



**ORDER OF THE RECTOR OF VILNIUS
UNIVERSITY**

**ON THE APPROVAL OF THE VILNIUS UNIVERSITY ACTION PLAN FOR THE
PREVENTION OF CORRUPTION FOR 2022–2023**

Under Article 43(1)(42) of the Statute of Vilnius University, Article 7(6) of the Republic of Lithuania Law on Prevention of Corruption, and taking into account the National Anti-Corruption Programme of the Republic of Lithuania for 2015–2025, approved by Resolution of the Seimas of the Republic of Lithuania No. XII-1537 of 10 March 2015 “On the Approval of the National Anti-Corruption Programme of the Republic of Lithuania for 2015–2025”, and the Vilnius University Strategic Plan for 2021–2025, approved by Resolution of the Council of Vilnius University No. TPN-3 of 24 February 2021 “On the Approval of the Vilnius University Strategic Plan for 2021–2025”:

1. I hereby a p p r o v e the following Vilnius University Action Plan for the Prevention of Corruption for 2022–2023 (hereinafter the ‘Plan’).
2. I hereby d e l e g a t e the control of the implementation of the Plan to the Chancellor of Vilnius University.

APPROVED
by Order No. R-184 of 31 May 2022
of the Rector of Vilnius University

THE VILNIUS UNIVERSITY ACTION PLAN FOR THE PREVENTION OF CORRUPTION FOR 2022–2023

CHAPTER I GENERAL PROVISIONS

1. The Vilnius University Action Plan for the Prevention of Corruption for 2022–2023 (hereinafter the ‘Plan’) has been prepared under the Republic of Lithuania Law on Prevention of Corruption, the National Anti-Corruption Programme of the Republic of Lithuania for 2015–2025, approved by Resolution of the Seimas of the Republic of Lithuania No. XII-1537 of 10 March 2015 “On the Approval of the National Anti-Corruption Programme of the Republic of Lithuania for 2015–2025” (hereinafter the ‘National Anti-Corruption Programme’), Order of the Director of the Special Investigation Service of the Republic of Lithuania No. 2-246 of 30 November 2021 “On the Approval of Recommendations on the Determination of the Probability of Manifestation of Corruption and Its Procedure”, the Statute of Vilnius University (hereinafter the ‘Statute’), and taking into account the Vilnius University Strategic Plan for 2021–2025, approved by Resolution of the Council of Vilnius University No. TPN-3 of 24 February 2021 “On the Approval of the Vilnius University Strategic Plan for 2021–2025” (hereinafter the ‘Vilnius University Strategic Plan’), and the Description of the Procedure for the Evaluation of the Action Plans for the Prevention of Corruption, Their Drafts, and Their Implementation, approved by Order of the Director of the Special Investigation Service of the Republic of Lithuania No. 2-283 of 28 December 2021 “On the Approval of the Description of the Procedure for the Evaluation of the Action Plans for the Prevention of Corruption, Their Drafts, and Their Implementation”.

2. The purpose of the Plan is to ensure a long-term, targeted, and effective system of prevention and control of corruption; create a culture of transparency in the activities of Vilnius University; organise the measures of the Plan by constantly reviewing the progress and efficiency of its implementation.

3. The terms used in the Plan shall be understood as they are defined in the Republic of Lithuania Law on Prevention of Corruption and the National Anti-Corruption Programme.

CHAPTER II ANALYSIS OF CORRUPTION RISK FACTORS

4. Under Order of the Rector of Vilnius University No. R-193 of 17 May 2017 “On the Approval of the Vilnius University Programme for the Prevention of Corruption for 2017–2018 and the Plan of Measures for Its Implementation for 2017–2018”, the Vilnius University Corruption Prevention Programme for 2017–2018 (hereinafter the ‘Programme’) has been approved. In terms of anti-corruption, the areas of research and studies have been improved in the implementation of the programme.

5. During the implementation of the Programme:

5.1 Order of the Rector of Vilnius University No. R-175 of 8 May 2017 “On the Approval of the Description of the Procedure for Accounting for Lecturers of Vilnius University Working Time” has been adopted;

5.2 Resolution of the Senate of Vilnius University No. S-2017-6-2 of 23 May 2017 “On the Approval of the Recast of the Description of the Procedure for Payment, Reimbursement, and Recovery of Tuition Fees at Vilnius University” has been adopted;

5.3 Order of the Pro-Rector for Studies of Vilnius University No. R-445 of 11 October 2017 “On the Amendment to the Vilnius University Scholarship Regulations” has been adopted;

5.4 Order of the Rector of Vilnius University No. R-582 of 29 October 2018 “On the Approval of the Description of the Procedure for Secondments of Vilnius University Employees and the Amendment to Order of the Rector of Vilnius University No. R-348 of 14 July 2014 “On the Approval of the Description of the Procedure for Filling in the Time Sheet and its Form”” has been adopted;

- 5.5 Order of the Pro-Rector for Studies of Vilnius University No. R-7 of 7 January 2019 “On the Amendment to the Vilnius University Scholarship Regulations” has been adopted;
- 5.6 an internal reporting channel intended for employees wishing to provide information on possible manifestations of corruption has been created;
6. in 2019–2021, the areas of public procurement, human resources, and project management at Vilnius University have been improved in terms of anti-corruption. To strengthen internal control:
- 6.1 Order of the Rector of Vilnius University No. R-601 of 21 November 2019 “On the Amendment to Order of the Rector of Vilnius University No. R-582 of 29 October 2018 “On the Approval of the Description of the Procedure for Secondments of Vilnius University Employees” and the Amendment to Order of the Rector of Vilnius University No. R-348 of 14 July 2014 “On the Approval of the Description of the Procedure for Filling in the Time Sheet and its Form”” has been adopted;
- 6.2 Order of the Rector of Vilnius University No. R-39 of 24 January 2020 “On the Amendment to Order of the Rector of Vilnius University No. R-495 of 13 November 2017 “On the Approval of the Description of the Procedure for the Adjustment and Control of Public and Private Interests at Vilnius University and the List of Positions Holders Thereof Are Obligated to Declare Private Interests”” has been adopted;
- 6.3 Order of the Rector of Vilnius University No. R-424 of 9 December 2021 “On the Amendment to Order of the Rector of Vilnius University No. R-5 of 2 January 2018 “On the Approval of the Description of the Procedure for the Organisation and Implementation of Public Procurement at Vilnius University”” has been adopted;
- 6.4 analysis of public procurement claims is implemented periodically;
- 6.5 internal audits of completed projects are performed.
7. In implementing anti-corruption education and increasing employee awareness, within the scope of activity 3.2.7 ‘Creation of a Unified Corruption and Prevention Control System’ of project No. 09.3.1-ESFA-V-738-03-0001 “Optimisation of the Network of Higher Education Institutions and Improvement of the Quality of Studies by Integrating Šiauliai University into Vilnius University”:
- 7.1 e-training on Transparency Promotion and Corruption Prevention intended for all employees of Vilnius University have been prepared;
- 7.2 anti-corruption training was organised for specialists of human resources, property management, public procurement, and project management of Vilnius University.
8. In accordance with the data of the ‘Map of Corruption in Lithuania’ study for 2021, 27 per cent of new employees are recruited to public sector institutions through connections. A survey of 964 employees of Vilnius University was conducted in 2021. Employees of Vilnius University were invited to express their opinion by responding to an open-ended question about the things that they would like to see changed concerning all issues relevant to employees of Vilnius University. 657 employees submitted their suggestions, 56 responses (8.5 per cent) of which were related with anti-corruption. The analysis of the survey and suggestions of employees identified the following corruption risk factors: academic employees emphasised the complexity of the conditions and process of certification and competitions; non-academic employees – the complexity of remuneration procedures; both academic and non-academic employees – manifestations of nepotism and cronyism, and delays in decision-making regarding recruitment.
9. The Interinstitutional Action Plan for 2020–2022 for the Implementation of the National Anti-Corruption Programme of the Republic of Lithuania, approved by Resolution of the Government of the Republic of Lithuania No. 1232 of 4 November 2020 “On the Approval of the Interinstitutional Action Plan for 2020–2022 for the Implementation of the National Anti-Corruption Programme of the Republic of Lithuania for 2015–2025”, provides for consistent and effective improvement of the corruption prevention and control system, anti-corruption education and awareness, ensuring the continuity of prevention and control measures – to make a positive impact on areas of public life and increase transparency in the country. The National Anti-Corruption Programme of the Republic of Lithuania indicates that there is a lack of transparency and publicity in terms of property management, use, and disposal.
10. The analysis presented in the Prevention of Corruption Programme for 2020–2023 of the Ministry of Education, Science and Sport of the Republic of Lithuania, approved by Order of the Minister of Education, Science and Sport of the Republic of Lithuania No. V-802 of 28 May 2020 “On the Approval of the Prevention of Corruption Programme for 2020–2023 of the Ministry

of Education, Science and Sport of the Republic of Lithuania” focuses on the improvement of the control system related with public procurement, management of private and public interest risks, and anti-corruption evaluation of regulating legal acts and their drafts.

CHAPTER III OBJECTIVE, TASKS, AND EVALUATION OF CRITERIA OF THE PLAN

11. The objectives, tasks, and evaluation criteria of the Plan were prepared in accordance with the conclusions of the analysis of corruption risk factors listed in Chapter II of the Plan. The Plan provides for objectives and tasks dedicated to mitigating corruption risks.

12. In accordance with the Vilnius University Strategic Plan and the listed conclusions of the analysis of corruption risk factors, the Plan is oriented towards the elimination of corruption risk factors and strengthening of integrity and community’s resilience to corruption in the areas of property management and human resources of Vilnius University.

13. One of the tasks of the National Anti-Corruption Programme is the development of anti-corruption education. To contribute to the implementation of this task, the plan is to focus on anti-corruption education of employees and students of Vilnius University, organising a competition of student papers to promote transparency research, prepare transparency training for students, and include transparency training into the integration process of new employees.

14. In implementing the regulations of the Republic of Lithuania Law on Prevention of Corruption, a systematic revision of internal legal acts is required. The legal acts of Vilnius University regulating the selection of employees and management of property will be revised in terms of anti-corruption.

15. Objectives of the Plan:

15.1 ensuring the efficiency of the corruption prevention system by improving the legal environment;

15.2 promoting community’s intolerance for corruption-related infringements of the law.

16. Tasks to achieve the objective specified in Item 15(1) of the Plan:

16.1 to determine the level of resilience to corruption;

16.2 to form the environment of the corruption prevention control in the areas of human resources and property management;

16.3 to improve the legal regulation of the area of corruption prevention of Vilnius University;

16.4 to develop an internal reporting channel for providing information on breaches.

17. Tasks to achieve the objective specified in Item 15(2) of the Plan:

17.1 to increase the involvement of community into the activities of the Plan and foster intolerance for corruption;

17.2 to inform the community about the activities of corruption prevention performed at Vilnius University, make the procedures and outcomes of these activities public;

17.3 to implement the anti-corruption education of Vilnius University community.

18. The implementation of the objectives of the Plan is evaluated according to the criteria of corruption risk mitigation measures provided for in the Plan.

CHAPTER IV IMPLEMENTATION AND CONTROL OF THE PLAN

19. Corruption risk mitigation measures (Annex), executors responsible for implementing the measures, implementation deadlines, and implementation evaluation criteria are provided for the implementation of tasks listed in Items 16–17 of the Plan.

20. The implementation of measures provided for in the Plan is:

20.1 coordinated by an employee responsible for the prevention of corruption at Vilnius University (hereinafter the ‘Corruption Prevention Officer’);

20.2 controlled by the Chancellor of Vilnius University.

21. Executors listed in the Annex on the Corruption Risk Mitigation Measures shall:

21.1 implement the measures,

21.2 notify responsible subjects listed in Item 20 of this Plan about deviation from the

deadlines indicated in the Annex, prepare and submit reports on the implementation of these measures for the subjects indicated in Item 20 of this Plan.

22. The Corruption Prevention Officer evaluates the provided information about the progress and efficiency of the implementation of the Plan and, if required, takes measures to eliminate the detected obstacles and issues due to which the objectives and tasks of the Plan may not be reached and the measures may not be implemented on time.

23. The summarised information on the progress and efficiency of the implementation of the Plan is provided for the Rector of Vilnius University at the end of financial calendar year.

24. Information about the progress of the implementation of the Plan is publicly available on Vilnius University's website in the section 'Korupcijos prevencija' (in Lithuanian).

25. All members of the community may submit their suggestions (via the reporting channel or other ways) for the implementation and improvement of regulations of the Plan. At least once a year suggestions for supplementing and updating the Plan are analysed. The Corruption Prevention Officer initiates the discussion on supplementation of the Plan and suggestions.

26. The Plan is implemented from the funds of Vilnius University as well as from other funds received legitimately and for intended use.

CORRUPTION RISK MITIGATION MEASURES

No.	Tasks	Measures	Executors	Deadline	Implementation evaluation criteria
First objective: ensuring the efficiency of the corruption prevention system by improving the legal environment					
1.	To determine the level of resilience to corruption	Determining the level of resilience to corruption in accordance with regulating legal acts of the Republic of Lithuania and a survey of employees who must declare their private interests ⁱ .	The Corruption Prevention Officer (hereinafter the ‘CPC’), Strategic Planning Division of the Central Administration of Vilnius University (hereinafter the ‘University’).	2022 Quarter IV	The level of resilience to corruption was determined.
2.	To form the environment of the corruption prevention control in the areas of activities listed in the Plan	Anti-corruption evaluation of legal acts in the areas of human resources and property management.	CPC, Human Resources Division of the Central Administration of the University,	2022 Quarter III	Anti-corruption evaluation of legal acts in the areas of human resources and property management was performed.
		Preparation of draft amendments according to the conclusions of anti-corruption evaluation of the University’s legal acts in the areas of human resources and property management.	Property Management and Service Centre of the University.	2022– 2023	Amendments to evaluated legal acts made according to the anti-corruption evaluation of legal acts.
3.	To improve the legal regulation of the area of corruption prevention of the University	Preparation of and/or amendment to legal acts of the University in the area of prevention of corruption.	CPC, Legislative Division of the University’s Central Administration.	2022– 2023	Mandatory legal acts of the University in the area of prevention of corruption were prepared or updated.

4.	To develop an internal reporting channel for providing information on breaches	Preparation and implementation of the procedure for providing information on breaches at the University by implementing the Law on the Protection of Whistleblowers.	CPC, University's Information Technology Service Center.	2022 Quarter IV	The procedure for providing information about breaches at the University was prepared and published.
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Second objective: promoting community's intolerance for corruption-related infringements of the law					
5.	To increase the involvement of the University community into the activities of the Plan and foster intolerance for corruption	Competition of students' research papers and celebration of the International Anti-Corruption Day.	CPC, Šiauliai Academy of the University.	2022–2023	Events on the agenda have been implemented.
6.	To inform the University community about the implemented measures for corruption risk mitigation and their outcomes	Publishing of implementation of the measures for corruption risk mitigation on the Internet and Intranet sites of the University.	CPC, Community Development Division of the Central Administration of the University.	At least once a year	Measures for corruption risk mitigation and performance results that should be made public were introduced to the Rector of the University and published on the Internet and Intranet sites of the University.
7.	To implement the anti-corruption education of the University community	Introductory e-training for new employees.	CPC, Human Resources Division of the Central Administration of the University, Information Technology Service Center.	Constantly	Transparency training has been included into the integration process of new employees.

ⁱ According to Order of the Rector of Vilnius University No. R-495 of 13 November 2017 “On the Approval of the Description of the Procedure for the Adjustment and Control of Public and Private Interests at Vilnius University and the List of Positions Holders Thereof Are Obligated to Declare Private Interests”

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