

**THEMATIC COMPILATION OF RELEVANT INFORMATION SUBMITTED
BY POLAND**

ARTICLE 8, PARAGRAPH 4 UNCAC

REPORTING ON ACTS OF CORRUPTION

POLAND (THIRD MEETING)

(1) Measures applied to the Ministry of Justice:

The anti-corruption system in the Ministry of Justice works together with a Quality Management system into which procedures and measures relevant to the System of Counteracting Corruption Risks have been incorporated. In 2006, a procedure called *C.5.0.2 Rules of Conduct in the Event of Suspected Corruption Practices*, which applies to all Ministry of Justice employees, was developed and implemented. Based on this procedure, information concerning corruption is collected as follows:

The Ministry of Justice's home page presents information about the system of counteracting corruption risks in the Ministry of Justice. Persons who have information about corrupt behaviour on the part of a Ministry employee can post such information there. Information can be sent by e-mail to the following [address: antykorupcja@ms.gov.pl](mailto:antykorupcja@ms.gov.pl) or by regular mail to the address of: Ministerstwo Sprawiedliwosci (the Ministry of Justice), Al. Ujazdowskie 11, 00-950 Warszawa in an enveloped marked "Anti-corruption". Such information is collected by the Internal Auditor and the Head of the Complaints Unit and is handed over to the Director General. The Director General, upon acquainting himself with the notifications, decides which procedure to apply.

In the event that corrupt behaviour or the possibility of corrupt behaviour has been identified, corrective measures are carried out in a relevant area in accordance with the procedure of *implementation of corrective measures C.4.4*.

A procedure has been developed to analyse the risk of corruption for the purpose of identifying sensitive areas. Corruption risks are being monitored by repeatedly analysing risk at regular time intervals, depending on the level of the corruption risk, every 2, 3 or 5 years, coinciding with the performance of internal and external audits. The

Ministry of Justice, in consultation with an internal auditor, keeps a register of processes at risk of corruption. A list of job positions at risk of corruption is attached to the register.

In 2009, two training sessions were organised for the Ministry of Justice attended by 26 employees. In addition, the Ministry has prepared an "Anti-Corruption Manual" for its employees.

PART I

In response to tackle issues relating to the encouragement the members of the civil service to report acts or suspected acts of corruption we would like to draw the attention to the following handbooks published, amongst other things, by the Central Anti-Corruption Bureau in the course of the last two years:

- "The Anti-Corruption Handbook for Civil Servants"
- "The Anti-Corruption Handbook for Entrepreneurs"

These publications include information regarding acts of corruption, examples of corruption-related behaviours and their algorithms as well as advice directed at civil servants/ entrepreneurs exposed to corruption cases. Moreover, the publications point out contact opportunities with the Central Anti-Corruption Bureau and other institutions aimed at prevention and fighting against corruption with the intention of offering further consultation or chance to report suspected acts of corruption crime.

"The Anti-Corruption Handbook for Civil Servants" was conveyed to governmental and nongovernmental institutions and had the edition of about 12,000 copies.

"The Anti-Corruption Handbook for Entrepreneurs" was presented officially during the meeting with entrepreneurs. Furthermore, this publication deals with the issue of anti-corruption programmes implemented in companies, envisages exemplary forms of corruption-related behaviours as well as proposes approved reaction models to persons affected by corruption attempts. At present the publication has the edition of 3,000 copies.

Simultaneously, there are organized trainings for civil servants/entrepreneurs during which there are discussed topics presented in the above mentioned publications. These trainings have practical character and run as workshops. There have been organized 560 trainings for more than 13,000 civil servants and employees in 230 institutions until now.