of a property nature. Unclear and weak regulation of this procedure, therefore, does not allow observing the principles of legality, publicity, and objectivity in its conduct. Thus, for example, the procedure does not exclude the possibility of pressure on members of commissions to comply with anti-corruption requirements for the conduct of civil servants by higher-level officials.

Therefore, in the field of anti-corruption declaration both at the regional and local levels, two main problems can be identified:

The actual lack of opportunities for public control over compliance with the requirements of anti-corruption legislative norms for declaring information on income, property obligations of state and municipal employees[8]. Verification of the authenticity and completeness of this information under the current legislation is possible only as a result of the decision of the representative of the employer (manager), while the independent regulatory and legal anti-corruption system does not provide for independent bodies authorized

5 Federal Law of December 25, 2008 No. 273-FZ "On Countering Corruption" (with amendments and additions) // Rossiyskaya Gazeta. 2008. December 30.

6 Federal Law of March 2, 2007 No. 25-FZ (as amended on July 26, 2017) "On municipal service in the Russian Federation" (amended and supplemented, effective from January 1, 2018) // Collection of legislation of the Russian Federation of March 5, 2007 No. 10. Art. 1152. Federal Law of December 3, 2012 No. 230-FZ "On Control over the Correspondence of Expenditures of Persons Who Substitute Public Positions and Other Persons to Their Incomes" // Rossiyskaya Gazeta. 2012. December 5.

7 Federal Law of May 7, 2013 No. 102-FZ "On Amendments to Certain Legislative Acts of the Russian Federation in Connection with the Adoption of the Federal Law "On the prohibition of certain categories of persons to open and maintain accounts (deposits), keep cash and valuables in foreign banks located outside the territory of the Russian Federation, to own and (or) use foreign financial instruments" // Collection of the legislation of the Russian Federation of May 13, 2013 No 19, Art. 2329.

8 Decree of the Government of the Russian Federation of July 5, 2013 No. 568 "On the extension to certain categories of citizens of restrictions, prohibitions and duties established by the Federal Law "On Combating Corruption" and other federal laws in order to counter corruption" // Collection of the legislation of the Russian Federation of July 15, 2013 No. 28. Art. 3833.

to initiate such inspections[9]. Opportunities for such initiation must be provided to the mass media since they are the ones that are most capable of informing society as a whole. Moreover, the existing rules for declaration and the mechanism for verifying the reliability and completeness of the information presented in the declaration, excluding public control, entail a more global problem – violation of the citizens' right to local self-government, established by the Constitution of the Russian Federation and Federal Law of October 6, 2003 No. 131-FZ (ed. on December 29, 2017) "On the general principles of the organization of local self-government in the Russian Federation"[10]. This demonstrates another important problem affecting income declaration as an instrument of anti-corruption policy: the development of a civil society system that is provided not only with access to information but also with a political space that would ensure that relevant institutions of civil society are included in anti-corruption mechanisms at the regional and local levels, but would exclude at the same time illegal interference in the activities of civil servants.

Insufficient organizational and legal basis for the procedure of collecting, verifying and publishing information on the incomes of public servants and members of their families. To date, the procedure for declaring income, property, and liabilities of property as an instrument to counter corruption requires special attention and deeper improvement.

The second direction of personnel work in the field of countering corruption in the regions is preventing and resolving conflicts of interest in the state and municipal service – it is also one of the most important areas of personnel work in the subjects of the Federation and local self-government bodies. The importance of this direction is determined by the steady public need for increasing confidence in state institutions, the need to implement the principles of publicity and openness of the activities of the authorities, and the formation of conditions for conscientious performance of official duties by state and municipal employees. The notion of conflict of interests implies that an official in the state or municipal service has a personal or group interest that affects the process of making decisions and leads to a contradiction between his personal interests and the legitimate interests of society. Legislatively, this concept is stated in Art. 19 of Federal Law of July 27, 2004 No. 79-FZ (ed. on February 14, 2010) "On the State Civil Service of the Russian Federation"[11]. Also, the notion of a conflict of interest was legislatively stated for the municipal service as well. Thus, in Federal Law of December 22, 2008 No. 25-FZ "On Municipal Service in the Russian Federation", Art. 14.1 "Settlement of conflicts of interest in the Municipal Service"[12] appeared.

So, at present, in the legal system of the Russian Federation, which forms the basis for the anti-corruption activities of the authorities at all levels, the task of regulating the conflict of interests and extending such norms to all officials participating in the activities of state bodies is gradually being resolved. At the same time, it should be noted that in Russia there is still no separate regulatory legal act overseeing the problem of conflict of interests in the state and municipal service, and all norms related to this issue are fragmentarily contained in normative legal acts of various levels.

The third direction of personnel work in the framework of regional anti-corruption activities is the development and implementation of anti-corruption standards, the necessity for which arose as a result of the formation of a single system of prohibitions and restrictions to counter corruption. This need is legislated for the first time in the Federal Program "Reforms and Developing of the Civil Service System of the Russian Federation (2009-2013)", approved by the Decree of the President of the Russian Federation of March 10, 2009 No. 261[13]. Anti-corruption standards include institutionalized prohibitions, restrictions and requirements, the observance of which forms a stable anticorruption behavior of officials, initiating a personal aversion to corruption by these officials and actions on their part to prevent corruption manifestations [Basnak, 2017; Iliy, 2017].

The legal framework for anti-corruption standards

The legal framework for the development and implementation of anti-corruption standards is formed by two main laws: 1) Federal Law of December 25, 2008 No. 273-FZ "On Countering Corruption"[14]; 2) Federal Law of July 27, 2004 No. 79-FZ "On State Civil Service of the Russian Federation"[15]. This legal basis was further developed in the National Anti-Corruption Plans, approved by the Decrees of the President of the Russian Federation. So, in the plan for 2012-2013 (the Decree of the President of March 13, 2012 No. 297), it is decided to

9 Decree of the Government of the Russian Federation of January 9, 2014 No. 10 "On the procedure for the communication of certain categories of persons about the receipt of a gift in connection with their official position or the performance of their official (official) duties, the delivery and evaluation of the gift, the sale (repurchase) and the transfer of funds from its implementation" // Rossiyskaya Gazeta. - 2014. - January 14.

10 Federal Law of October 6, 2003 No. 131-FZ (as amended on December 29, 2017) "On General Principles of Organization of Local Self-Government in the Russian Federation" // Collection of the legislation of the Russian Federation of October 6, 2003 No. 40. Art. 3822.

11 Federal Law of July 27, 2004 No. 79-FZ "On the Civil Service in the Russian Federation" (with amendments and additions) // Collection of the legislation of the Russian Federation of August 2, 2004 No. 31, Art. 3215.

12 Federal Law of March 2, 2007 No. 25-FZ (ed. on July 26, 2017) "On municipal service in the Russian Federation" (amended and supplemented, effective from January 1, 2018) // Collection of the legislation of the Russian Federation of March 5, 2007 No. 10. Art. 1152.

13 Decree of the President of the Russian Federation of March 3, 2009 No. 261 (edited on August 10, 2012) "On the federal program "Reforming and developing the public service system of the Russian Federation (2009 - 2013)" // Collection of the legislation of the Russian Federation of March 16, 2009 No. 11. Art. 1277.

14 Federal Law of December 25, 2008 No. 273-F3 "On Countering Corruption" (with amendments and additions) // Rossiyskaya Gazeta. 2008. December 30.

15 Federal Law of July 27, 2004 No. 79-FZ "On the Civil Service of the Russian Federation" (with amendments and additions) // Collection of the legislation of the Russian Federation of August 2, 2004 No. 31, Art. 3215.

formulate proposals on the procedure for the dissemination of anti-corruption standards not only for state and municipal employees, but also for those officials who replace certain positions in organizations, created to implement the tasks that are facing the federal government bodies[16]. The plan for 2016-2017 (the Decree of the President of the Russian Federation of April 1, 2015 No. 147) underscores the need to unify anti-corruption standards for employees of state corporations, extra-budgetary funds, and other organizations that are created in connection with the need dictated by federal legislation to address tasks assigned to federal state bodies[17]. Also, the plan 2016-2017 formulates the need to introduce anti-corruption standards for employees of subsidiaries of state corporations.

In the subjects of the Russian Federation, anti-corruption standards are independently developed and approved for state civil servants of certain bodies and for municipal employees. As a rule, regional bills, formalizing the application of anti-corruption standards in a specific region of the Russian Federation, unite bans, restrictions, duties of civil servants, enshrined in the current federal legislation. In all regions, the basis for standards is maintaining the status and forming the basic rules of conduct aimed at the conscientious performance by public servants of their official duties. The main part of the standards is formed by prohibitions and restrictions, the observance of which allows preserving the social functions of the civil service and excluding possible deviations from the provisions of the official regulations that are a sign of corrupt behavior.

Conclusion

As a whole, the fragmented and contradictory approaches to the definition of the concept of anti-corruption standards and the mechanism for their implementation in the subjects of the Federation demonstrate the lack of common principles, rules and content to the formation and implementation of anti-corruption standards, which contradicts the very concept of a standard that suggests that anti-corruption standards should be defined and implemented uniformly throughout the country, regardless of regional differentiation in the understanding of this important anti-corruption mechanism activities.

Thus, anti-corruption activities of the subjects of the Russian Federation in general, and anti-corruption programs at the regional and local levels, as well as analysis of the practice of their implementation, show that their further improvement in the direction of systematization and institutionalization is necessary. And also more holistic coordination of anti-corruption activity between the levels of the subjects of the Federation and local self-government bodies is required. In addition, to the implementation of system-wide measures laid down by federal legislation, it is necessary to develop a unified methodology for determining the main indicators of effectiveness of regional and municipal anti-corruption programs with a purpose to an objective assessment of the effectiveness of their implementation.

16 Decree of the President of the Russian Federation of March 13, 2012 No. 297 (ed. on March 19, 2013) "On the National Plan for Countering Corruption in 2012-2013 and Amending Certain Acts of the President of the Russian Federation on Anti-Corruption" // Collection of the legislation of the Russian Federation of March 19, 2012 No. 12, Art. 1391.

17 Decree of the President of the Russian Federation of April 1, 2016 No. 147 "On the National Plan for Counteracting Corruption for 2016-2017" // Rossiyskaya Gazeta. 2016. April 13.

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