

# TRAINING AND COMMUNICATION PROGRAMME FOR INTEGRITY

## **i3S, IBMC e IPATIMUP**

Decree-Law 109-E/2021 of 9 December created the National Anti-Corruption Mechanism (MENAC) and established the General Regime for the Prevention of Corruption (RGPC). This legal norm imposed an obligation on covered entities to adopt and implement a Regulatory Compliance Programme (PCN) that includes at least a risk prevention plan for corruption and related offences (PPR), a code of conduct, a whistleblowing channel and a training programme, with the aim of preventing, detecting and sanctioning acts of corruption and related offences carried out against or through the entity (see article 5 of the RGPC). Article 9 of the RGPC, under the heading Training and communication, states the following:

- 1 - The entities covered shall ensure that internal training programmes are carried out for all their managers and employees, so that they know and understand the policies and procedures implemented for the prevention of corruption and related offences.
- 2 - The content and frequency of training for managers and employees shall take into account the different exposure of managers and employees to identified risks.
- 3 - The hours of training provided for in paragraph 1 count as hours of continuous training that the employer must provide to the employee.
- 4 - The entities covered shall endeavour to make the policies and procedures referred to in paragraph 1 known to the entities with which they have dealings.'

It is within this framework that I3S, IPATIMUP and IBMC have designed a training and communication programme for integrity with the aim to promote an organisational culture of integrity, preventing and combating corruption, as well as encouraging ethical accountability and ensuring compliance with the RGPC.

This training and communication programme for integrity includes:

- Information and awareness-raising sessions with managers, coordinators and key members of each Organic Unit, aimed at disseminating knowledge about the importance of ethics and regulatory compliance in preserving an organisational culture that promotes good practices and a good working environment.

- Work/awareness-raising meetings with service managers and coordinators to promote a better understanding of the foundations and procedures needed to implement the PPR in their teams/units (annually and/or whenever necessary).
- Training, reflection or clarification activities for all employees to help them become involved in a culture of risk prevention; with special attention to certain functional areas, such as public procurement and purchasing, management of financial, human and material resources, access and information management (annually);
- Training sessions and workshops on corruption prevention.