

**PRIVATE JOINT-STOCK COMPANY "HIGHER EDUCATIONAL
INSTITUTION "INTERREGIONAL ACADEMY OF PERSONNEL
MANAGEMENT"**

APPROVED:

Academic Council of PJSC "IAPM"

protocol № 04 of 25.05.2022

Chairman of the Academic Council

President of IAPM _____

Rostyslav Shchokin

RULES

**for ensuring the confidentiality of persons during the
processing of reports of possible facts of violations related
to corruption and other violations in the Private Joint
Stock Company "Higher Educational Institution
"Interregional Academy of Personnel Management"**

Kyiv - 2022

1.General provisions

The Rules for ensuring the confidentiality of persons during the processing of reports of possible facts of corruption-related violations and other violations in the PJSC "IAPM" (hereinafter referred to as the Rules) determine the internal procedures and mechanisms and the sequence of actions of employees of the Private Joint Stock Company "Higher Educational Institution "Interregional Academy of Personnel Management" (hereinafter referred to as the Academy) when accepting, preliminary review and registration of reports of possible facts of corruption or corruption-related offences, other violations that come to the attention of the

These Rules are developed in accordance with the Law of Ukraine "On Prevention of Corruption", "On Principles of Prevention and Combating Discrimination in Ukraine", Methodological Recommendations for the Application of Certain Provisions of the Law of Ukraine "On Prevention of Corruption" regarding the Prevention and Settlement of Conflicts of Interest, Compliance with Restrictions on the Prevention of Corruption, approved by the Order of the National Agency for the Prevention of Corruption dated 02.04.2021 No. 5, Regulations on the Procedure and Procedures for Settlement of Conflict Situations in a Private Joint Stock Company

In these Rules, the terms are used in the following meanings:

whistleblower - an individual who, if he/she is convinced that the information is reliable, has reported possible facts of corruption or corruption-related offences, other violations committed by another person, if such information became known to him/her in connection with his/her labour, professional, economic, social, scientific activities, service or training or his/her participation in the procedures provided for by law, which are mandatory for the commencement of such activities, service or training;

anonymous report - a report on possible facts of corruption or corruption-related offences, other violations made without specifying the author (anonymously);

report on corruption - a report containing information about possible facts of corruption or corruption-related offences, other violations committed by the Academy officials;

preliminary review - review of the information provided in the report of violation, as well as analysis of such information in order to determine the structural unit responsible for reviewing such a report in accordance with its powers.

A report on possible facts of corruption or corruption-related offences or other violations shall contain factual data that can be verified.

These Rules do not apply to the adoption, preliminary review and registration of documents, the procedure for review of which is regulated by special laws of Ukraine.

2. Responsibilities of the head of the institution to ensure the confidentiality of persons reporting violations (whistleblowers)

The main task of the head of the Academy to ensure the confidentiality of whistleblower reports is to exclude access to the whistleblower reports of any officials and employees, except for employees responsible for registration and consideration of reports, which are determined by the order of the institution.

In order to fulfil this task, the Head of the Academy is obliged to:

- 1) by the order of the institution, appoint an employee responsible for registering whistleblower reports;
- 2) by the order of the institution, determine the person (unit) responsible for consideration and resolution of whistleblower reports;
- 3) to organise internal investigations into the facts of illegal disclosure or other use by the Academy's employees of information about the whistleblower, his/her close persons or information that may identify the whistleblower.

3. Responsibilities of the Academy employees to ensure confidentiality of persons reporting violations (whistleblowers)

Each employee of the Academy who receives and considers the whistleblower's report shall be personally responsible for keeping confidential information about the whistleblower, his/her close relatives or information that may identify the whistleblower.

The Academy employee shall be obliged to:

- 1) keep secret information about the whistleblower, his/her close relatives or information that may identify the whistleblower;
- 2) comply with the rules for the use of confidential information;
- 3) to use reports of possible facts of corruption or corruption-related offences, other violations and documents containing information about the whistleblower, his/her close persons or information that may identify the whistleblower in such a way as to prevent other persons from getting acquainted with them;
- 4) in case of leaving the office, report of violation and other documents containing information about the whistleblower, his/her close persons or information that may identify the whistleblower, shall be kept in a metal safe (cabinet).

4. Acceptance of reports of possible facts of corruption or corruption-related offences and other violations received through internal reporting channels

Reports of violations received through internal reporting channels: a special telephone line, a special e-mail, the Academy's website, shall be received by the authorised unit (authorised person).

Information about the special telephone line and hours of reception of reports of violations, special e-mail, and the link to the website where reports are received shall be posted on the official website of the Academy.

Preliminary consideration of notifications shall be carried out by the authorised unit (authorised person).

After preliminary review, the reports shall be submitted to the designated responsible official of the relevant unit of the institution for registration on the day of their receipt or no later than the next business day.

Acceptance of reports of possible facts of corruption or corruption-related offences and other violations received through regular reporting channels

Reports of possible facts of corruption or corruption-related offences and other violations received through regular reporting channels: a special telephone line, special e-mail, the institution's website, shall be received by the authorised unit (authorised person).

Information on the special telephone line and hours of reception of reports, special e-mail, and the link to the website where reports of corruption are received shall be posted on the official website of the Academy.

Preliminary consideration of reports shall be carried out by the authorised unit (authorised person).

After preliminary consideration of reports of possible facts of corruption or corruption-related offences, other violations, on the day of their receipt or no later than the next working day, they shall be transferred to the designated responsible official of the relevant unit of the Academy for registration.

5. Acceptance of reports of possible facts of corruption or corruption-related offences, other violations received by other means of communication

The reports received by the Academy through the general e-mail, mailbox, postal means and received at the personal reception of citizens shall be accepted by the relevant structural unit of the Academy, which shall carry out their preliminary consideration and registration.

6. Registration of reports of possible facts of corruption or corruption-related offences and other violations

The notification shall be registered by the relevant structural subdivision of the Academy in the relevant registration logs, the date of registration and the relevant registration index shall be affixed to the notification.