

NATIONAL REPORT

Whistleblowers' Protection in Lithuania



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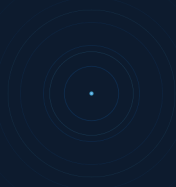
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Authors: Emilija Blaškevičiūtė, Ingrida Kalinauskienė, Ieva Dunčikaitė

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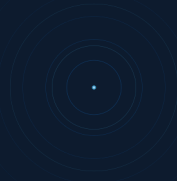
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KEY FINDINGS



Compliance with the EU Directive	Alignment with best practice and application in practice
<ul style="list-style-type: none">• Lithuania’s whistleblower protection framework is broadly aligned with the EU Whistleblower Protection Directive and covers both the public and private sectors.• The Law provides multiple reporting channels, including internal, external, and public disclosure mechanisms.• The Prosecutor General’s Office is a competent authority that plays a central oversight role by assessing reports and granting whistleblower status.• Key gaps remain regarding the effectiveness of penalties, procedural safeguards, access to full compensation for whistleblowers, and certain procedural requirements, such as the acknowledgement of receipt of the report within seven days and informing the reporting person of the disclosure of the information with sufficient notice as required by the Directive.	<ul style="list-style-type: none">• The Law demonstrates strong alignment with best practice in areas such as material scope, personal scope, support measures, and burden of proof.• Important weaknesses remain in reporting procedures, remedies for retaliation, and protections related to anonymous reporting.• Use of the whistleblowing system is increasing, with reports submitted to the Prosecutor General’s Office rising from 66 in 2022 to 97 in 2025¹. Last year 61% of applicants were granted whistleblower status².• Institutional transparency has improved through the dedicated website pranesktiesa.lt maintained by the Prosecutor General’s Office which provides guidance, support, and annual data reports on whistleblowing in Lithuania.• Practical challenges persist, including limited institutional resources, insufficient public awareness, and difficulties ensuring confidentiality during internal investigations.

KEY RECOMMENDATIONS



Compliance with the Directive

- **Strengthen remedies and compensation mechanisms.** Introduce clearer and more enforceable provisions ensuring full compensation for reporting persons who suffer retaliation, and ensure that remedies cannot be waived or limited.
- **Improve safeguards concerning anonymous reporting.** Clarify obligations for follow-up and communication in cases involving anonymous reports where contact remains possible.

Alignment with best practice

- **Strengthen visibility of the internal reporting channel.** Ensure that internal reporting procedures and channels are regularly communicated to employees and other eligible reporting persons through clear, visible, and easily accessible means, both physically and electronically. Moreover, introduce periodic publications of anonymised annual reports containing aggregated information on: the number of reports received, follow-up measures taken, and outcomes of investigations or proceedings.

Application in practice

- **Strengthen the institutional capacity of competent authority and other responsible institutions** by ensuring adequate human and financial resources for the implementation of whistleblower protection measures. This should include improved monitoring, data collection, interinstitutional coordination, and practical implementation guidance.
- **Promote ethical and open organisational cultures in both public and private sector institutions** by strengthening internal whistleblowing procedures, encouraging trust-based reporting environments, improving awareness of whistleblower rights and protections, and fostering regular exchange of best practices and practical experience among institutions responsible for implementing the Law on the Protection of Whistleblowers.

INTRODUCTION AND AIM OF THE REPORT

Whistleblowers are a driving force disclosing misconduct and exposing wrongdoings that threaten the public interest³. Globally, thousands of whistleblowers expose crimes across sectors—from environmental violations to financial fraud⁴—much of which would otherwise remain hidden, as illustrated by cases such as LuxLeaks and Edward Snowden’s disclosures⁵. In Lithuania, one of the earliest and most prominent whistleblower cases involved Rasa Kazėnienė, the former deputy director of Kaunas Prison, whose disclosures regarding public procurement violations preceded the full implementation of the whistleblower protection framework in Lithuania⁶. She later became the first person in the country to be officially granted whistleblower status in 2019, and her case contributed to significant changes in the management of the prison system following official investigations⁷.

Despite the legitimacy of whistleblowing as an activity serving the public interest, whistleblowers may face retaliation, including dismissal, reduced working hours, increased workloads, and other adverse working conditions, which can discourage individuals from reporting wrongdoing⁸. According to the 2025 Eurobarometer survey on citizens’ attitudes towards corruption, around 1 out of 3 (27 %) respondents believe that people may not report corruption because there is no protection for those reporting it⁹.

To ensure more equal standards of treatment and protection for whistleblowers across European Union member states, the EU adopted the EU Whistleblower Protection Directive (2019/1937). Member states were required to transpose the Directive into national law by 17 December 2021. As of 2026, all EU member states have adopted whistleblower protection legislation¹⁰. However, beyond the formal existence of legal frameworks, their practical effectiveness continues to vary considerably across jurisdictions. Although more than 60 countries worldwide — including all EU member states — now have some form of whistleblower protection legislation, comparative analyses demonstrate that many frameworks still provide only limited practical protection for whistleblowers¹¹.

National legal and institutional framework

Lithuania was one of the first countries in Europe to implement a whistleblower protection mechanism¹². The Law on Protection of Whistleblowers in Lithuania was passed already in 2017 and entered force on January 1, 2019. By 2026, around 300 individuals have been officially recognized as whistleblowers¹³. In 2021, the Law was further amended to incorporate the EU 2019/1937 Directive¹⁴.

The Prosecutor General’s Office of Lithuania is the competent authority responsible for ensuring whistleblower protection and supervising the implementation of the legal framework¹⁵. The Law requires all organizations, including public institutions and private companies, to establish internal reporting channels that ensure confidentiality, protect the identity of whistleblowers, and facilitate the effective investigation of reported violations¹⁶.

Lithuania's whistleblower protection framework includes both internal and external reporting channels, allowing individuals to submit information directly to competent authority. The Prosecutor General's Office is also responsible for free consultations to individuals and institutions on matters related to the application of this law and communication on whistleblowers' protection.

Methodology

This report is a part of the initiative "Strengthening and fostering enabling environment for whistleblowers in the European Union (SAFE for Whistleblowers)", which is implemented by Transparency International Secretariat (TI-S), Transparency International Lithuania (TI Lithuania) and seven other TI chapters.

The aim of this report is to assess the national legal and institutional framework for whistleblower protection in Lithuania, identifying key gaps, weaknesses, and areas for improvement in light of the EU Whistleblower Protection Directive and internationally recognised best practices. The assessment is based on TI-S methodology and guidelines.

The methodology adopts a modular approach consisting of two parts: (1) assessment of compliance with the EU Whistleblower Protection Directive, and (2) assessment against internationally recognised best practice standards. The assessment framework is structured around 25 indicators grouped under four dimensions: (I) Scope, Definitions, and Conditions for Protection; (II) Reporting Channels and Procedures; (III) Protection Measures; and (IV) Transparency and Accountability Measures. The structure of the indicators broadly mirrors the structure of the EU Directive.

Each indicator contains a varying number of assessment criteria, ranging from one to thirteen, which were evaluated individually. Compliance with the EU Directive was assessed according to whether national legislation fully, partially, or did not comply with the relevant criteria. The percentages presented in the assessment reflect the proportion of criteria fulfilled under each indicator. In parallel, the legislation was assessed against internationally recognised best practice standards and rated as Strong, Moderate, or Weak depending on the extent to which the relevant best practice criteria were met.

The indicators largely adopt the terminology of the EU Directive in order to facilitate assessment of legislative compliance. Key terms used throughout the assessment are provided in the annex and are based on the Transparency International Secretariat methodology.

RESULTS

This section presents the main results of an assessment of the Lithuanian legal framework in relation to the EU Whistleblower Protection Directive, as well as its alignment with recognised international best practices.

I. Scope, definitions, and conditions for protection

	Compliance with the EU Directive	Alignment with best practice
Material scope: Reportable information	Partial (83 per cent compliance)	Strong ●●●
Personal scope: Public and private sectors	Full (100 per cent compliance)	Strong ●●●
Personal scope: Definition of a reporting person	Full (100 per cent compliance)	Strong ●●●
Personal scope: Protected third parties	Full (100 per cent compliance)	Moderate ●●○
Conditions and thresholds for protection	Full (100 per cent compliance)	Weak ●○○

Lithuania’s whistleblower protection framework demonstrates strong alignment with both the EU Directive and international best practice in terms of scope and personal coverage. The Law adopts a broad and cross-sectoral approach, covering both public and private sectors and extending protection to a wide range of individuals, including employees, former employees, trainees, volunteers, contractors, shareholders, and persons involved in recruitment processes. It also recognises multiple forms of wrongdoing, including corruption, abuse of authority, threats to public health or the environment, and breaches affecting the financial interests of the European Union. Importantly, the legislation protects individuals who report in good faith based on reasonable grounds, including those who submit reports anonymously.

At the same time, several areas could be further strengthened to better reflect emerging international standards. While the Law protects facilitators, colleagues, and legal entities connected to whistleblowers, it does not explicitly extend protection to civil society organisations who assist whistleblowers outside formal work-related contexts. In addition, protection remains linked to work-related reporting and does not fully cover persons intending to report wrongdoing or refusing to participate in misconduct. The legislation could also clarify that protection applies irrespective of any “public interest” requirement, which may otherwise create ambiguity in practice.

Application in practice: Since 2021, the number of reports submitted to the Prosecutor General’s Office has increased, from 66 in 2022 to 97 in 2025¹⁷. In addition, a growing proportion of reports met the legal requirements for whistleblower protection, resulting in an

increase in the number of individuals granted whistleblower status — 58% in 2021 compared to 61% in 2025¹⁸.

II. Reporting channels and procedures

	Compliance with the EU Directive	Alignment with best practice
Multiple reporting avenues	Partial (80 per cent compliance)	Moderate ● ● ○
Obligations for public and private entities	Full (100 per cent compliance)	Strong ● ● ●
Internal reporting and follow-up: Procedures	Full (100 per cent compliance)	Moderate ● ● ○
Internal reporting and follow-up: Information and communication	Full (100 per cent compliance)	Weak ○ ○ ○
Establishing external reporting mechanisms	Partial (71 per cent compliance)	Moderate ● ● ○
External reporting and follow-up: Procedures	Partial (83 per cent compliance)	Weak ○ ○ ○
External reporting and follow-up: Information and communication	Full (100 per cent compliance)	Moderate ● ● ○
Public disclosures	Full (100 per cent compliance)	Strong ● ● ●

Lithuania performs particularly well in establishing multiple reporting avenues and clear procedural safeguards. The framework provides for internal reporting, external reporting to competent authorities, and public disclosures, while requiring both public institutions and larger private entities to establish reporting channels and follow-up mechanisms. Internal procedures include confidentiality guarantees, written and oral reporting options, designated impartial staff, record-keeping obligations, and feedback requirements. The legislation also establishes independent external reporting channels and provides minimum procedural standards, contributing to a relatively comprehensive reporting system aligned with the EU Directive and best practice standards.

Nevertheless, several areas could be further strengthened. Lithuania continues to place certain conditions on direct external reporting, which may limit flexibility for reporting persons seeking to bypass internal channels. The framework could also benefit from clearer

opportunities for reporting persons to clarify reports and comment on follow-up outcomes, and requirements to designate staff responsible for whistleblower protection. In addition, the legislation could further strengthen accountability by introducing more effective, proportionate, and dissuasive penalties for failures to implement reporting mechanisms or follow up on reports, while also ensuring more consistent follow-up of anonymous reports.

Application in practice: According to a 2023 study by Transparency International Lithuania¹⁹, individuals responsible for managing internal reporting channels often face difficulties in practically implementing legal requirements once a report is received. The study also found that confidentiality is not always fully ensured during internal investigations, contributing to a greater preference among individuals to report anonymously in order to avoid potential negative repercussions. In addition, public awareness of the Whistleblower Protection Law remains limited, with many citizens unfamiliar with the rights and protections guaranteed under the Law. The study further noted that some institutions responsible for implementing the Law continue to face resource constraints.

III. Protection measures

	Compliance with the EU Directive	Alignment with best practice
Duty of confidentiality	Partial (83 per cent compliance)	Weak ○ ○ ○
Data protection	Full (100 per cent compliance)	Strong ● ● ●
Anonymity	Full (100 per cent compliance)	Moderate ● ● ○
Prohibition of retaliation	Partial (80 per cent compliance)	Moderate ● ● ○
Support measures	Full (100 per cent compliance)	Strong ● ● ●
Protection measures against retaliation: Rights and remedies	Partial (71 per cent compliance)	Weak ○ ○ ○
Protection measures against retaliation: Burden of proof	Full (100 per cent compliance)	Strong ● ● ●
Protection measures against retaliation: Waiver of liability	Partial (75 per cent compliance)	Moderate ● ● ○

	Compliance with the EU Directive	Alignment with best practice
Protection measures for persons concerned	Partial (80 per cent compliance)	Strong ● ● ●
Penalties	Full (100 per cent compliance)	Strong ● ● ●

Lithuania’s legal framework contains a number of strong protection measures for whistleblowers. The legislation provides safeguards for confidentiality, protection against retaliation, and access to reporting channels that permit anonymous disclosures. It also establishes protections for related third parties and recognises retaliation broadly, which is consistent with international standards. The Law further includes mechanisms for follow-up and disciplinary action against retaliatory conduct, helping to strengthen institutional accountability and encourage reporting. Overall, Lithuania demonstrates a comparatively advanced legal framework in ensuring that individuals can report wrongdoing without fear of direct reprisals.

However, several areas of the protection framework could be further strengthened. The assessment highlights gaps regarding access to full compensation and reparation for whistleblowers who suffer retaliation, as well as only partial provision of effective, proportionate, and dissuasive penalties for retaliation, breaches of confidentiality, and abusive proceedings against reporting persons. The legislation could also provide stronger safeguards regarding confidentiality, including obligations to inform reporting persons sufficiently in advance when their identity may be disclosed, and better clarify the relationship between whistleblower protection and data protection rules. In addition, while anonymous reporting is possible, the framework does not consistently require anonymous reporting channels.

Application in practice: The website dedicated to whistleblower protection, pranesktiesa.lt, administered by the General Prosecutor’s Office, provides information on whistleblowers’ rights, reporting procedures, and available support mechanisms. In addition, the number of consultations provided through the whistleblower hotline has steadily increased from 218 in 2021 to 259 in 2025²⁰. According to a 2023 study by Transparency International Lithuania, however, reputational risks for companies appear to be a more effective incentive for compliance than the financial penalties currently established under the legal framework²¹.

IV. Transparency and accountability measures

	Compliance with the EU Directive	Alignment with best practice
Transparency, participation and review	Full (100 per cent compliance)	Moderate ● ● ○
Whistleblowing authority	Full (100 per cent compliance)	Moderate ● ● ○

Lithuania’s whistleblowing framework benefits from a relatively clear institutional structure for external oversight and accountability. Competent authority is formally designated to receive and follow up on reports, and the legislation establishes obligations for institutions to maintain reporting procedures and confidentiality standards. The framework also incorporates review and follow-up mechanisms that support institutional accountability and help ensure that reports are not ignored.

At the same time, transparency and accountability mechanisms could be made more robust. The assessment notes the absence of stronger requirements for regular public reporting, systematic reviews of reporting procedures, and more explicit guarantees regarding adequate resources for competent authority. The Law could also provide clearer obligations for stakeholder consultation and participation in the development and monitoring of whistleblowing systems.

Application in practice: The General Prosecutor’s Office website dedicated to whistleblower protection, pranesktiesa.lt, provides national-level data on the implementation of whistleblowers’ protection measures. The published information includes statistics on reports received, court decisions, decisions related to the protection, support, and encouragement of whistleblowers, consultations provided to reporting persons, as well as capacity-building initiatives and public awareness campaigns. A 2023 study by Transparency International Lithuania found that resource constraints continue to affect the effective implementation of whistleblower protection measures²².

CONCLUSION

Overall, the assessment demonstrates that Lithuania has established a comprehensive whistleblower protection framework that is largely aligned with the requirements of the EU Whistleblower Protection Directive and, in many areas, reflects internationally recognised best practices. The legal framework is particularly strong in terms of its broad personal and material scope, the availability of multiple reporting channels, and the existence of key protection measures for reporting persons. Recent trends, including the increasing number of reports submitted and consultations provided, also suggest growing awareness and use of the whistleblower protection system in practice.

At the same time, the assessment identifies several areas where the framework could be further strengthened, such as ensuring stronger safeguards against retaliation, improving access to full compensation, strengthening confidentiality guarantees, and enhancing the effectiveness of reporting and follow-up procedures, particularly in relation to anonymous reporting. The findings also highlight persistent implementation challenges, including limited institutional resources and uneven practical application of procedural safeguards.

Taken together, the assessment indicates that while Lithuania has made significant progress in developing its whistleblower protection framework, continued efforts are needed to strengthen implementation capacity and further align the system with evolving international best practice standards.

Annex 1. Key terms

Whistleblowing: communicating information on breaches (see below) to individuals or entities believed to be able to effect action.

Breaches: unlawful or abusive acts or omissions (the wrongdoing that is the subject of the whistleblowing report or disclosure).

Reporting person: an individual who reports or publicly discloses information regarding a breach (i.e. the whistleblower).

Internal report: a whistleblowing report made within a public or private organisation (i.e. within the workplace).

External report: a whistleblowing report made to the competent authority(ies).

Public disclosure: making information on breaches available in the public domain, either by publishing the information, for example on online platforms and social media, or by reporting the information to stakeholders such as the media, elected officials, civil society organisations, legal associations, trade unions, or business/professional organisations.

Retaliation: any form of disadvantage, discrimination or unfair treatment linked with whistleblowing which can occur not only as a result of deliberate actions or omissions, but also through negligence in dealing with whistleblowing.

Follow-up: action taken by the recipient of a whistleblowing report, or any competent authority, to assess the accuracy of the allegations made and, where relevant, to address the breach reported, including through actions such as an internal enquiry, an investigation, prosecution, an action for recovery of funds, or the closure of the procedure.

Competent authority: any national authority designated to receive and follow up on external reports.

Person concerned: a natural or legal person who is referred to in a whistleblowing report or disclosure as a person responsible for the breach or associated with the person responsible for the breach.

ENDNOTES

¹ Prosecutor General of the Republic of Lithuania, Reports on Whistleblowers' Protection 2019-2025, <https://www.pranesktiesa.lt/dokumentai/27#c-6/t-23>.

² Prosecutor General of the Republic of Lithuania, Reports on Whistleblowers' Protection 2025, <https://www.pranesktiesa.lt/data/public/uploads/2026/02/praneseju-apsauga-2025-m.-1.pdf>.

³ Transparency International, *How Well Do EU Countries Protect Whistleblowers?*, 2023, https://files.transparencycdn.org/images/2023_How-well-do-EU-countries-protect-whistleblowers_EN.pdf.

⁴ NAVEX. 2026 Whistleblowing & Incident Management Benchmark Report, 2026, <https://www.navex.com/en-us/northstar/whistleblowing-statistics-benchmark-report/#introduction>.

⁵ European Parliament Briefing. Protecting Whistleblowers in the EU. [https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/747103/EPRS_BRI\(2023\)747103_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/747103/EPRS_BRI(2023)747103_EN.pdf).

⁶ LRT, "Kandidatas į teisingumo ministrus politinės korupcijos byloje gina R. Kurlianską", 2018, https://www.lrt.lt/naujienos/lietuvoje/2/209474/kandidatas-i-teisingumo-ministrus-politines-korupcijos-byloje-gina-r-kurlianski?srsId=AfmBOooPaN9z2KCVR6fYmjXHYn5n_ybX05K5I6IywSTCLs2BB7iYZ4kx.

⁷ LRS, Seimo narės Agnės Bilotaitės pranešimas: "Pranešėjų apsaugos įstatymas turi būti priimtas kuo greičiau", 2018, https://www.lrs.lt/sip/portal.show?p_r=38282&p_k=1&p_t=175390&printVersion=1.

⁸ European Commission, Impact Assessment: Accompanying the document Proposal for a Directive of the European Parliament and of the Council on the protection of persons reporting on breaches of Union Law, 2018. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=SWD%3A2018%3A0116%3AFIN>.

⁹ European Commission, Eurobarometer 561: Citizens' Attitudes Towards Corruption in the EU in 2025, <https://europa.eu/eurobarometer/surveys/detail/3361>.

¹⁰ EUR-Lex, National Transposition by Member States (2019/1937), <https://eur-lex.europa.eu/legal-content/EN/NIM/?uri=CELEX:32019L1937>.

¹¹ Transparency International, *How Effective Is Whistleblower Protection in the EU?*, 2025, <https://www.transparency.org/en/publications/whistleblower-protection-eu-trends-gaps-practices-member-states>.

¹² EU Whistleblowing monitor: www.whistleblowingmonitor.eu/

¹³ Counted by TI Lithuania, source: Prosecutor General of the Republic of Lithuania, Reports on Whistleblowers' Protection 2019-2025, <https://www.pranesktiesa.lt/dokumentai/27#c-6/t-23>.

¹⁴ European Commission, Protection for Whistleblowers. European Commission, 2024, https://commission.europa.eu/topics/human-rights/your-fundamental-rights-eu/protection-whistleblowers_en.

¹⁵ Prosecutor General of the Republic of Lithuania, Pranešėjų apsauga, <https://www.prokuraturos.lt/lt/veikla/praneseju-apsauga/8266>.

¹⁶ Republic of Lithuania Law Whistleblower's Protection, No XIII-804, adopted 28 November 2017. <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/3832a702d8ea11e782d4fd2c44cc67af/asr>.

¹⁷ Prosecutor General of the Republic of Lithuania, Reports on Whistleblowers' Protection 2019-2025, <https://www.pranesktiesa.lt/dokumentai/27#c-6/t-23>.

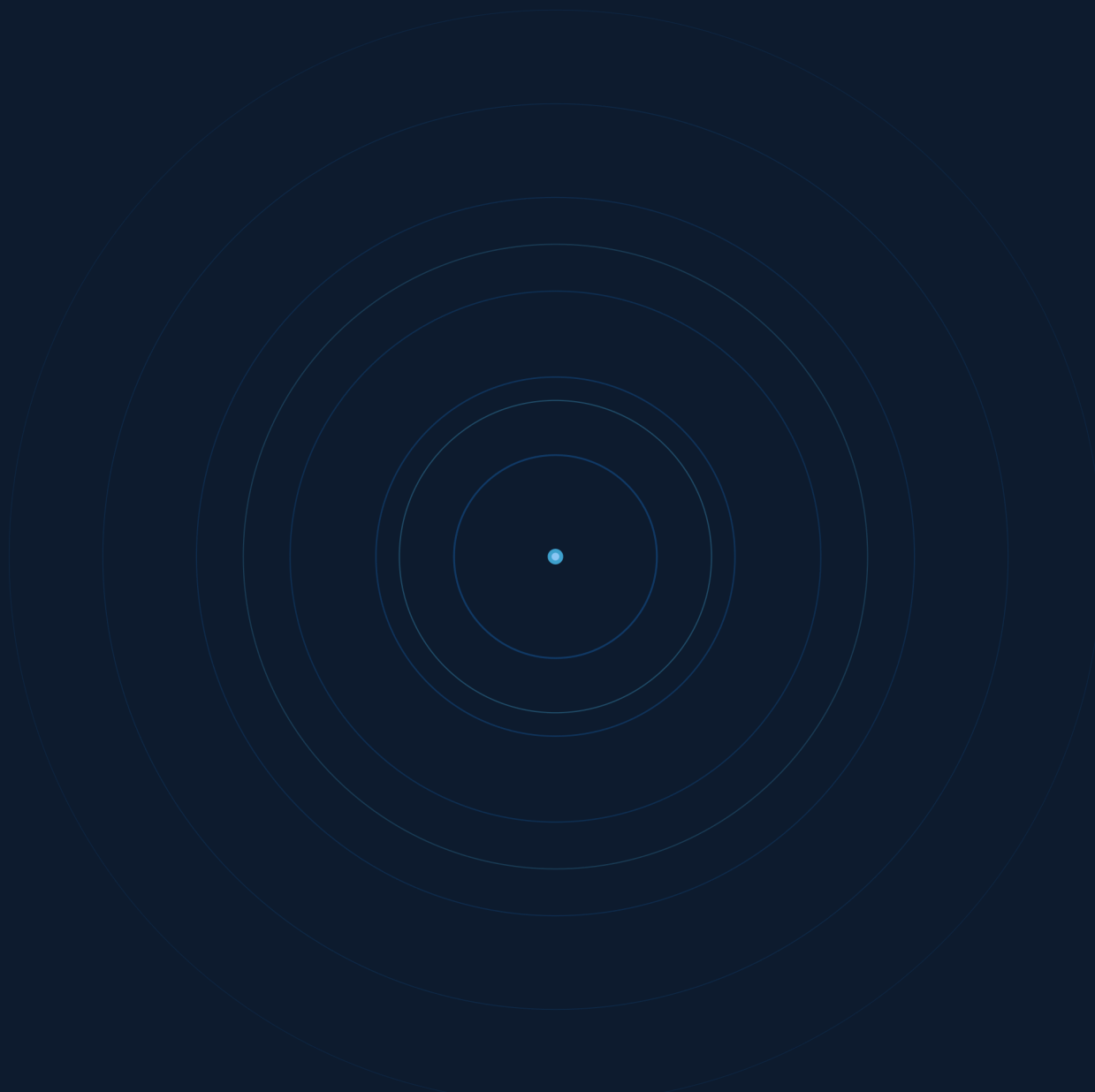
¹⁸ *ibid*

¹⁹ Transparency International Lietuvos skyrius, *Pranešėjų apsauga Lietuvoje: kaip gerai apsaugome pranešančius asmenis?*, 2023, <https://transparency.lt/wp-content/uploads/2023/09/Praneseju-apsauga-Lietuvoje.pdf>.

²⁰ Prosecutor General of the Republic of Lithuania, Reports on Whistleblowers' Protection 2019-2025, <https://www.pranesktiesa.lt/dokumentai/27#c-6/t-23>.

²¹ Transparency International Lietuvos skyrius, *ibid*.

²² *ibid*.



info@transparency.lt
www.transparency.lt