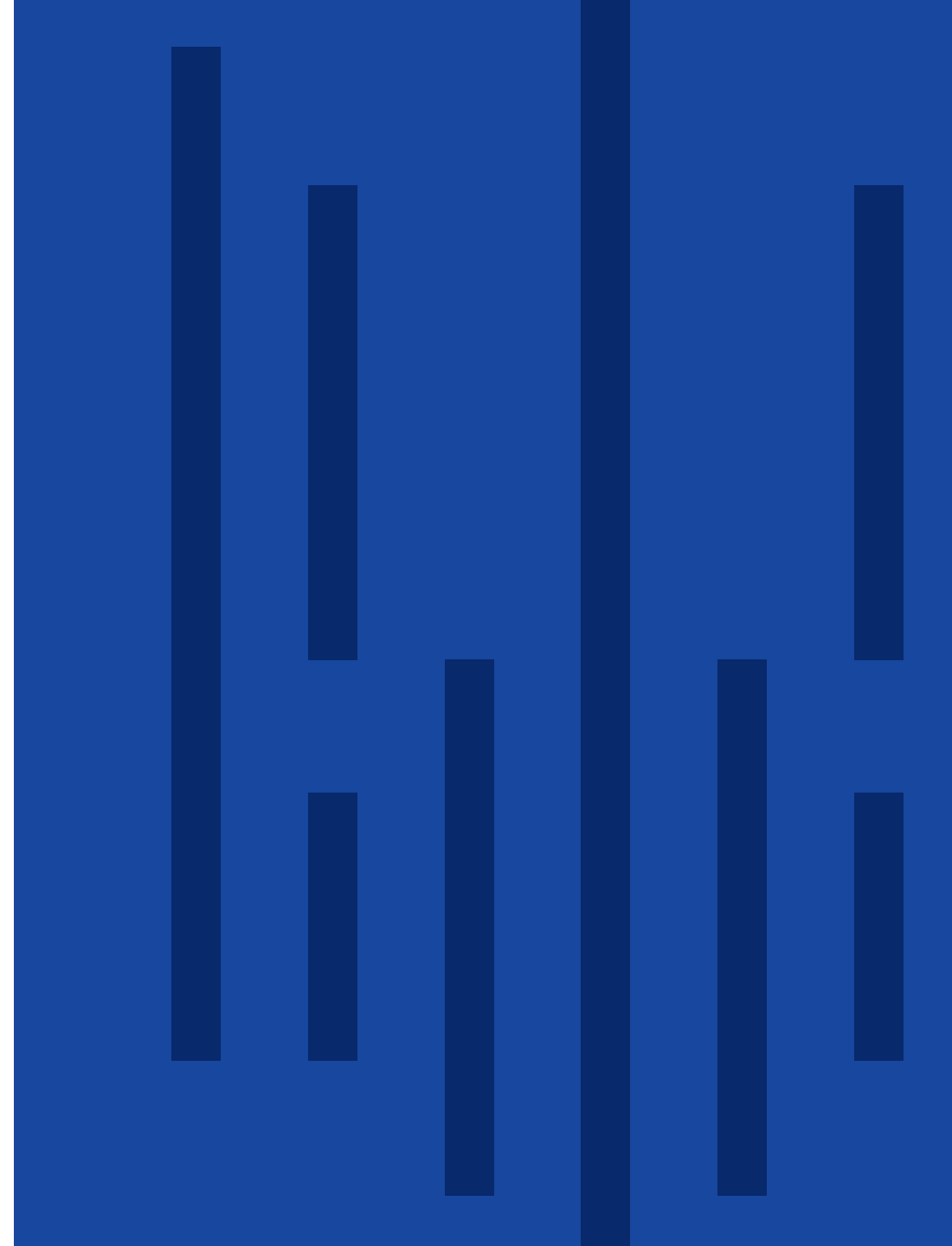


Control and verification of declarations: timeliness of filing, completeness, logical and arithmetic controls, automated verification, full verification

Yuliia Kulikova

Head of the Department of Full Verification of Declarations





Control for timeliness of filing declaration

- An authorised person (division) of the authority where the declarant works is obliged to verify the filing of declarations within 10 working days by searching for data in the publicly available Register of Declarations.
- The head of the authority where the declarant works is obliged to inform the NACP in case of failure to file or late filing of the declaration.
- The NACP verifies the information provided by the head of the authority.
- Failure to file a declaration is a criminal offence, and the NACP sends a reasoned conclusion to the prosecuting authority.
- Administrative liability is provided for late filing, depending on the position of the declarant, the NACP either draws up a protocol and sends it to the court or sends a reasoned conclusion to the National Police for drawing up a protocol.



Control for completeness of declaration

- ❑ Comparison of the amount and content of the information provided in the declaration with the information in registers and databases to identify false information in the declaration.

- ❑ The components of control are as follows:

Initial: These are carried out using the Register's software tools for all declarations;

Secondary: These are carried out through authorised persons in respect of declarations included in the list, which is formed according to the degree of completeness of the declared information.

Term - 40 working days, can be extended up to 20 working days.

- ❑ Based on the results obtained, an act is drawn up.

- ❑ Once the relevant facts have been established, the materials in question are forwarded to the relevant law enforcement agencies. Following this, an administrative offence report is drafted and submitted to the court.

Logical and arithmetic controls

All filed declarations for the reporting period are subject to risk assessment

LAC (logical and arithmetic controls) (4 steps):

1
Comparison of
declaration data
with data from
registers

2
Application of the
LAC "rules"

3
Determination of
risk weights

4
Determination of
the risk rating
indicator



Automatic verification

Step 1: yes/no

Determination of the declaration that can be verified automatically

- Applies to all filed declarations.
- Data is obtained from registers and databases to which the NACP has automated access.
- Inconsistencies between the data in the declaration and the registers and databases are searched.
- The amount of data in the declaration can be verified by comparing the data.



Step 2: Identification of inconsistencies

Automated verification of the declaration

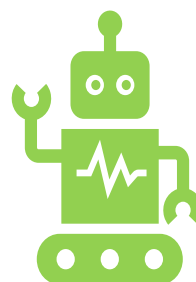
- Applies to selected declarations.
- Verification of information in the declaration with declarations for previous period.
- Comparison of information with state registers and databases and application of the “illicit enrichment formula”.
- A certificate will be issued based on the results of the automated verification process.

Automatic verification

The declaration pass the automated verification if:



- The declaration contains information that allows the identification of a family member of the declarant or the object of the declaration.
- There is no false information or discrepancy up to 100 SM*.
- No signs of a conflict of interest have been identified.
- There are no signs of unreasonable assets.
- No signs of illicit enrichment have been found.
- No evidence of inaccurate assessment has been identified.



The declaration does not pass the automated verification if:

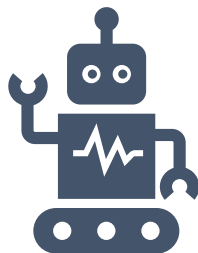


- The declaration contains information that does **NOT** allow the identification of a member of the declarant's family or the subject of the declaration.
- There are inconsistencies totalling more than 100 SM*.
- Indications of a conflict of interest have been identified.
- Signs of unreasonable assets have been identified.
- Signs of illicit enrichment have been identified.
- Inaccuracy of the valuation is established.

**subsistence minimums for able-bodied persons established as of the date of filing of the declaration*

Selection of declarations for full verification based on a risk-based approach

2021		2022		2023			
<u>I.</u>	<u>II.</u>	<u>III.</u>	<u>IV.</u>	<u>I.</u>	<u>II.</u>	<u>III.</u>	<u>IV.</u>
1	1	1	1	2	1	0	1
2	1	0	1	3	1	0	0



I. Declaration filed by a person holding a responsible or particularly responsible position (note to Art. 51-3 of the Law) or a position associated with a high or increased corruption risk (with the highest risk rating)

II. Declaration filed by other declarants (with the highest risk rating)

III. At the request of legal entities or individuals (signs of a criminal offence)

IV. At the request of legal entities or individuals (signs of an administrative offence)



Full verification of declarations (components):

- ❑ Verification of the accuracy of the declared information.
- ❑ Accuracy of the assessment of declared assets.
- ❑ Checking for conflicts of interest.
- ❑ Checking for signs of illicit enrichment or unreasonable assets.

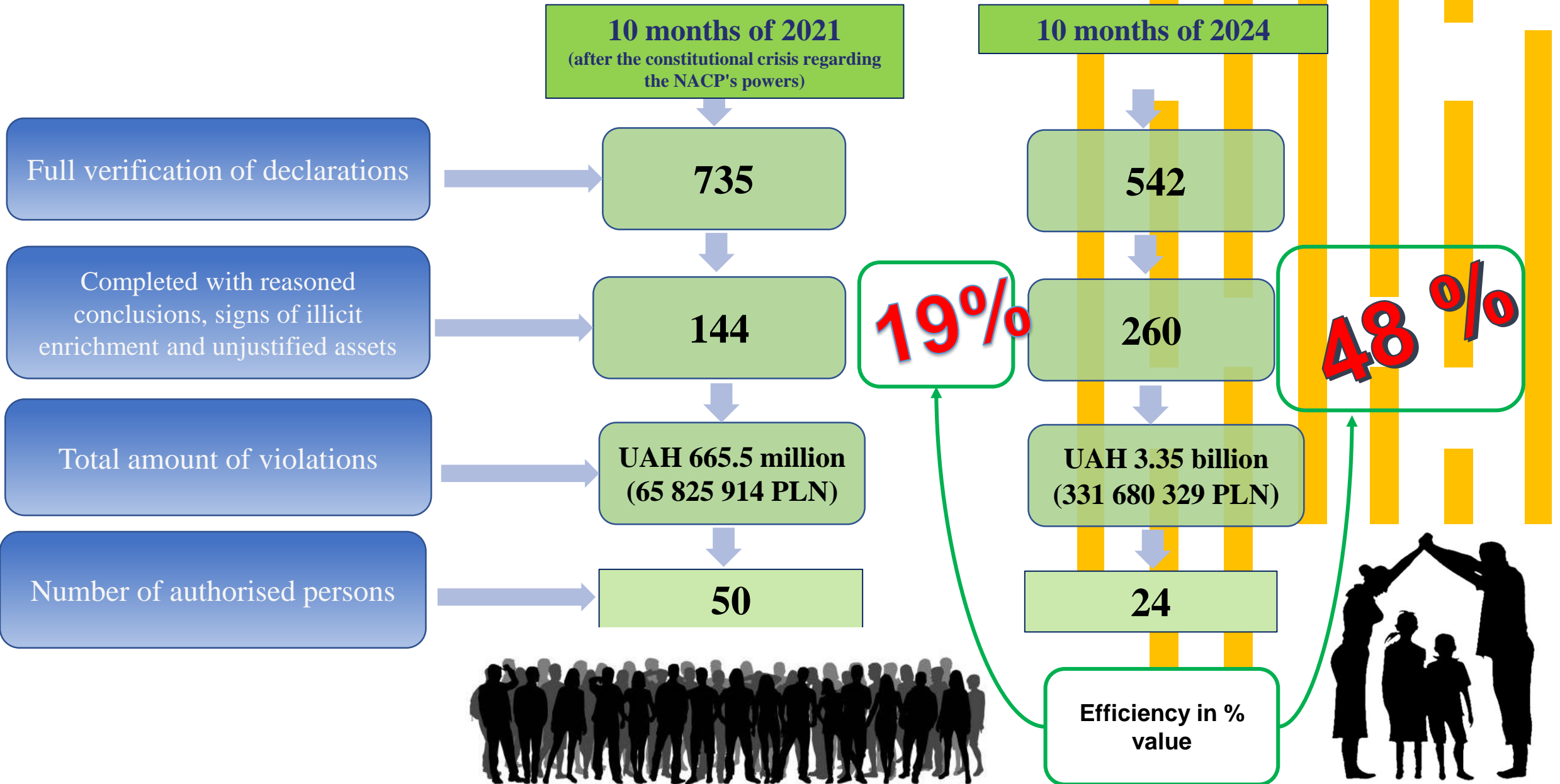
❖ *may be carried out during the period when the declarant is carrying out activities related to the performance of state or local government functions, as well as within three years after the termination of such activities.*



Full verification of declarations (procedure):

- Conducted by an authorised person of the NACP.
- Timeframe - 120 days, extension up to 180 days, may be repeated.
- Written requests are sent to public authorities, including foreign ones, legal entities and individuals, etc.
- Comparison of information in the declaration and registers, databases, evaluation of objects.
- A request for explanations is sent to the declarant and family members.
- A certificate is issued on the basis of the results.
- If there are grounds, the materials are sent to law enforcement agencies, a record of the administrative offence is drawn up and sent to the court.
- Materials on civil confiscation of unjustified assets are sent to the Specialised Anti-Corruption Prosecutor's Office.

Efficiency of the risk-based approach



Ex-ombudsman

In the 2022 declaration, the declarant provided false information about a loan from a third party in the amount of PLN 989,119.6 and failed to report income in the amount of PLN 237,388.7, which was used to repay the loan to the bank. In the 2023 declaration, the loan was increased to PLN 1,978,239.3 and there were indications of illicit enrichment in the amount of PLN 979,228.4 and the acquisition of monetary assets to repay the loan from unconfirmed sources. The investigation by the National Anti-Corruption Bureau of Ukraine (NABU) is ongoing.

Ambassador Extraordinary and Plenipotentiary of Ukraine to the State of Israel

The declarant provided false information about his cash assets in the amount of PLN 3,966,369. The NABU investigation is ongoing.

Head of the Regional Service Centre of the Main Service Centre of the Ministry of Internal Affairs in Mykolaiv Oblast

The declarant didn't confirm the date of acquisition, quantity and value of his asset: cryptocurrency worth PLN 9,980,217.6. The investigation by the State Bureau of Investigation (SBI) is ongoing.

Deputy Head of the Legal Support Department of the Main Office of the State Tax Service in Volyn oblast

The SBI filed criminal proceedings with the court for not declaring the house in which the declarant lives with his family and for not indicating the value of cars worth PLN 286,844.7.

Head of the Ochakiv City Council, Mykolaiv Oblast

The declarant provided false information about the amount of his cash in the amount of PLN 573,689.4. Signs of illicit enrichment in the amount of PLN 1,186,943.6 and a gift in cash from his mother worth more than PLN 890,207.7, which exceeded his legitimate income, were found. The National Police investigation is ongoing.



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PREVENTION

Thank you for your attention!