



IAPM
Interregional Academy of
Personnel Management



**SUSTAINABLE
DEVELOPMENT
GOALS**

APPROVED

Academic Council of the
Interregional Academy of Personnel
Management

26 February 2020, Protocol No. 2

REVIEWED

Academic Council of the
Interregional Academy of Personnel
Management

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RULES

ensuring the confidentiality of individuals during the processing of reports on possible facts of violations related to corruption, discrimination, and other violations in the Interregional Academy of Personnel Management

1. General provisions

The rules for ensuring the confidentiality of individuals during the processing of reports about possible violations related to corruption, discrimination and other violations in PJSC "Higher Education Institution "IAPM" (hereinafter - the Rules) determine the internal procedures and mechanisms and the sequence of actions of the employees of the Private Joint-Stock Company "Higher Educational Institution "Interregional Academy of Personnel Management" (hereinafter – the Academy) when receiving, preliminary consideration and registration of reports about possible facts of corruption, discrimination -related offenses, other violations that come to the institution through internal and regular channels of reports, other means of communication (through the general e-mail, mailbox for correspondence, means of postal communication and received at a personal reception).

These rules are developed in accordance with the Law of Ukraine "On the Prevention of corruption, discrimination", "On the Principles of Prevention and Counteraction of Discrimination in Ukraine", Methodological recommendations on the application of certain provisions of the Law of Ukraine "On the Prevention of corruption, discrimination" regarding the prevention and settlement of conflicts of interest, compliance with restrictions on the prevention of corruption, discrimination, approved by the order of the National Agency for the Prevention of corruption, discrimination dated 04/02/2021 No. 5, Regulations on the Procedure and Procedures for the Resolution of Conflict Situations in the Private Joint-Stock Company "Higher Educational Institution "Interregional Academy of Personnel Management", other regulatory documents.

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

whistleblower - a natural person who, in the presence of conviction that the information is reliable, reported possible facts of corruption, discrimination-related offenses, other violations committed by another person, if such information became known to her in connection with her work, professional, economic, public, scientific activities, her service or training, or her participation in procedures prescribed by law, which are mandatory for starting such activities, completing service or training;

anonymous notification – a notification about possible facts of corruption, discrimination-related offences, other violations, made without specifying authorship (anonymously);

notification of corruption, discrimination – a notification that contains information about possible facts of a corruption, discrimination-related offence, other violations committed by officials of the Academy;

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

Notification of possible facts of corruption, discrimination-related offenses and other violations must contain factual data that can be verified.

The effect of these Rules does not extend to the acceptance, preliminary consideration and registration of documents, the procedure for consideration of which is regulated by special laws of Ukraine.

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

The main task of the head of the Academy in ensuring the confidentiality of whistleblower reports is to exclude the admission and access to 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 fulfill this task, the head of the Academy is obliged to:

1) by order of the institution, determine the employee responsible for registering whistleblower reports;

2) by order of the institution, determine the person (department) responsible for considering and resolving whistleblower reports;

3) to organize official investigations into the facts of illegal disclosure or use in another way by Academy employees of information about the whistleblower, his relatives or information that can identify the person of the whistleblower.

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

Each employee of the Academy who accepts and considers the whistleblower's report bears personal responsibility for keeping secret information about the whistleblower, his or her relatives or information that can identify the whistleblower.

An employee of the Academy is obliged to:

1) to keep confidential information about the whistleblower, his relatives or information that can identify the whistleblower;

2) comply with the rules for using confidential information;

3) use reports on possible facts of corruption, discrimination or corruption, discrimination-related offenses, other violations and documents that contain information about the whistleblower, his relatives or information that can identify the person of the whistleblower, in such a way as to make it impossible for other persons to get acquainted with them;

4) in the case of leaving the work office, the notice of violation, other documents containing information about the whistleblower, his relatives or information that can identify the person of the whistleblower, should be closed in a metal safe (closet).

4. Acceptance of reports on possible facts of corruption, discrimination or corruption, discrimination-related offenses, other violations received through internal reporting channels

Notifications of violations received through internal notification channels: a special telephone line, a special e-mail, the website of the Academy, are accepted by an authorized unit (authorized person).

Information about a special telephone line and hours for receiving notifications of violations, a special e-mail, about a link on the website, which is used to receive notifications, is posted on the Academy's official website.

Preliminary consideration of messages is carried out by an authorized unit (authorized person).

After preliminary consideration, the notices are sent 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 working day.

Acceptance of reports on possible facts of corruption, discrimination or corruption, discrimination-related offenses, other violations received through regular

reporting channels

Notifications about possible facts of corruption, discrimination or corruption, discrimination-related offences, other violations received through regular notification channels: a special telephone line, a special e-mail, the website of the institution, are accepted by the authorized unit (authorized person).

Information about a special phone line and hours of receiving messages, a special e-mail, and a link to the website for accepting corruption, discrimination reports is posted on the Academy's official website.

Preliminary consideration of messages is carried out by an authorized unit (authorized person).

After preliminary consideration of reports on possible facts of corruption, discrimination or corruption, discrimination-related offenses, other violations on the day of their receipt or no later than the next working day, they are forwarded to the designated responsible official of the corresponding division of the Academy for registration.

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

Messages that arrive at the Academy via general e-mail, a mailbox for correspondence, by means of postal communication and received at a personal reception of citizens are accepted by the corresponding structural division of the Academy, which carries out their preliminary review and registration.

6. Registration of reports on possible facts of corruption, discrimination or corruption, discrimination-related offenses, other violations

The notification is registered by the corresponding structural unit of the Academy in the corresponding registration journals, the date of registration and the corresponding registration index are attached to the notification.