APPROVED BY

Order No. V13-9, dated 11th of April, 2013, of director of UAB “Nefrida” (Ltd.)

**Please inform about illegal actions of employees of the clinic UAB “Nefrida” (Ltd.) by phone (8-46)** **397 069 or e-mail klinika@nefrida.lt . We guarantee your anonymity.**

PLEASE NOTE that the laws of the Republic of Lithuania prohibit slander and false accusation of another person for committing a crime. These actions are subject to criminal liability.

**Corruption Prevention Programme**

**I. GENERAL PROVISIONS**

1. The purpose of the Corruption Prevention Programme (hereinafter referred to as Programme) of the clinic UAB “Nefrida” (Ltd.) (hereinafter referred to as Clinic) is to ensure a long-term, efficient and targeted corruption prevention and control at the Clinic.

2. The Programme is prepared, following the National Anticorruption Programme, approved by Resolution No. IX-711 , dated 17th of January, 2002, of Seimas of the Republic of Lithuania (Official Gazette, 2002, No. 10-355, No. 60-2346), the Law on Prevention of Corruption of the Republic of Lithuania (Official Gazette, 2002, No. 57-2297), the Law on Public Administration of the Republic of Lithuania (Official Gazette, 1999, No. 60-1945; 2006, No. 77-2973), the Law on the Adjustment of Public and Private Interests in the Civil Service of the Republic of Lithuania (Official Gazette, 1997, No. 67-1659; 2000, No. 18-431), Resolution No. 1484, dated 19th of September, 2002, of the Government of the Republic of Lithuania “Regarding approval of procedure for presentation of information about person, intending to hold or holding the position in the state or municipality institution” (Official Gazette, 2002, No. 93-3998), Resolution No. 1601, dated 8th of October, 2002, of the Government of the Republic of Lithuania “Regarding approval of procedure for corruption risk analysis” (Official Gazette, 2002, No. 98-4339), Resolution No. 276, dated 26th of February, 2003, of the Government of the Republic of Lithuania “Regarding approval and implementation of the methodology for impact assessment of the draft decisions” (Official Gazette, 2003, No. 23-975), Resolution No. 607, dated 19th of May, 2004, of the Government of the Republic of Lithuania “Regarding approval of rules for activity and cooperation of the divisions and persons, implementing corruption prevention and control in the state and municipality institutions” (Official Gazette, 2004, No. 83-3015), Criminal Code of the Republic of Lithuania (Official Gazette, 2000, No. 89-2741), Order No. 164, dated 24th of October, 2003, of director of the Special Investigation Service “Regarding approval of methodology for identification of the corruption manifestation probability” (Official Gazette, 2003, No. 103-4622).

3. The following definitions are used in the Programme:

**Corruption** – any behavior of a public servant or equivalent person, which does not comply with the given powers or established standards of conduct, or promotion of this behavior, seeking to benefit himself or other persons, thus, adversely affecting the interests or persons and the state.

**Corruption-related offences** – corruption-related criminal acts and violations of legislation, identical in nature, but less serious, which are subject to administrative, disciplinary or other legal liability.

**Corruption-related criminal acts** – acceptance of a bribe, trade in influence, subornation, other criminal acts committed in the public sector or by providing public services with a view of seeking  personal gain or gain for other persons: abuse of office or misuse of powers, abuse of authority, forgery of documents and measuring devices, fraud, appropriation or embezzlement, disclosure of an official secret or a commercial secret, incorrect income, profit or assets statements, money or asset laundering, interfering with activities of a civil servant or a person carrying out public administration functions as well as other criminal acts aimed at seeking or soliciting a bribe or subornation, or concealing or disguise acceptance or giving of a bribe or subornation.

4. The definitions, used in the Programme, comply with the definitions, used in the Law on Prevention of Corruption and other legal acts of the Republic of Lithuania.

5. The Programme shall be implemented, following the plan of the Programme implementation measures (hereinafter referred to as the Plan of Measures), enclosed in appendix hereto.

**II. ACTIVITY FIELDS OF THE HEALTH CARE SYSTEM, WHERE CORRUPTION MANIFESTATION IS POSSIBLE**

6. The fields of the Clinic’s activity, where corruption manifestation is possible, can be identified. The data about the activity fields of the Clinic are given in Table 1.

Table 1

**No.**

**Activity fields of the Clinic, where corruption is possible**

**Employees of the Clinic, for whom corruption is possible**

Prescription of compensated medicine and medical aids

1.

Family doctors, pediatricians, specialist doctors of the Clinic.

Illegal payments, when providing fee-paying health care services and the health care services, paid from the mandatory health insurance fund budget for the patients

2.

Family doctors, pediatricians, specialist doctors of the Clinic.

Illegal payments, when providing fee-paying social services

3.

Social worker

Activity, related with issue of sick leaves and other certificates

4.

Family doctors, pediatricians

**III. AIMS AND OBJECTIVES OF THE PROGRAMME**

7. The aim of the Programme – to clarify and eliminate the premises of corruption at the Clinic, to ensure more transparent and effective functioning of the Clinic and performance of its employees.

8. The objective of the Programme – to disclose and eliminate potential causes of corruption, while implementing the plan of measures for implementation of the Corruption Prevention Programme, in order to ensure that all funds, allocated for the Clinic, would be used according to their purpose and for provision of rationally high-quality health care services, for ensuring the patients’ rights and freedoms, as well as the impact on the employees of the health care system, seeking to discourage them from the possible corruptive criminal acts.

9. The following is anticipated to reach the aim and objective of corruption prevention:

9.1. to carry out a continuous and targeted corruption prevention programme, to ensure effective implementation of the measures, provided in long-term corruption prevention system;

9.2. to identify the activity areas in the Clinic, where corruption acts are possible, and conditions for its emergence and spread, to make proposals for improvement of the existing legal acts;

9.3. to implement the principle of inevitable liability for unlawful acts;

9.4. to promote intolerance for manifestation of corruption and to integrate corruption prevention into society;

9.5.to associate the measures, provided for in the Programme, with solution of the social problems and protection of society from the existing and emerging corruption conditions in the health system; to protect the universally recognized patient’s rights and freedoms, the rights and freedoms of the Clinic’s employees, not to violate the presumption of innocence;

10. The Clinic should publish the Corruption Prevention Programme and the plan for its implementation measures on its website.

11. Information about whom a patient should contact in case of a corruptive act should be published on all information publication places of the Clinic.

12. The Clinic shall immediately make all identified cases of corruption public.

13. To consider complaints, statements about the possible cases of corruption and to assess proposals, regarding corruption prevention: to thoroughly and objectively analyze the reasonable suspicions of criminal corruption acts of the Clinic’s employees and to conduct investigations within the area of the competence: to analyze annually the complaints, received from natural and legal persons (requests, statements, etc.);

14. In the fact of corruption becomes evident or information about the fact of corruption is confirmed, and in case there is a suspicion for possible corruption act, to inform the Special Investigation Service, following the determined procedure.

**V. EXPECTED RESULTS AND ASSESSMENT CRITERIA**

15. The Programme seeks the following results:

15.1. to reduce the possibility of corruption manifestation;

15.2. to increase intolerance of corruption;

15.3. to increase the public confidence in the Clinic.

**VI. PROGRAMME IMPLEMENTATION**

16. The plan of the Programme implementation measures shall be developed for implementation of the Programme objectives, which defines the measures, aims, their implementation periods and the responsible persons.

17. The plan of the Corruption Prevention Programme implementation measures shall be an integral part hereof. It shall be confirmed and updated upon the order of the Clinic’s director, taking into account the potential or identified corruption manifestation areas in the Clinic, and implementation of this Programme.

18. The director of the Clinic shall be responsible for implementation of the specific measures, provided the Programme.

19. Upon request of the Special Investigation Service, the Clinic shall provide the information.