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Higher Education Sector Corruption Risk Assessment Guidance with checklists

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Higher Education Sector CRA Guidance with checklists

1. Introduction

Regional Anti-Corruption Initiative (RAI) in partnership with United Nations Office on Drugs and Crime (UNODC) implements a three-year project titled Southeast Europe - Together Against Corruption (SEE-TAC).¹ Project activities, among others, include the development of guidance with checklists for sectoral Corruption Risk Assessment analyses for the two identified corruption-prone sectors and the accompanying national and regional capacity building activities (tailor-made training exercises based on developed 'sectoral guidance with checklists' tools in two common corruption-prone sectors for all targeted jurisdictions).² For the needs of the preparation of the project activities towards the national and regional mapping of the sectors that should be subject of interventions, the following steps were taken by the RAI Secretariat and Corruption Risk Assessment Expert Team:

- **Comprehensive Survey** - The first method implemented was a desk-research based on reviewing the most relevant national anti-corruption documents (strategies, action plans, policies, the surveys of the relevant international organizations present in the country and the CSOs involved in anti-corruption). The regional context was explored through the review of the findings and recommendations from the relevant anti-corruption and integrity monitoring mechanisms reports (European Commission, GRECO, UNCAC Review Cycles), and the results from the regional and international corruption perception surveys (Balkan Barometer, TI Corruption Perception Indexes, TI Global Barometer, etc). The second method implemented was the questionnaire which included questions on the corruption-prone zones in targeted jurisdictions to determine the beneficiaries' perspective and feedback necessary for mapping corruption-prone sectors of common interest.
- **Determining main criteria for mapping of common sectors** from the perspective of further project activities in the field of Corruption Risk Assessment (CRA) and Corruption Proofing of Legislation (CPL) in targeted jurisdictions.
- **Organizing bilateral meetings and consultations with representatives of relevant public institutions from targeted jurisdictions.** The main aim of these meetings was to present the RAI Project, approach that will be used and to identify sectors that should be subjects of interventions in the field of CRA and CPL in the respective jurisdictions.

Following these steps, at a regional meeting in July 2021, representatives of all targeted jurisdictions and other jurisdictions targeted by the SEE-TAC project agreed that **the Higher Education Sector is one of the corruption-prone sectors of common interest and that this sector should be subject to specific CRA Guidelines with checklists.**³

¹ More details are available at <https://rai-see.org/what-we-do/see-tac/>

² Albania, Bosnia and Herzegovina, Montenegro, and North Macedonia. These jurisdictions have been targeted based on the previous phase of the project, and expressed interest of the beneficiaries and representatives of RAI Steering Group member countries

³ <https://rai-see.org/rai-secretariat-organized-regional-meeting-on-mapping-sectors-prone-to-corruption/>

Methodologies of research and structure of Guidance

The primary research method for this activity was desk analysis of legislative, institutional and organizational frameworks and practice for the Higher Education Sector in four targeted jurisdictions, including available data on gender equality principle (e.g. available relevant international and national reports and surveys on corruption and corruption risks in the Higher Education Sector in targeted jurisdictions, key anti-corruption documents and policies for the Higher Education Sector of targeted jurisdictions, integrity plan models for the Higher Education Sector, and other documents submitted by stakeholders from four targeted jurisdictions).

To obtain additional information on identifying the sectoral overall objectives and specificities, and to determine common corruption risk areas/processes and corruption risks and corruption risk factors in these areas/processes, the CRA Expert Team prepared the questionnaire for stakeholders from targeted jurisdictions.⁴ Twelve representatives of stakeholders responded to the questionnaire. Their responses and attitudes represented a valuable basis for developing this document and were incorporated into the text.

The main objective of the Guidance is to assist national jurisdictions in identifying and decreasing corruption risks and corruption risk factors in the Higher Education Sector.

The document contains two main components: a) Guidance for CRA in Higher Education Sector, and b) Checklists for four common corruption-prone areas/processes in the higher education sectors of targeted jurisdictions. In the first section, the document deals with the purpose of the Guidance; defining the most important terms; international standards in the field of CRA and practice in the field of CRA for the Higher Education Sector, and context of this sector in regional perspectives. The second section represents an overview of four common corruption-prone areas and the most vulnerable processes within these areas in the higher education sectors of targeted jurisdictions with identified common corruption risks and control questions related to defining measures for mitigating described risks.

⁴ National anti-corruption authorities, and Higher Education Sector competent institutions from targeted jurisdictions.

2. Guidance for CRA in Higher Education Sector

2.1. Purpose of the Guidance – why it is important to assess corruption risks in the Higher Education Sector and how using the checklists can reduce these risks?

Assessing corruption risks is essential for the long-term successful operation of different parts of corruption-prone sectors. If not managed, the corruption risks will sooner or later expose an institution or process to the possibility of officials/employees engaging in corrupt or unethical behaviour. If a corruption or an integrity breach does occur, the short and long-term consequences for particular institution or sector include loss of reputation, loss of public confidence, direct financial loss, wasted resources, cost of criminal justice or audit system to respond to corruption, adverse effects on other staff and negative impact on the morale of the institution/s.⁵ Having that in mind, assessing corruption risks, especially in corruption-prone sectors is an important tool with significant benefits: a) it keeps the corruption prevention, integrity and good governance issues on the agenda and takes a step forward from a pure legalistic approach; b) it enables identification of common risks (for example, through centralized risks register) across a given sector that requires legislative or broader institutional/national action or reform; c) it enables sharing of knowledge and good practice on risk identification and, in particular, on risk mitigation measures within a particular sector or across sectors, institutions, or processes; d) it enables effective exchange of good practices and/or establishment of a centralized corruption risk register that serves as a source of inspiration, ideas and peer-support for reform and good governance in concrete sector. To achieve these goals, any approach to corruption risk assessment should focus on analysing real life processes and procedures in the institution, sector or project. In addition to being a tool of proactive corruption risk management, assessing corruption risks could help in: strengthening the coherence, quality of governance and management in a given public sector institution or sector; enabling evaluation of workflow and processes and identification of weak spots for further institutional, management and legal reform; and improving the institutional and legal environment in a given sector.⁶

Corruption in the higher education sector is a growing global problem with grave implications for societies.⁷ Universities in developing countries face unique challenges arising from the recent liberalization and subsequent rapid expansion of the subsector. Corruption in the Higher Education Sector ruins the universities' reputations, blocks access for applicants who do not meet the requirements and wastes money spent on students who are not capable. Also, it can threaten public health, safety, and well-being when unqualified and incompetent graduates in professional fields are entrusted with construction, medical practice, and other functions.⁸

All targeted jurisdictions identified Higher Education as one of the corruption-prone sectors. In all targeted jurisdictions, common corruption-prone areas/processes could be identified

⁵ See Ljiljana Selinšek, *Corruption Risk Assessment in Public Institutions in South East Europe – Comparative Research and Methodology*, Sarajevo: Regional Cooperation Council, 2015, available at: https://rai-see.org/wp-content/uploads/2015/10/CRA_in_public_inst_in_SEE-WEB_final.pdf

⁶ *Ibid*

⁷ <https://www.u4.no/publications/corruption-in-universities-paths-to-integrity-in-the-higher-education-subsector.pdf>

⁸ *Ibid*

for this level of education (e.g. accreditation of higher education institutions and their programs, quality assurance and control of work of higher education institutions, students' exams; and hiring and promotion of teacher staff).⁹

The Higher Education Sector in all targeted jurisdictions contains a broad circle of institutions that implement education policies (universities, faculties, scientific institutes, bodies for accreditation and quality assurance, etc.). Also, in all jurisdictions, higher education institutions have a proclaimed high level of autonomy and competence to self-regulate many issues. This fact represents a significant challenge related to uniform identification of corruption risks and risk factors, and consequently to formulation of generally applicable measures for their mitigation. However, this challenge could be addressed through the improvement of efficiency in the coordination and cooperation among all relevant stakeholders in the Higher Education Sector in jurisdictions and regular use of available CRA tools, including this document.

Following the importance of assessing corruption risks, this document aims to outline the common corruption-prone areas and the most vulnerable processes within these areas in the higher education sectors of targeted jurisdictions, identified common corruption risks and control questions related to defining measures for mitigating described risks. In other words, this document offers an overview of the most prevalent corruption risks and risk factors in the Higher Education Sector within selected common corruption-prone areas/processes of targeted jurisdictions, and key questions related to the efficient mitigating these risks. The checklists can provide only a basic set of questions with the direction into which one should look. One needs to tailor the questions to the specific circumstances and needs to exercise close scrutiny of all details in legislation and practice in every single jurisdiction linked to each question.

Having this in mind, the Guidelines are primarily dedicated to stakeholders that participate in the preparation and adoption of relevant public policies and regulations for the Higher Education Sector, including the anti-corruption policies and rules – competent ministries, anti-corruption bodies, councils for higher education, bodies for accreditation and quality assurance, and universities. For example, where applicable, anti-corruption institutions could use checklists for preparation of integrity plan models for the higher education institutions. Besides this, individual higher education institutions (faculties, for example) can use checklists to assess their internal policies and practices, as well as their compliance with activities in managing corruption risks identified though this intervention. In comparative and regional perspectives, applying guidance with checklists can provide valuable answers about similarities and differences in different jurisdictions in approaching corruption in the Higher Education Sector and represent a basis for exchange of experiences and good practices in this regard.

⁹ <https://rai-see.org/rai-secretariat-organized-regional-meeting-on-mapping-sectors-prone-to-corruption/>

2.2. Defining “Higher Education Sector”

The use of the term „Higher Education“ in this report is equivalent to the term „tertiary education“, as defined in the ISCED 2011 classification (UNESCO Institute for Statistics, 2021) Tertiary education builds on secondary education, providing learning activities in specialised fields of education. It aims at learning at a high level of complexity and specialisation. Tertiary education includes what is commonly understood as academic education but also includes advanced vocational or professional education. This comprises the short cycle, bachelor’s, masters’ or doctoral levels of education. The term higher education is used throughout this report rather than tertiary education due to its wider use in academic and policy literature.

The development of the national education systems of the Western Balkan countries since the break-up of Yugoslavia has been impacted by war and ethnic conflicts, by the process of nation-building, democratization, significant changes of economic and political system, and by European integrations. These developments have been accompanied by a steep reduction in government funding and the partial disintegration of education systems following the war, integration into the Bologna process and the European higher education area, and by structural reforms in the public sector which affected education.

2.3. Defining “corruption”, “corruption risks”, “corruption risk factors” and “corruption risk assessment”

For purposes of this document, the term “corruption” derives from the following international standards: Council of Europe Criminal Law Convention on Corruption (ETS 173)¹⁰; Council of Europe Recommendation (2000)10E 11 May 2000 on Codes of Conduct for Public Officials¹¹; and United Nations Convention against Corruption (UNCAC).¹² In other words, the term corruption goes beyond bribery and other forms of taking or giving undue advantage to officials in connection to their work or position in the higher education institutions. With the purpose of embracing a broad approach to CRA, the term “corruption”, where appropriate, includes breach of integrity, other unethical behaviour and other practices that are, if used by officials/employees, usually considered as corrupt (e.g. conflict of interests, shirking, revolving door etc.).

Corruption in the Higher Education Sector takes various forms, ranging from bribery in recruitment and admissions, nepotism and patronage in tenured postings, political and corporate undue influence in research, plagiarism, and other editorial misconduct in academic journals. Corruption in this sector exists at the systemic (fraud, undue influence, irregularities in accreditations, etc.) and individual (academic misbehaviour, plagiarism, cheating, conflict of interest, etc.) levels.¹³

Corruption risk represents the possibility of corruption, ethically and professionally unacceptable practices, or others irregularities that threaten the integrity of the institution/sector. Risk identification means recognizing all possible types - manifestation of

¹⁰ <https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=173>

¹¹ <https://rm.coe.int/16806cc1ec>

¹² <https://www.unodc.org/unodc/en/treaties/CAC/>

¹³ <https://knowledgehub.transparency.org/assets/uploads/topic-guides/Topic-Guide-Corruption-in-Education.pdf>

corruption, ethically and professionally unacceptable actions of certain actors in working processes - that may occur.¹⁴

Corruption risk factors are circumstances (on various levels) that can encourage, cause, or allow corrupt or unethical conduct. Each corruption risk comes from one or more factors. Most convenient typology of risk factors is the following:

- **External and systemic risk factors** - factors outside of the control of the institution or sector, of which they should or could be aware (unclear or inconsistent legislation regulating certain sector, field of work of the institution; unclear competences of the authorities; inefficient or incompetent oversight institutions or supervisory authorities).
- **Internal (organisational, institutional) risk factors** - factors within the control of the institution or sector, such as the rules and policies for good governance, management, decision-making, operational guidance, and other internal regulations enabling the organisation to fulfil its objectives, mission and tasks.
- **Individual risk factors** - factors that could motivate individual official/employee to commit corrupt or unethical conduct (lack of knowledge-ignorance, lack of practical skills-inexperience, pressures in the work environment, omission of conflicts of interest declaration).
- **Working process risk factors** - factors that arise from working procedures and processes in an institution (officials have high level of personal discretion and autonomy in decision making, non-transparent or unrecorded decision making, poor organisation of work processes, unconnected work processes and procedural gaps, resulting in no sense of responsibility or ignorance of competences, and lack of vertical or horizontal controls in the work processes).¹⁵

Identification and assessment of concrete corruption risks and risk factors following mentioned typology is essential for defining measures for mitigating these risks.

Corruption risk assessment represents a prevention tool for identification of corruption risks and risk factors in institutions/sectors with the purpose of developing and implementing measures for mitigation or elimination of those factors and risks. As such, corruption risk assessment is a management tool for improving governance of a specific public sector institution, or sector. If not managed properly, the corruption risks will sooner or later expose an institution, or sector to the higher possibility of public officials and staff engaging in corrupt or unethical behaviour. There are three different but connected approaches to the CRA: Integrity plan, sectoral CRA and targeted (ad hoc) CRA.

- **Integrity Plan** represents institutional self-assessment tool which addresses concrete organisational risk factors, factors arising from specific working processes and individual risk factors within concrete public institution. It is a most represented model in the SEE region.

¹⁴ See Ljiljana Selinšek, Corruption Risk Assessment in Public Institutions in South East Europe – Comparative Research and Methodology, Sarajevo: Regional Cooperation Council, 2015, available at: https://rai-see.org/wp-content/uploads/2015/10/CRA_in_public_ins_in_SEE-WEB_final.pdf

¹⁵ *Ibid*

- **Sectoral corruption risk assessment** is on the other hand focused more on systemic characteristics, challenges, and the position of a certain sector. More precisely, the sectoral CRA is focused more on systemic risk factors, as well as on risks and other risk factors that are essentially similar within all institutions inside the sector (for example, risk factors that refer to the public procurement system, to budgeting or to human resources management).
- **Ad hoc CRA** targets a particular project, or policy.

The practice shown that there is no reason why sectoral CRA should not be combined or complemented with integrity plan. In that sense, general sectoral corruption risk assessment can be done for the Higher Education sector, while every institution within this sector should prepare integrity plan/own corruption risk management plan. In this case, the sectoral CRA should identify the corruption risks on a macro level, while integrity plans/institutional corruption risk management plans should further address them on a micro level where very concrete and tailor-made measures can be taken to avoid or mitigate certain risks.

2.4. International standards and practice

There is no universal approach to CRA. The process depends on the needs or reasons which prompt an institution, a sector, or a country to conduct an assessment of corruption risks. The assessment procedure, as well as the success of the process, is largely influenced by the local environment and the culture of integrity. CRA is a tool devised originally in the private sector and developed as a part of business risk assessment of economic operators.

The United Nations Convention against Corruption (UNCAC) is the first international document whereby State Parties are bound to introduce effective and efficient risk management systems and internal control.¹⁶ The Technical Guide to the UNCAC (Guide) puts focus on internal control, i.e. internal audit, without further guidance as to what effective risk management systems are, what they should look like, what they contain, how the process is to be carried out, etc.¹⁷

One of the most comprehensive international standards in risk management is ISO standard 31000. Most methodologies designed for managing corruption risks at the institutional level, in the private and the public sector alike, directly rely on ISO standards 3100:2018. These standards provide the key terms on risk assessment and management.¹⁸

Within the context of corruption risk management, the ISO 37001 Anti-bribery management system is important.¹⁹ ISO has yet to publish publicly available guidelines on this standard.

Organization for Economic Co-operation and Development (OECD) has developed several documents containing recommendations and examples of best practices which are useful in

¹⁶ The United Nations Convention against Corruption (UNCAC), Art. 9, paragraph 2, item d, inter alia reads: Each State Party shall, in accordance with the fundamental principles of its legal system, take appropriate measures to promote transparency and accountability in the management of public finances. Such measures shall encompass, inter alia: d) Effective and efficient systems of risk management and internal control.

¹⁷ See 2009 United Nations Office on Drugs and Crime Vienna, Technical Guide to the United Nations Convention Against Corruption, pg. 40-42: <https://www.unodc.org/unodc/en/treaties/CAC/technical-guide.html>.

¹⁸ ISO 31000:2018 Risk management — Guidelines: <https://www.iso.org/standard/65694.html>

¹⁹ See at <https://www.iso.org/publication/PUB100396.html>

designing and conducting CRA on the national and institutional level in both private and public sector. More precisely in 2005, the OECD published the “Public Sector Integrity – A Framework for Assessment”²⁰ with the main purpose to present the experiences of different countries with the procedures of integrity assessment and preventive anti-corruption measures. Also, the 2017 OECD Recommendation on Public Integrity (Recommendation) is important²¹. The purpose of the Recommendation is to have the OECD Member countries, as well as non-Member countries build a coherent and comprehensive public integrity system.

Transparency International developed 10 good practice principles for effective corruption risk assessment that are of general nature and fully applicable to the Southeast European region as well.²² According to these principles, effective risk assessment (especially the institutional one) should: 1. have the full support and commitment from the superior or other senior management, 2. involve the right people to ensure a sufficiently informed and complete overview of the institution and its risks, 3. be comprehensive, taking account of all activities of the institution which may create significant corruption risk, 4. avoid preconceptions about the effectiveness of controls or the integrity of employees and third parties, and therefore focus on inherent risk, 5. identify and describe corruption risks in appropriate detail, 6. evaluate corruption risks by reference to a realistic assessment of likelihood and impact, 7. prioritise corruption risks to the extent that this is practical and meaningful, 8. be documented in such a way as to demonstrate that an effective risk assessment process has been carried out, 9. be regular, performed at appropriate intervals and otherwise in the event of significant changes affecting the public sector, 10. be communicated effectively, and designed in a way that facilitates effective communication and the design of appropriate policies, programmes and controls.

For the sectoral CRA in the Higher Education Sector, the following documents are of particular importance: Conceptual Framework – Corruption Risk Assessment at Sectoral Level, published by UNDP in 2018²³, and Monitoring Corruption and Anti-Corruption in The Sustainable Development Goals, published by Transparency International in 2017.²⁴ However, there is no international standard embracing all or most of the corruption risks in the Higher Education Sector. None of the international anti-corruption standards specifically refers to the higher education sector, but they “only” contain general provisions against corruption (prevention, criminalization, etc.).

In most countries that introduce integrity plans, competent anti-corruption bodies developed tailor made integrity plan models for institutions within the Higher Education Sector. These models contain identified risk areas/processes with accompanied corruption risks/risk factors, as well as proposals of measures for decreasing identified corruption risks/factors. However, having in mind that Integrity Plan represents institutional self-assessment tool that does not address systemic risk factors, its application has limited impact.

There are several international or national studies on corruption in the higher education sector of different jurisdictions. In most of the cases, these studies do not have a focus only

²⁰ https://read.oecd-ilibrary.org/governance/public-sector-integrity_9789264010604-en#page1

²¹ <https://www.oecd.org/gov/ethics/OECD-Recommendation-Public-Integrity.pdf>

²² [https://uk.practicallaw.thomsonreuters.com/4-537-0225?transitionType=Default&contextData=\(sc.Default\)#co_anchor_a915639](https://uk.practicallaw.thomsonreuters.com/4-537-0225?transitionType=Default&contextData=(sc.Default)#co_anchor_a915639)

²³ P. 30-38, available at, <https://discuss.tp4.ir/uploads/short-url/4XC1J0Hcxn87AA16WiFMAHLUmoq.pdf>

²⁴ P 34-48, available at [2017_MonitoringCorruptionSDGs_EN.pdf \(transparencycdn.org\)](https://www.transparencycdn.org/2017_MonitoringCorruptionSDGs_EN.pdf)

on CRA for this sector. However, they contain some findings on identified problems and recommendations that could be useful for potential normative, institutional and practical reforms in the Higher Education Sector.²⁵ Also, these documents were used as an additional source for verification of our research findings and identification of corruption risks and risk factors.

Lack of universal international standards in dealing with corruption risks in the Higher Education Sector, from the one side, and similarities and common framework and challenges in this sector (especially in the region targeted by this intervention) from the other side, justify the introduction of guidance with the checklists, as one important tool that can be applied at the regional level and that will contribute to the improvement of quality of this sector.

2.5. Context of Higher Education Sector in regional perspectives - good practices and areas for improvement

All targeted jurisdictions identified higher education as one of the priority areas for the public interest. Since all targeted jurisdictions declared EU integrations as one of the priorities, their higher education legislations were aligned with EU countries policies in this area. This process required substantial reforms in the Higher Education Sector that lasted for almost two decades and still are ongoing, with relatively different results (*Bolognian process*).

A central role in developing laws and public policies for the higher education sector have ministries of education. Also, in some jurisdictions, national councils for Higher Education are established as bodies responsible for the advancement and development of higher education through analysing the situation and achievements in higher education and making expert proposals to other competent institutions. The Higher Education Sector in all jurisdictions contains a broad circle of institutions (universities, faculties, scientific institutes, bodies for accreditation and quality assurance, etc.). Also, in all jurisdictions, higher education institutions have a proclaimed high level of autonomy and competence to self-regulate many issues. This fact represents a significant challenge related to uniform prescribing of all relevant rules. Having in mind all mentioned, all jurisdictions established a complex set of legislative and institutional frameworks for the Higher Education Sector.

Almost all jurisdictions recognize Higher Education Sector as corruption-prone and included it in anti-corruption strategic documents/public policies. Also, some of the jurisdictions developed sectoral strategies for the higher education. However, it seems that anti-corruption measures and measures from sectoral strategies are not sufficiently aligned. Also,

²⁵ For example, Ararat L. Osipian, *Grey Areas in the Higher Education Sector: Legality versus Corruptibility*, 2012 *BYU Educ. & L.J.* 141 (2012), available at: <https://digitalcommons.law.byu.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=1310&context=elj>, OECD Anti-Corruption Network for Eastern Europe and Central Asia, *Integrity of Education Systems - A Methodology for Sector Assessment*, 2018, <https://www.oecd.org/corruption/acn/OECD-ACN-Integrity-of-Education-Systems-ENG.pdf>, https://www.thebalkanforum.org/file/repository/Education_Briefing_ENG_FINAL.pdf, https://unesdoc.unesco.org/in/documentViewer.xhtml?v=2.1.196&id=p::usmarcdef_0000265784&file=/in/res_t/annotationSVC/DownloadWatermarkedAttachment/attach_import_0a156da8-248d-47ed-87b9-43bc3e697cce%3F_%3D265784eng.pdf&locale=en&multi=true&ark=/ark:/48223/pf0000265784/PDF/265784eng.pdf#MEP_Georgie.BAT.WEB.indd%3A.39467%3A898, https://eua.eu/downloads/content/western_balkan_report_final_-_2018_07_02.pdf, https://epoka.edu.al/mat/staff_guide.pdf

a problem identified in this sector is that the educational institutions still display relatively low awareness for addressing corruption²⁶. This causes an unclear division of responsibility and dispersion of ownership toward anti-corruption policies between educational institutions and anti-corruption agencies, even though there is a strong need to work jointly on this topic.

One of research findings is that most of the jurisdictions share similar problems with corruption in the Higher Education Sector and that common and similar interventions can be introduced.

While some of jurisdictions target the Higher Education Sector only though sectoral CRA (North Macedonia, for example), focus on some of jurisdiction is on self-assessment CRA tools (Serbia, Montenegro). Also, some jurisdictions (Bosnia and Hercegovina, for example) combine different approaches, while, according to the available data, only Albania does not consider the Higher Education Sector in its anti-corruption strategic documents, nor has CRA tool in place.

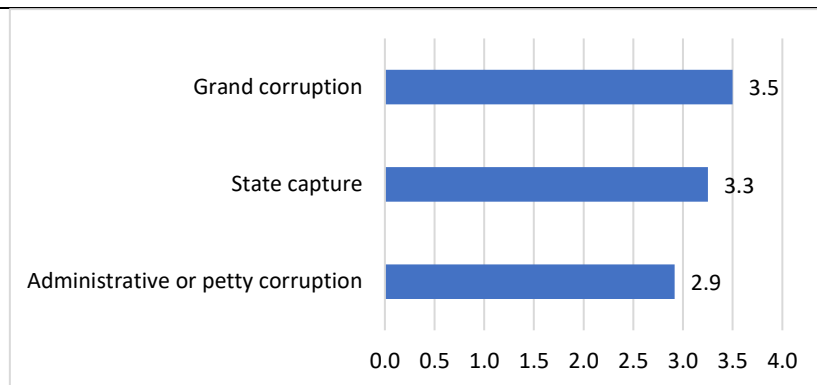
According to the available data, most of the research and reports on corruption in the Higher Education Sector comes from international organizations, projects, and civil society organizations. Also, research and reports are still focused mainly on identification of problems, corruption risks and perception of corruption, while there are very few reports that give answers on effects and results of anti-corruption efforts in this regard.

The level of corruption in the Higher Education Sector among surveyed jurisdictions is assessed as relatively moderate, **with score 5.6 on the scale from 1 to 10** (1 – no corruption, 10 – very high corruption). But another statistical measures (mode – 7, median 6.5) shows that there are more respondents that choose higher scores on the scale (above 6) than those who think that the level of corruption in the Higher Education Sector can be described as below the 5.

Grand corruption is a type of corruption that affects Higher Education Sector the most among other types, according to the collected responses. On the 1 to 5 scale, average score for influence of grand corruption on this sector is 3.5. State capture is on the second place, while representatives of relevant national jurisdictions believe that administrative or petty corruption endanger the Higher Education Sector the least. Nevertheless, scores for all three types of corruption are above average (2.5) and it can be concluded that, in general, corruption seriously affects Higher Education Sector.

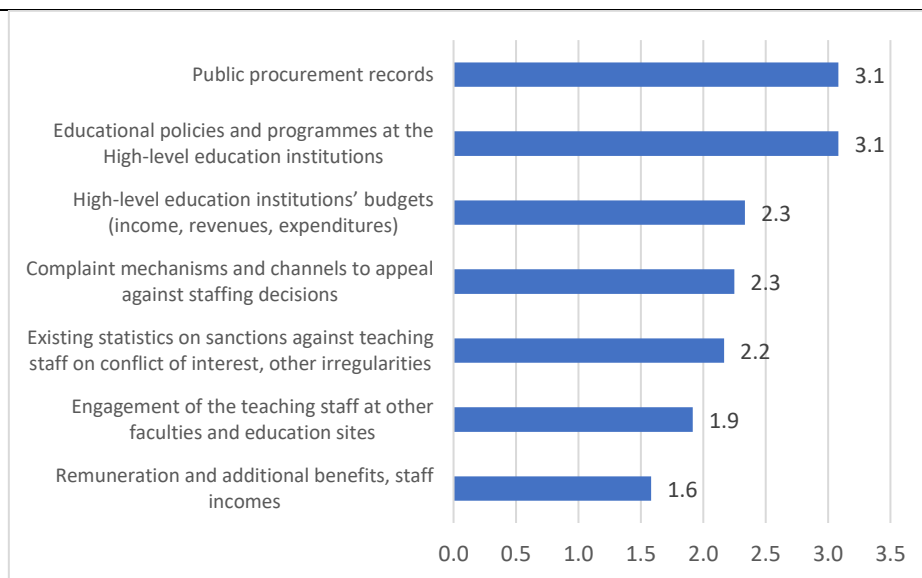
²⁶ Further explanation of the challenges in targeting corruption in HES can be seen, for example, in the National Strategy for Prevention of Corruption and Conflict of Interest (2021-2025), Republic of North Macedonia, available at https://dsk.mk/wp-content/uploads/2021/09/NACS-2021_25-and-Action-Plan-EN-final.pdf

To what the following endanger the proper functioning of Higher Education Sector, and consequently affect the quality of the Higher Education Sector services in your jurisdiction?



According to the survey results, there is a strong need to improve transparency in the work of the Higher Education Sector, especially in areas such as remuneration and additional benefits, staff incomes; engaging the teaching staff at other faculties, and availability of the statistics on sanctions against staff on the corruption, which are considered as the less transparent.

How would you assess the transparency, i.e., level of access to public information related to the following? (1 – Low transparency, 5 – High transparency)



Respondents were provided with the list of 17 forms of corruption in the Higher Education Sector and asked to rank them to identify those that are perceived as the most common and present in this sector. This question was aimed to further explore the connection between

identified corruption prone areas/processes with the corruption risks that need to be targeted in the Higher Education Sector. The three most common forms of corruption, as ranked by respondents, are **Nepotism, Plagiarism, and Cronyism**. On the other side, as the three less present forms of corruption, respondents ranked **Leaking confidential / sensitive information, Illicit enrichment, Charitable donations, and sponsorships**.

In order to identify causes of the most present forms of corruption in the areas/processes within the Higher Education Sector, questionnaire included this question, too. The aim of this question was to enable easier identification of potential measures in the checklists. As most common corruption risk factors, respondents selected **Lack of professional integrity, Lack of tailored training on ethics, conflict of interest, and compliance rules and Lack of active promotion of ethic, conflict of interest, and compliance rules**.

Representatives of relevant institutions and organizations from national jurisdictions are moderately satisfied with efforts in combating corruption in the Higher Education Sector in their jurisdictions. **Average score on the 1 to 5 scale is 3.**

In South Eastern Europe region (SEE) there is a severe lack of information about corruption and its implications on women that needs to be addressed from the aspect of perception and experienced based surveys. There are a lot of questions and hypotheses on the nature and consequences of the correlation between gender and corruption (for example, how often women face corruption, how widespread are gender forms of corruption, whether women are more often subject to corruption when requesting public services, to what extent are they recognized and adequately addressed in public discussions, policy documents and positive legal regulations in SEE, whether women report corruption more, and similar²⁷). To targets this complex relation, some of the most important questions are whether corruption affects more women than a man and are there corruption risks that are gender specific, i.e., corruption risks that are based on different relations built on differences among sex.

In Higher Education Sector, **sexual extortion (sextortion)** has been identified as one of the main forms of corruption, based on the relation of power, mostly between female students and male university staff, in which sex favours is the “currency of the bribe”²⁸. Therefore, besides the fact that this is a corruption-related problem, sextortion is a manifestation of gender discrimination and unequal power relations between men and women at the university.

The survey conducted among representatives of targeted jurisdictions was used to explore the gender and corruption in HES, and, accordingly, to introduce some of the gender related interventions on the CRA guidelines and checklist to target corruption in HES.

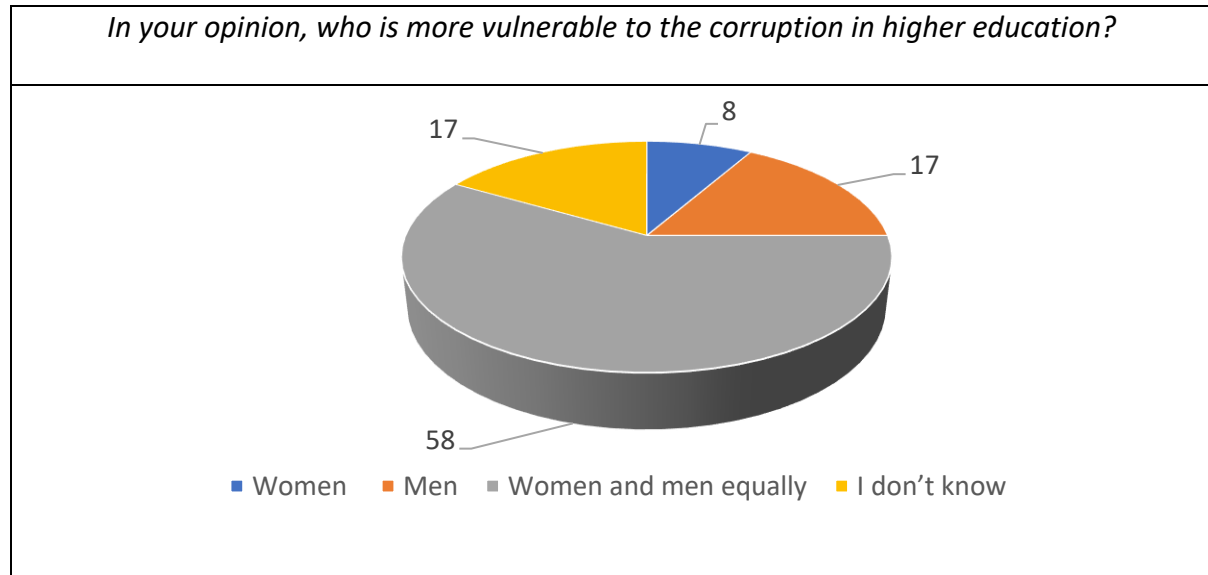
²⁷ For more information toward this topic, please see **The Time Is Now: Addressing the Gender Dimensions of Corruption**, UNODC, Vienna, 2020, available at

https://www.unodc.org/documents/corruption/Publications/2020/THE_TIME_IS_NOW_2020_12_08.pdf

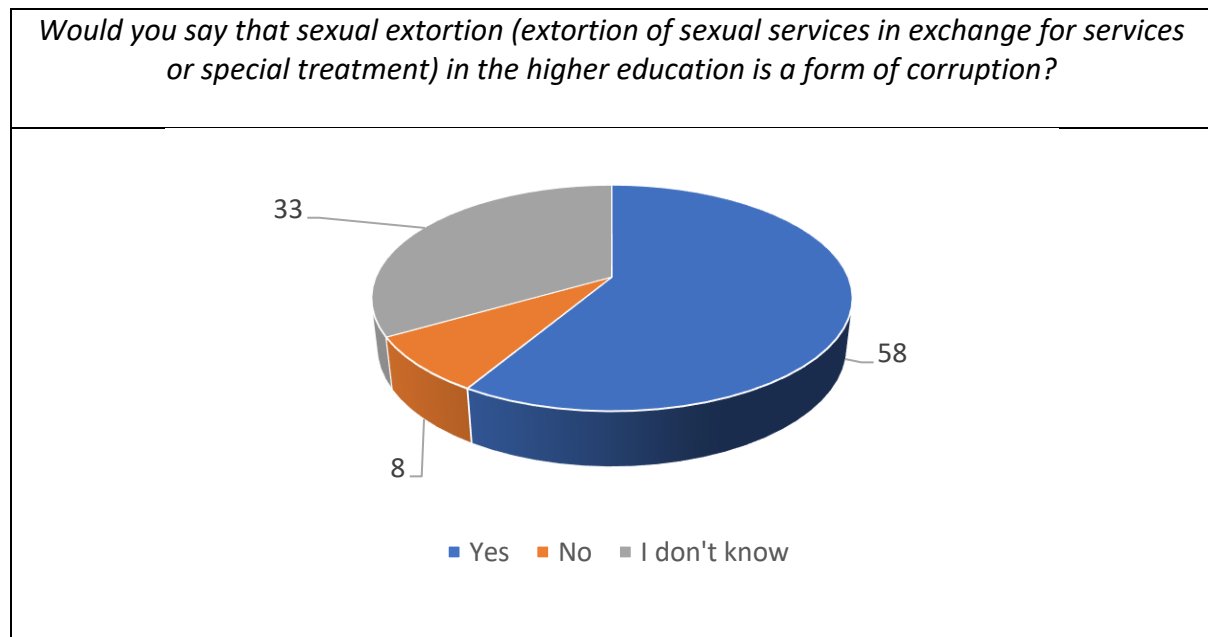
²⁸ For more information toward this topic, please see the following study: **Corruption in universities: Paths to integrity in the higher education subsector**, U4 Anti-Corruption Resource Center, 2019, available at:

<https://www.u4.no/publications/corruption-in-universities-paths-to-integrity-in-the-higher-education-subsector.pdf>

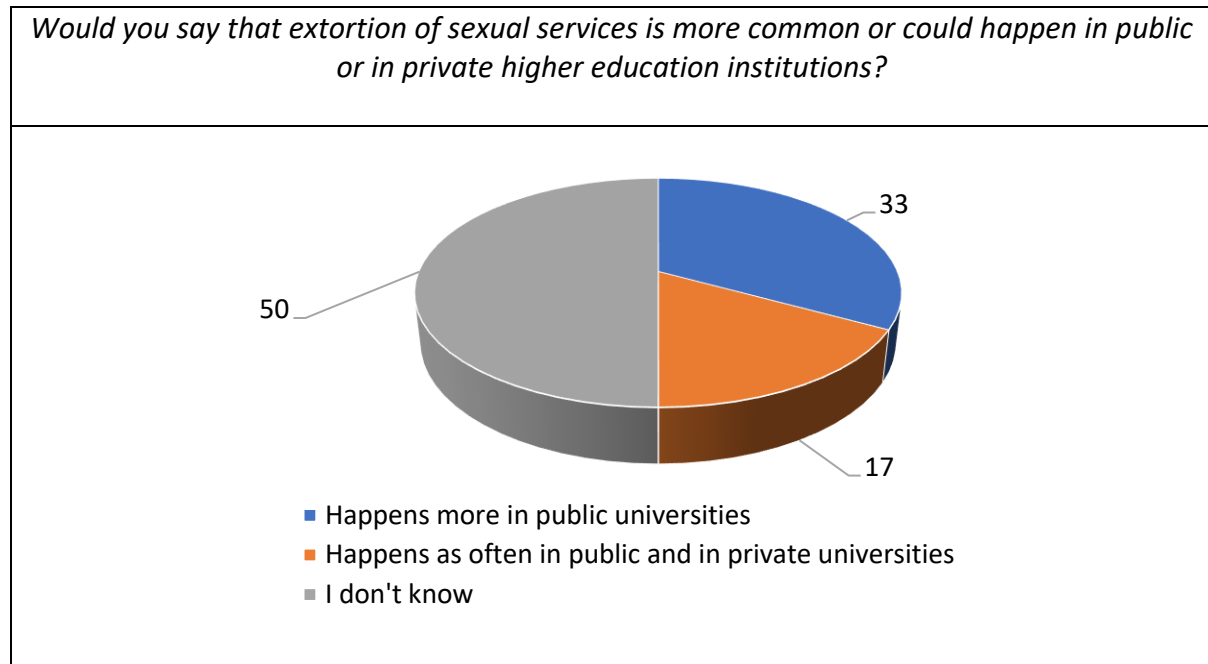
Most of the respondents believe that women and men are equally vulnerable to corruption in higher education (58%). In other words, representatives of stakeholders in targeted jurisdictions consider that there is no difference between man and women regarding corruption factors, risks or consequences.



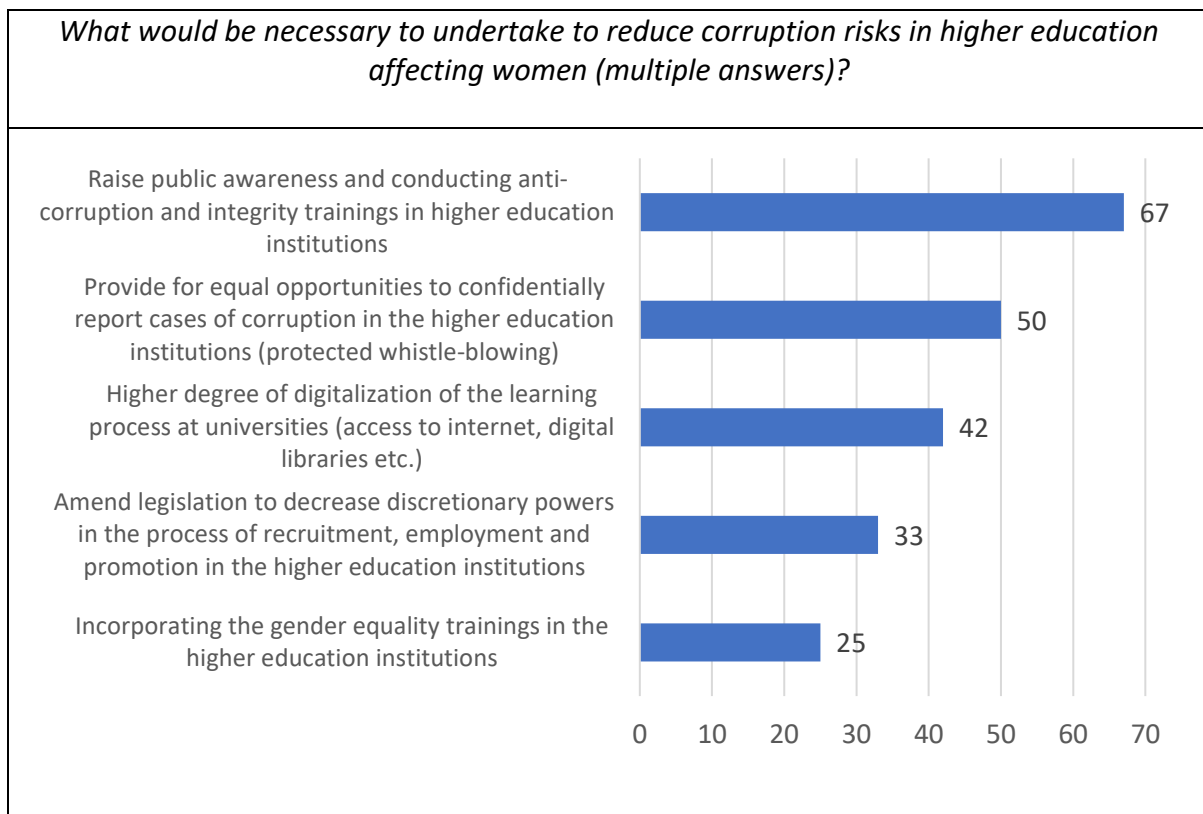
Despite the findings that most of the respondents believe that both men and women are equally vulnerable to corruption at the university, **a majority of the respondents (58%) recognize sexual extortion in higher education as a form of corruption.** One third of the respondents (33%) is not sure, i.e., do not know whether sextortion is a form of corruption. This very important finding shows that even though most of the important national stakeholders are aware that sexual extortion is corruption risk in HES, there is still a strong need for further research and for raising awareness about this important topic.



Half of the respondents do not know whether extortion of sexual services is more common or could happen in public or private higher education institutions. This finding implies that there are no sufficient data or surveys that deal with this issue. The public, even informed and involved public such as representatives of relevant organizations, does not know much about this problem. Among the other half of the respondents, more believe that sextortion is more present on public than on private universities. The reasons for this attitude should be a matter of further researches and analyses.



Among five potential activities aimed to reduce corruption risks in higher education affecting women, most respondents (67%) select *raising public awareness and introduction of anti-corruption and integrity trainings as the most important measure*. On the second place, set by 50% of respondents, *more efficient and effective whistle-blowing procedures* are stressed as necessary for targeting gender-related corruption in HES. These findings are essential for all stakeholders to plan further work on researching and targeting gender and corruption on HES.



Based on experiences of developing national anti-corruption policies and tools for combating corruption in Higher Education Sector, some examples of good practices can be identified, promoted, and further used for improving at the level of entire region.

Besides tackling on high strategic level, corruption in Higher Education needs to be targeted on institutional/sectoral level through different CRA tools. Autonomy of HES institutions require that each institution have to be hold accountable for reducing corruption risks. Integrity plans in Bosnia and Hercegovina, Montenegro and Serbia can be seen as examples of good CRA practice with the potential for further improvement. This improvement could be based on joint implementation of integrity plans for the higher education institutions and sectoral CRA for whole higher education sector. In this case, the sectoral CRA should identify the corruption risks on a macro level, while integrity plans should further address them on a micro level where very concrete measures can be taken to avoid or mitigate certain risks.

Closer and more intensive cooperation is needed between anti-corruption bodies and high education institutions during developing and implementing of anti-corruption measures and tools. So far, it seems that this cooperation is very modest. Higher education institutions are familiar with internal organizations, challenges and functioning of the sector, while anti-corruption bodies have broad experience and knowledge on anti-corruption policies. Exchange of experiences among jurisdictions is a space with high potential for improvement. CRA checklists is one of the ways to further work in this area.

Based on the assessment phase of the assignments, which included analysis of national anti-corruption policies in targeted jurisdiction, available anti-corruption tools and mechanisms, discussing and survey with beneficiaries, and researches and analysis toward corruption in HES, the following four areas were identified to be further operationalized through guidelines

and CRA checklists: **1) Students’ Exams, 2) Students’ and Scientific Work, 3) Teaching Staff Management and 4) Accreditation/issuing permits for private higher education institutions.** Since selected areas are complex and most of them include more than one process with relatively different corruption risks and measures to mitigate these risks, areas have been divided into processes as described in the table below. Further, the most common corruption risks in the processes were described, and questions to check measures for mitigating risks were defined for further use in CRA efforts, as described in the 2.6 Section of the Guidelines.

Identified areas and processes within Higher Education Sector to be included in the CRA checklists

Area	Process
Students’ Exams	Exams Scheduling
	Taking Exams
Students’ and Scientific Work	Students’ Works (essays, seminars, and other students’ written work during the studying as a part of exams)
	Students’ final graduate work, MA, and PhD thesis (works required for obtaining a certain level of degree)
	Scientific Work (work of professors/scientists published in journals required for promotion and career development).
Staff Management	Hiring of the teaching staff
	Appointing at the managerial positions in higher education institutions
	Additional work of teaching staff
Accreditation/issuing permits for private higher education institutions	Initial Accreditation of private higher education institutions
	Reaccreditation and external quality assurance processes

2.6. How to apply Guidance with checklists at the level of national jurisdictions?

CRA Checklists for the Higher Education Sector represent an overview of the most prevalent corruption risks within selected common corruption-prone areas and the most vulnerable processes within these areas in targeted jurisdictions. Also, checklists offer a set of control questions related to the existence/non-existence of measures for mitigating described risks at the systemic and institutional levels. Answers to these questions by stakeholders should assist them in assessing the need for reaction on a systemic or institutional level and implement possible measures to mitigate identified risks. More precisely, if the answer to any individual control question from checklists is *No*, competent stakeholders should consider applying adequate activities that arise from the answer to the question. In addition to answering relevant control questions, to adequately assess external and systemic risk factors, stakeholders that participate in the preparation and adoption of relevant public policies/regulations for the Higher Education Sector should also examine does existing legislation contain any of other regulatory corruption risk factors, elaborated in the CPL Guidance with checklists for this sector. If needed, they should consider initiating/adopting appropriate legislative amendments to mitigate these risk factors.

Checklists could be used primarily by competent ministries, anti-corruption bodies, councils for higher education, bodies for accreditation and quality assurance, and universities, as a reminder during the developing of normative, institutional, organizational or practical reforms or conducting the CRA at the sectoral or institutional level. It should be repeated that checklists can provide only a basic set of questions with the direction into which one should look. One needs to tailor the questions to the specific circumstances and needs to exercise close scrutiny of all details in legislation and practice in every single jurisdiction linked to each question.

3. Checklists

3.1. Area: Students' Exams

Process	Corruption Risk	Questions
<p>Exams Scheduling</p>	<p>Bribery: providing administrative staff with financial or other incentives in exchange for breaching the rules and procedures in exam applications (allowing exams in the time that is more suitable, allow exams application out of deadlines, allow changes in exams applications).</p> <p>Favouritism: giving preferences to students in the exam application process.</p> <p>Trading with information/leaking of information: providing students with the information about exams 'schedule prior to the official information in exchange for different benefits.</p>	<ol style="list-style-type: none"> 1. Is there a system in place for electronic/online exam applications? 2. Does system for electronic exam applications has sufficient security checks to avoid possible misuses (log-in system with unique username and password for each student)? 3. Does system for electronic exam applications has an option to track each change in exam application process and require confirmation of the user for these changes (to avoid that someone else enter the system and change the data)? 4. Is schedule for all exams published at the beginning of each semester? 5. Is every change in exams schedule timely published and timely available to all students (for example, a certain number of days before the exams, with system of notifying students about the change and similar)? 6. Is there a practice to publish the reasons/justification for changes in exams schedule? 7. Is there a system in place to check whether students fulfilled all required precondition to take an exam prior to exam

		<p>application (are all pre-exam obligations fulfilled – seminars, test, required practise and similar)?</p> <p>8. Is a list of students who applied to take an exam published prior to the exam?</p> <p>9. Is there a procedure for submitting a complaint on exam applications/exams schedule?</p> <p>10. Does procedure for submitting complaint contain obligation of producing reports on number, types and outcomes of complaints (statistics on complaints and their outcomes)?</p> <p>11. Are these reports publicly available?</p>
<p>Taking Exams</p>	<p>Bribery: providing teacher with financial or other incentives in exchange for better treatment/better grade on the exam.</p> <p>Conflict of Interest: students and teachers/examiners/other university staff have relations that cause a different conflict of interest circumstances.</p> <p>Abuse of position: usage of teachers' position of power to gain different benefit from students (one of the most common is requirement that students should buy teachers' book if they want to take the exam).</p>	<p>1. Is it prescribed that taking the exam is open for public (or is it forbidden to limit access of the third party to the exams)?</p> <p>2. Is there an obligation to organize exams only if there is a third-party present (or is it forbidden to organize exams if there is only student and teacher present)?</p> <p>3. Is there a procedure to file an objection/complaint if the exam is organized in non-transparent manner (and reschedule/cancel the exam consequently)?</p> <p>4. Is the record of taking the exam made during the exam?</p> <p>5. Is the record of taking the exam signed by student and teacher immediately after the exam?</p>

	<p>Trading with information/leaking of information: providing students with the exams' requirements (questions, topics) prior to the exam in exchange for different benefits.</p> <p>Fraud: cheating during exam. The person offering the opportunity to cheat is an accessory to fraud.</p> <p>Sextortion: extortion of sexual favours in exchange for better grade on the exam.</p>	<p>6. Is records of taking exams with exams' results published immediately after the exam (in the same day)?</p> <p>7. Is there a security system for detecting and preventing online exams' cheating (for example, identification of persons having access to passwords to the answers, mechanisms for preventing hacking and similar)?</p> <p>8. Are there mechanisms for monitoring exams and which type of mechanisms exist (for example, required/sufficient number of personnel that monitor exams, cameras, recoding, live streaming of the exams and similar)?</p> <p>9. Is there a publicly available internal regulation for managing conflict of interest (Col) that is applicable to conflict of interest situations in the process of taking exams (Col of students and teachers/examiners/other university staff)?</p> <p>10. Is there a system for declaring private interests and for further managing situations in which Col exists (institute of exemption)?</p> <p>11. Is there a system for supervision over the implementation of internal procedures/rules on Col?</p> <p>12. Does regulation for managing Col envisage sanctions for violating the rules and which types of sanctions are envisaged?</p>
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		<p>13. Is there a regular training for teachers for raising awareness and for applying rules on Col?</p> <p>14. Is there a publicly available procedure for submitting complaints on exam procedure/results?</p> <p>15. Is there a system for supervision over the implementation of procedure on complaints?</p> <p>16. Is there a whistle-blowing system in place for reporting corruption in exams (reporting corruption through safe channels with elements of whistle-blower's protection procedures)?</p> <p>17. Does whistle-blowing procedure contain obligation of producing reports on number, types and outcomes of whistle-blowers complaints (statistics on whistle-blowers complaints and their outcomes)?</p> <p>18. Are these reports publicly available?</p> <p>19. Is there a policy that recognize and manage sextortion as corruption risks?</p> <p>20. Is there a publicly available policy that addresses sexual harassment?</p> <p>21. Are there any anti-corruption and integrity trainings that include addressing corruption risks in students' exams area?</p>
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		22. Does this training include addressing sextortion as a form of corruption?
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3.2. Area: Students' and Scientific Work

Process	Corruption Risk	Questions
<p>Students' Works (essays, seminars, and other students' written work during the studying as a part of exams)</p>	<p>Fraud: submitting students' works that are written by someone's else (<i>ghost-writing</i>).</p> <p>Plagiarism: use of another's production as one's own without crediting the source/without proper citing (avoiding complying with copyright and intellectual property rules).</p>	<ol style="list-style-type: none"> 1. Is there an obligation for checking/verifying whether submitted works are written by students who submitted them (for example, obligatory oral discussion on submitted written papers that can confirm that student actually wrote the work)? 2. Is there a clear and publicly available procedure for teachers/mentors to do authentication check of submitted students' work? 3. Is there an obligation for teachers/mentors to write a report on submitted students' written work to confirm their authentication and to describe the process of authentication check? 4. Is there an obligation to publish all students' work that are accepted, reviewed and evaluated? 5. Is there a system in place to report a suspicion on fraud and plagiarism in students' work? 6. Is there a clear, publicly available procedure for investigating report when there is a suspicion on fraud and plagiarism in students' work? 7. Is there a system for supervision over the implementation of procedure investigating report when there is a suspicion on fraud and plagiarism in students' works?

		<p>8. Does procedure for investigating report when there is a suspicion on fraud and plagiarism in students' work contain obligation of producing reports on number, types and outcomes of cases (statistics of cases and their outcomes)?</p> <p>9. Are these reports publicly available?</p> <p>10. Is there a whistle-blowing system in place for reporting corruption in students' work (reporting corruption through safe channels with elements of whistle-blower's protection procedures)?</p> <p>11. Is there a tailored training on academic integrity for students and teachers/mentors?</p>
<p>Students' final graduate work, MA, and PhD thesis (students' works required for obtaining a certain level of degree)</p>	<p>Fraud: submitting students' final works that are written by someone else (<i>ghost-writing</i>).</p> <p>Plagiarism: use of another's production as one's own without crediting the source/without proper citing (avoiding complying with copyright and intellectual property rules).</p>	<p>1. Is there a software for plagiarism check in place?</p> <p>2. Is there a clear and publicly available written procedure for use of software for plagiarism check (rulebook, instructions, and similar)?</p> <p>3. Is there an obligation for teachers/mentors to write a report on submitted students' final work to confirm their authentication and to describe the process of authentication check?</p> <p>4. Is there an obligation to publish all students' final works that are accepted, reviewed and evaluated?</p>

		<p>5. Does teachers/mentors' report on authentication check published (during the reviewing the works or once final works are accepted, reviewed and evaluated)?</p> <p>6. Is there a system in place to report a suspicion on fraud and plagiarism in students' final work?</p> <p>7. Is there a clear, publicly available procedure for investigating report when there is a suspicion on fraud and plagiarism in students' final work?</p> <p>8. Is there a system for supervision over the implementation of procedure investigating report when there is a suspicion on fraud and plagiarism in students' final work?</p> <p>9. Does procedure for investigating report when there is a suspicion on fraud and plagiarism in students' final work contain obligation of producing reports on number, types and outcomes of cases (statistics of cases and their outcomes)?</p> <p>10. Are these reports publicly available?</p> <p>11. Is there a whistle-blowing system in place for reporting corruption in final graduate work (reporting corruption through safe channels with elements of whistle-blower's protection procedures)?</p> <p>12. Is there a tailored training on academic integrity for students and teachers/mentors?</p>
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<p>Scientific Work (work of professors/scientists published in journals and usually required for promotion and further career development).</p>	<p>Fraud: submitting scientific' works that are written by someone's else (<i>ghost-writing</i>).</p> <p>Plagiarism: use of another's production as one's own without crediting the source/without proper citing (avoiding complying with copyright and intellectual property rules). different benefits.</p> <p>Conflict of interest: author of the scientific work and reviewer of the work are in conflict of interest</p>	<ol style="list-style-type: none"> 1. Is there a software for scientific works plagiarism check in place? 2. Is there a clear, publicly available written procedure for use of software for scientific works plagiarism check (rulebook, instructions, and similar)? 3. Is there a system for declaring private interests and for further managing situations in which Col between authors and reviewers exists (institute of exemption)? 4. Is there a system for supervision over the implementation of procedures/rules on Col between authors and reviewers? 5. Does regulation for managing Col between authors and reviewers envisage sanctions for violating the rules and which types of sanctions are envisaged? 6. Is there a practice of signing an academic integrity disclaimer both by authors and reviewers that scientific work is original, authentic work? 7. Is an academic integrity disclaimer published with scientific work? 8. Is there a system in place to report a suspicion on fraud and plagiarism in scientific works?
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3.3. Area: Teaching Staff Management

Process	Corruption Risk	Questions
<p>Hiring of the teaching staff</p>	<p>Favouritism – situations of giving unfair preferential treatment to one candidate at the expense of other candidates</p> <p>Nepotism and Cronyism – situations of favouring of relatives or friends because of their relationships rather than because of their qualities.</p> <p>Political Patronage – influence of political parties in the hiring of the teaching staff</p> <p>Bribery - extorting or accepting bribes to influence hiring decisions</p> <p>Sextortion - extortion of sexual favours in exchange for employment</p>	<ol style="list-style-type: none"> 1. Are open positions for teaching staff advertised in advance? 2. Is it possible to hire teaching staff without a competitive process and how are these options limited, well documented, justified, and supervised? 3. Is there clear and publicly available procedure for hiring of the teaching staff? 4. Does procedure for hiring of the teaching staff include clear and detailed criteria for the selection? 5. Do unsuccessful applicants have a possibility for appeal? 6. Is there a system for supervision over the implementation of hiring procedure? 7. Is there a publicly available internal regulation for managing conflict of interest (Col) that is applicable to conflict of interest situations in the process of hiring teaching staff? 8. Is there a system for supervision over the implementation of internal procedures/rules on conflict of interest? 9. Does regulation for managing Col in the process of hiring teaching staff envisage sanctions for violating the rules and which types of sanctions are envisaged?

		<p>10. Is all information kept confidential prior to the selection process?</p> <p>11. Are vacancies filled promptly so that periods during which employees undertake more senior duties are not unduly extended, to the disadvantage of other potential applicants?</p> <p>12. Are details on qualifications of applicants verified with original documentation or certified copies?</p> <p>13. Are reasons documented if applicants were not short-listed or not interviewed?</p> <p>14. Are selection decisions documented and kept on file?</p> <p>15. Are selection decisions available to the public?</p> <p>16. Are decisions on hiring teaching staff subject to regular audits?</p> <p>17. Is there a whistle-blowing system in place for reporting corruption in in the process of hiring teaching staff (reporting corruption through safe channels with elements of whistle-blower's protection procedures)?</p> <p>18. Is there a policy that recognize and manage sextortion as corruption risk?</p> <p>19. Is there a publicly available policy that addresses sexual harassment?</p>
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		<p>20. Are there any anti-corruption and integrity trainings that include addressing corruption risks in the hiring of the teaching staff process?</p> <p>21. Does this training include addressing sextortion as a form of corruption?</p>
<p>Appointing at the managerial positions in higher education institutions – deans, vice deans, and chiefs of departments, etc.²⁹</p>	<p>Political Patronage – situations of rewarding individual professors for political/electoral support</p> <p>Political influence in appointment</p> <p>Nepotism and Cronyism – situations of favouring of relatives or friends because of their relationships rather than because of their qualities.</p> <p>Sextortion - extortion of sexual favours in exchange for appointing at the managerial positions in higher education institutions</p>	<p>1. Are managerial positions in higher education institutions advertised in advance?</p> <p>2. Is there clear and publicly available procedure for appointing at the managerial positions in higher education institution with criteria for appointment?</p> <p>3. Is there a system for supervision over the implementation of procedure for appointing at the managerial positions in higher education institution?</p> <p>4. Is there a publicly available internal regulation for managing conflict of interest (CoI) that is applicable to conflict of interest situations in the process of appointment at the managerial positions in higher education institution?</p> <p>5. Is there a system for supervision over the implementation of internal procedures/rules on conflict of interest?</p>

²⁹ These questions could also be relevant for appointing at the non-managerial positions processes, such as membership in project staff or certain working groups that are remunerated.

		<p>6. Does regulation for managing Col in process of appointment at the managerial positions in higher education institution envisage sanctions for violating the rules and which types of sanctions are envisaged?</p> <p>7. Are decisions on appointments with the explanatory notes available to the public?</p> <p>8. Is there a whistle-blowing system in place for reporting corruption in the process of appointment at the managerial positions in higher education institution (reporting corruption through safe channels with elements of whistle-blower's protection procedures)?</p> <p>9. Is there a policy that recognize and manage sextortion as corruption risk?</p> <p>10. Is there a publicly available policy that addresses sexual harassment?</p> <p>11. Are there any anti-corruption and integrity trainings that include addressing corruption risks in appointing at the managerial positions process?</p> <p>12. Does this training include addressing sextortion as a form of corruption?</p>
<p>Additional work of teaching staff</p>	<p>Absenteeism - not showing up for work in the Higher Education Institution or working fewer than required, while being paid as if full time.</p>	<p>1. Are there clear and publicly available limits and rules in place on additional work of teaching staff?</p>

	<p>Abuse of resources – using sources of the Higher Education institution - equipment, space, etc for other business, friends or personal advantage; using paid time for the same purposes.</p> <p>Conflict of interest</p>	<p>2. Are there clear and publicly available disclosure requirements in place on any additional work of teaching staff, including information on nature of the additional paid or non-paid work for third parties?</p> <p>3. What explicit restriction exists on the use of the higher education institutions’ resources for private purposes/additional work?</p> <p>4. Is there a control mechanism of attendance at work of teaching staff (e.g. by appointing a person to check staff presence, or by using IT systems)?</p> <p>5. Is there a system for supervision over the implementation of rules and limits on additional work of teaching staff?</p> <p>6. Are there publicly available rules for regulating in which cases the professors are holding the regular classes and in which the other teaching staff?</p> <p>7. Does regulation for additional work of teaching staff envisage sanctions for violating the rules and which types of sanctions are envisaged?</p> <p>8. Is there a whistle-blowing system in place for reporting corruption related to the additional work of teaching staff in higher education institutions (reporting corruption through safe channels with elements of whistle-blower’s protection procedures)?</p>
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		<p>9. Is there a Code of Conduct/Rules of Conduct for teaching staff in HE institutions?</p> <p>10. Are there any anti-corruption and integrity trainings that include implementation of the Code of Conduct/Rules of Conduct for teaching staff in HE institutions?</p>
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3.4. Area: Accreditation/issuing permits for private higher education institutions

Process	Corruption Risk	Questions
<p>Initial Accreditation of private higher education institutions³⁰</p>	<p>Political influence in the accreditation process</p> <p>Fraud in the accreditation process</p> <p>Bribing to obtain successful certification or accreditation</p> <p>Conflict of interest of persons involved in the accreditation procedure</p>	<p>1. Is there a clear and publicly available procedure for the initial accreditation of higher education institutions?</p> <p>2. Does the procedure for initial accreditation of higher education institutions include clear and detailed standards/criteria for accreditation following international standards?</p> <p>3. Do standards/criteria for accreditation include the existence of Internal mechanisms for prevention of corruption?</p> <p>4. Do relevant rules for initial accreditations of higher education institutions include a clear division of competences among different bodies and guarantees of independence in the decision-making process following international standards?</p> <p>5. Are there rules that contain clear conditions and criteria for appointment/selection of members of all bodies that participate</p>

³⁰ Questions for initial accreditation are also relevant for reaccreditation and external quality assurance processes.

		<p>in the initial accreditation of higher education institutions, including heads of institutions competent for accreditation, reviewers that assess the fulfilment of standards, etc?</p> <p>6. Do unsuccessful applicants for initial accreditation have a possibility for appeal?</p> <p>7. Is there a system for supervision over the implementation of a procedure for initial accreditation?</p> <p>8. Is there a publicly available regulation for managing conflict of interest (CoI) for all persons involved in assessing the fulfilment of standards and deciding on initial accreditation of higher education institutions?</p> <p>9. Does regulation for managing CoI in process of initial accreditation of higher education institutions envisage sanctions for violating the rules and which types of sanctions are envisaged?</p> <p>10. Is there a system for supervision over the implementation of procedures/rules on conflict of interest?</p> <p>11. Are information on the selection of the reviewers that assess the fulfilment of standards for the initial accreditation of higher education institutions available to the public?</p> <p>12. Is there tailored training for reviewers on assessing standards for the initial accreditation of higher education institutions in practice?</p>
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		channels with elements of whistle-blower's protection procedures)?
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