

APPROVED

by order of the Director of Klaipėdos valstybinė
kolegija / Higher Education Institution
No. V1-96, dated September 3, 2025

PROCEDURES FOR THE SUBMISSION AND INVESTIGATION OF REPORTS OF VIOLATIONS AT KLAIPĖDOS VALSTYBINĖ KOLEGIJA / HIGHER EDUCATION INSTITUTION

SECTION I GENERAL PROVISION

1. The Procedure for Submitting and Investigating Reports of Violations at Klaipėdos valstybinė kolegija / Higher Education Institution (hereinafter referred to as the “Procedure”) establishes the process for receiving reports regarding potential, ongoing, or past violations at Klaipėdos valstybinė kolegija / Higher Education Institution (hereinafter referred to as the “KVK/HEI”), the procedure for receiving reports through the internal reporting channel operating at the College, and the procedure for evaluating the information regarding the violation contained therein and making a decision.

2. The grounds for reporting violations and the circumstances under which information about violations may be reported are set forth in the Law on the Protection of Whistleblowers of the Republic of Lithuania, the Law on the Prevention of Corruption of the Republic of Lithuania, the Policy on Creating an Anti-Corruption Environment at KVK/HEI, and the Anti-Corruption Rules of Conduct for Employees of KVK/HEI.

3. Terms used in this description:

3.1. **A person reporting a violation** – a person who provides information about a violation at the KVK/HEI with which they have or had an employment relationship or a contractual relationship (consulting, contracting, internship, apprenticeship, volunteering, etc.).

3.2. **Competent authority** – a person appointed by the Director of the KVK/HEI who manages the internal whistleblowing channel, reviews report of violations received through it, and ensures the confidentiality of the person who reported the violation;

3.3. **Violation** – a criminal offense, administrative offense, or breach of employment duties, or any other act that poses a threat to the public interest, may be being committed or has been committed at the KVK/HEI committing, or having committed a criminal offense, an administrative offense, a breach of employment duties, or any other violation of the law that poses a threat to or infringes upon the public interest, of which the whistleblower becomes aware through their existing or prospective employment or contractual relationship with this institution.

3.4. **Report** – Information regarding the violation is submitted to the KVK/HEI in accordance with the procedure and format set forth in these Regulations;

3.5. Other terms used in this Description correspond to the terms used in the Whistleblower Protection Act and other legislation.

SECTION II REPORTING AND RECORDING OF VIOLATIONS

4. Any person who has or has had an employment or contractual relationship with the KVK/HEI (such as through studies, a project, an internship, an apprenticeship, volunteer work, consulting, services, a contract, etc.) may report a violation through the internal reporting channel.

5. Information regarding violations must be submitted in writing. The person reporting the violation must complete the form established by the Government of the Republic of Lithuania (Annex 1).

If the person reporting the violation does not comply with the requirement to use the standard report form and instead submits a report in free form, the report must include the following:

- who committed, is committing, or is preparing to commit the violation, when, and in what manner;
- the date and circumstances of learning about the violation;
- their first name, last name, personal identification number, place of employment, and other contact information;
- provide data, photographs, or other types of information revealing signs of a possible violation.

6. A person reporting a violation may do so by completing a standard form or a free-form report in one of the following ways:

6.1. in person, at the agreed time, to the competent authority at the following address: Jaunystės St. 1, Klaipėda, Room 119. Tel. +370 (612) 94025.

6.2. send the information to the KVK/HEI email address: korupcijosprevencija@kvk.lt.

6.3. fill out the online form on the KVK website, under the "Corruption Prevention" section.

7. The competent authority records the received notification in the KVK/HEI document management system.

SECTION III

ASSESSMENT, INVESTIGATION, AND DECISION-MAKING REGARDING THE INFORMATION ON THE VIOLATION CONTAINED IN THE REPORT

8. The competent authority shall assess the notification, if necessary after consulting the notification review group (commission), and shall take one of the following decisions:

8.1. if the information received gives reason to believe that a violation is being prepared, is being committed, or has been committed, and the KVK/HEI is not authorized to investigate it, the competent authority shall, without delay but no later than within 2 business days of receiving the information, forward the information received regarding possible violations to the competent authority authorized to investigate such matters without the whistleblower's consent and notify the whistleblower of this in writing.

8.2. if the information received gives reason to believe that a violation is being prepared, committed, or has been committed, and the investigation of which falls under the jurisdiction of the KVK/HEI, the competent authority shall, without delay, but no later than within 2 business days of receiving the report, immediately begin an investigation or forward the report and all related information to a commission established by the KVK/HEI to investigate acts of the relevant type.

8.3. if it is evident that the report is based on information that does not correspond to reality, or if the information is abstract, based on general statements or personal opinions of the person who submitted it that cannot be verified, the information in the report is not investigated, and the person who reported the violation may be asked to clarify the content of the report.

8.4. if it becomes apparent that the person who filed the report is submitting a repeat complaint regarding the same violations without providing any additional details, after the previously submitted report has been investigated and a decision has been made regarding it, the competent authority has the right to decide to discontinue the investigation of the received report.

9. Information regarding a violation received by the KVK/HEI at an email address other than the one specified in subsection 6.2 of the Procedure shall not be registered and shall be immediately forwarded to the email address specified in subsection 6.2 of the Procedure, and the information regarding the violation must be deleted immediately.

10. The competent authority shall ensure that the information received regarding the violation and the related data are stored securely and are accessible only to authorized persons who are investigating the violation.

11. KVK/HEI employees who, in accordance with their functions, have access to the personal data of a person reporting a violation, the data provided, or who may learn the personal data of the

person who provided it, are informed of their liability for violating the whistleblower protection requirements established by the Law and/or other legal acts and must sign a confidentiality agreement (Annex 2) and undertake not to disclose such information or data to third parties.

12. Once the competent authority has completed its review of the information provided in the report, it shall, without delay and no later than 5 business days from the date of the decision, notify the person who reported the violation in writing of the decision reached, the results of the review, and the actions that have been or are planned to be taken.

SECTION IV FINAL PROVISIONS

15. It is prohibited to take any adverse action against a person who has reported a violation, based on such a report, from the date the report was submitted: dismiss them from work or service, demote them to a lower position or transfer them to another workplace, intimidate, harass, discriminate against, threaten retaliation, limit career opportunities, reduce their salary, change their work schedule, or cast doubt on their competence, disclose negative information about him to third parties, revoke his right to handle information constituting a state or official secret, or take any other measures that would have a negative impact.

16. Persons who violate the provisions of these Regulations shall be held liable in accordance with the procedures established by law.

17. The description may be amended or repealed by order of the Director of the KVK/HEI.

Procedures for the Submission and Investigation
of Reports of Violations at Klaipėdos valstybinė
kolegija / Higher Education Institution
Annex 1

(Violation Report Form)

NOTIFICATION OF A VIOLATION

20 ____ m. _____ d.

(place)

Information about the person reporting the violation:	
Name, surname	
Workplace (employment, work, or contractual relationships currently or previously associated with the institution)	
Position	
Phone number (contact information)	
Personal email address or home address	
Information about the violation:	
1. What type of violation are you reporting? What is the type of violation?	
2. Who committed this violation? What might have been the person's motives for committing the violation?	
3. Place and time of the violation.	
Information about the person or persons who committed the violation:	
Name, surname	
Workplace	
Position	
4. Were there any other individuals who participated in or could have participated in the violation? If so, please identify them.	
5. Are there any other witnesses to the violation? If so, please provide their contact information.	
Information about the witness or witnesses to the violation:	
Name, surname	
Position	
Workplace	
Phone number	

Email	
6. When did the violation occur, and when did you learn about it or notice it?	
7. What evidence supporting the violation could you provide that might assist in the investigation? Please list any written or other evidence regarding the violation that you are submitting.	
8. Have you already reported this violation to anyone? If so, to whom did you report it, and did you receive a response? If you received a response, please summarize it.	
9. Additional notes and comments.	

☐ I confirm that I am aware of the legal consequences of providing false information, and that the information I am providing is accurate.

If my report is not deemed to comply with the requirements of the Law on the Protection of Whistleblowers of the Republic of Lithuania, I agree that it should be examined in accordance with the general provisions of the law, without applying whistleblower protection to me (select one):

- ☐ Yes
☐ No

Date	Signature
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KLAIPĖDOS VALSTYBINĖ KOLEGIJA / HIGHER EDUCATION INSTITUTION

(person's name and surname)

(position)

CONFIDENTIALITY COMMITMENT

20 ____ yr. _____ d.

Klaipėda

1. understand that, in the course of my duties at Klaipėdos valstybinė kolegija / Higher Education Institution (hereinafter referred to as the “KVK/HEI”), I will have access to information about individuals who, pursuant to the provisions of the Law on the Protection of Whistleblowers of the Republic of Lithuania (hereinafter referred to as the “Whistleblower Protection Law”), are subject to confidentiality requirements. This information may be disclosed or transferred only to authorized persons or institutions in cases specified by the laws of the Republic of Lithuania.

2. I understand that confidential information includes the personal data of a person who has reported a violation in accordance with the procedures set forth in the Whistleblower Protection Act, as well as any other information that could directly or indirectly identify that person.

3. I promise to ensure confidentiality and not to disclose, or transmit any information which, pursuant to the Law on the Protection of Whistleblowers and the Procedure for the Establishment and Operation of Internal Channels for Reporting Violations, approved by Resolution No. 1133 of the Government of the Republic of Lithuania on November 14, 2018 “On the Implementation of the Law on the Protection of Whistleblowers of the Republic of Lithuania,” the requirement to ensure confidentiality applies to any person who is not authorized to access this information, both within and outside the KVK/HEI. I also undertake to report to the person responsible for creating an anti-corruption environment any situation I observe or become aware of that may threaten the security and confidentiality of such information.

4. I understand that this commitment will remain in effect for the duration of my employment at the KVK/HEI, as well as after I move to another position or upon the termination of my employment or contractual relationship.

5. I am familiar with the requirements for whistleblower protection set forth in the Whistleblower Protection Act and other relevant laws and regulations.

6. I have been warned that, if I breach this undertaking, I may be held liable for violating the whistleblower protection requirements set forth in the Whistleblower Protection Act and/or other applicable laws.

(signature)

(name and surname)