



КИЇВСЬКИЙ МЕДИЧНИЙ УНІВЕРСИТЕТ  
KYIV MEDICAL UNIVERSITY  
EST.1992

**ANTI-CORRUPTION PROGRAM  
PHEE "KYIV MEDICAL UNIVERSITY"  
for 2025-2030**

**Kyiv 2025**

## **1. General provisions**

**1.1.** The Anti-Corruption Program of Kyiv Medical University (hereinafter referred to as the Anti-Corruption Program) has been developed in accordance with the Constitution of Ukraine, the Law of Ukraine "On Higher Education", the Law of Ukraine "On Prevention of Corruption" and other regulatory legal acts of the anti-corruption legislation of Ukraine.

**1.2.** The anti-corruption program applies to all employees of Kyiv Medical University (hereinafter referred to as the University).

**1.3.** All terms in this Anti-Corruption Program are used in accordance with the Law of Ukraine "On Prevention of Corruption" (hereinafter referred to as the Law).

**1.4.** The implementation of the Anti-Corruption Program at the University is carried out by the Commissioner for the Prevention and Detection of Corruption (hereinafter referred to as the Commissioner), who is appointed by order of the President.

**1.5.** The purpose of the Anti-Corruption Program is to ensure the functioning of an effective system for preventing and combating corruption, and compliance of the University's activities with the requirements of anti-corruption legislation, taking into account best international practices.

## **2. Anti-corruption measures and the procedure for their implementation**

**2.1.** The list of anti-corruption measures implemented at the university to ensure compliance with the requirements of the anti-corruption legislation of Ukraine, and the procedure for their implementation are determined by the Plan of Measures aimed at preventing, combating and detecting corruption at the University, which is approved by the President of the University.

## **3. Norms of professional ethics for University employees**

**3.1.** University officials undertake to establish zero tolerance for corruption among employees by setting a personal example of ethical behavior, which is the basis of the university's business culture, everyday business practices, and business reputation.

All university employees, while performing their official duties, are required to strictly comply with the requirements of current legislation and generally recognized ethical standards of behavior, to be polite in relations with citizens, managers, colleagues and subordinates. A position with a high and increased level of corruption risks is the position of the university rector.

**3.2. University officials, when performing their official duties, are obliged to:**

- adhere to political neutrality, avoid demonstrating one's own political beliefs or views in any way, and not use official powers in the interests of political parties or their branches or individual politicians;

- adhere to general (common) and specific standards of ethical behavior, University rules;

- not to disclose or otherwise use confidential and other restricted information that has become known to them in connection with the performance of their official powers and professional duties, except as provided by law;

- not to use their official powers, position, any property or funds of the University for private interests or to obtain improper benefit;

- to act regardless of personal interests, personal attitude towards any persons, political, ideological, religious or other personal views or beliefs;

- Refrain from implementing decisions or instructions from management if they contradict the law.

#### **4. Rights and obligations of the University employees in connection with the prevention and counteraction of corruption in their activities**

**4.1.** University employees enjoy all rights provided for by current anti-corruption legislation.

**4.2.** Officials and employees of the University, other persons who perform work and are in employment relations with the University, **are obliged to:**

- 1) not to commit or participate in the commission of corruption offenses related to the activities of the University;

- 2) refrain from behavior that may be regarded as a willingness to commit a corruption offense related to the activities of the University;

3) immediately inform the authorized person, the rector of the University, about cases of incitement to commit a corruption offense related to the activities of the University;

4) immediately inform the authorized person, the rector of the University, about cases of corruption or corruption-related offenses committed by the University employees;

5) comply with other requirements stipulated by the current anti-corruption legislation.

## **5. Rights and obligations of the Commissioner as an official responsible for preventing corruption**

**5.1.** The Commissioner, as an official responsible for preventing corruption, is guided in his activities by the Constitution of Ukraine, the Law and other regulatory legal acts of anti-corruption legislation.

**5.2.** The rights and obligations of the authorized person are determined by the Law, the Regulations on the authorized person for the prevention and detection of corruption of the Higher Educational Establishment "Kyiv Medical University".

## **6. Procedure for proper supervision, control and monitoring of compliance with the anti-corruption program in the activities of the University**

**6.1.** For proper supervision, control and monitoring of compliance with the anti-corruption program in the activities of the University, as well as assessment of the results of the implementation of the envisaged measures, the Commissioner may require officials and employees of the University to provide oral and written explanations on their compliance with the Anti-Corruption Program, and receive any documents that are important for establishing the fact of the presence/absence of signs of a corruption offense in the actions of officials.

**6.2.** The university management provides an assessment of the results of proper supervision, control, and monitoring of compliance with the Anti-Corruption Program.

**7. Confidentiality conditions for informing the authorized person by the University employees about the facts of inciting them to commit a corruption offense or about corruption or corruption-related offenses committed by other employees or persons**

**7.1.** Any data that makes it possible to identify a person who reported to the Commissioner about the facts of incitement to commit a corruption offense or about the commission of corruption or corruption-related offenses by other employees or persons is confidential information and is protected in accordance with applicable law.

**7.2.** A person guilty of disclosing confidential information is liable under applicable law.

**8. Procedure for protecting employees who have reported information about a corruption or corruption-related offense**

**8.1.** The procedure for protecting employees who have reported information about a corruption or corruption-related offense is carried out in accordance with Section 8 "Whistleblower Protection" of the Law.

**8.2.** Any information regarding an employee who has reported a corruption or corruption-related offense may not be disclosed, except as required by law.

**8.3.** In the event of disclosure of confidential information about a person who reported a corruption or corruption-related offense, upon the request of such a person, the President of the University must take all urgent measures to avoid negative consequences for him or her associated with such disclosure.

**9. Procedure for conducting individual counseling authorized by the University employees for the application of anti-corruption standards and procedures**

**9.1.** Any employee of the University has the right to contact the Commissioner to receive written or oral advice on the application of anti-corruption standards and procedures.

**9.2.** In order to receive oral consultation, the University employee contacts the authorized person 2 working days before the scheduled meeting date to agree

on the time and place of the meeting.

**9.3.** In order to obtain advice, a University employee shall apply to the Commissioner with a written request for advice on the application of anti-corruption standards and procedures. The Commissioner shall be obliged to respond to the request within 5 working days (due to the complexity of the issue, this period may be extended, but not more than 5 working days).

**10. Procedure for conducting periodic advanced training  
University employees in the field of preventing and combating  
corruption**

**10.1.** By decision of President of the University, in order to increase the level of knowledge and qualifications of the University employees in the field of preventing and combating corruption, the Commissioner annually conducts seminars for University employees, the subject of which is to explain the norms of the University's Anti-Corruption Program and current anti-corruption legislation.

**10.2.** Employees are notified of the date of such seminars 10 working days before the scheduled date of the event.

**10.3.** To raise awareness of the University's employees and students on anti-corruption legislation, an authorized person carries out anti-corruption measures (lectures, conversations, explanations, etc.) approved by the Annual Action Plan aimed at preventing, countering and detecting corruption at the University.

**10.4.** Newly appointed employees are required to familiarize themselves with the provisions of the Law, this Anti-Corruption Program, and the internal documents of the University adopted for its implementation.

**11. Application of disciplinary measures to the University employees who  
violate the provisions of the Anti-Corruption Program**

**11.1.** If the authorized person discovers or establishes a violation of the University's Anti-Corruption Program, he or she shall submit a written appeal to the President of the University. In the appeal, the authorized person shall state the

facts of the violations discovered.

**11.2.** The President of the University makes a decision to impose disciplinary action on an employee who has violated the requirements of the University's Anti-Corruption Program in accordance with current legislation.

**12. Procedure for taking response measures regarding detected facts of corruption or corruption-related offenses**

**12.1.** If an authorized person or employee discovers a fact of corruption or a corruption-related offense, he or she is obliged to immediately notify President of the University and, if the actions of another employee show a sign of a crime, to notify the relevant authorities.

**13. Procedure for making amendments to the Anti-Corruption Program**

**13.1.** Changes to the University's Anti-Corruption Program are made by order of President after a preliminary discussion of the draft changes with the University employees at the University's Academic Council.

**14. Corruption Risk Assessment. Assessment Working Group corruption risks.**

**14.1.** The assessment of corruption risks in the University's activities is carried out in accordance with the Law and other acts of current anti-corruption legislation.

**14.2.** An assessment of corruption risks in the University's activities is carried out at least once a year.

**14.3.** The assessment of corruption risks in the University's activities is carried out by the working group for assessing corruption risks at the University. The procedure for the activity and composition of the working group are approved by the head. Based on the results of the corruption risk assessment, a report is compiled, which is approved by the President of the University and signed by the Head of the working group.

**14.4.** The purpose of assessing corruption risks is to develop measures, plans, and programs aimed at minimizing and eliminating them.

**14.5.** Based on the results of the corruption risk assessment report, the

President takes the necessary measures to prevent, detect, and combat corruption in the activities of the University, including by amending existing anti-corruption standards and procedures.