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| **CORRUPTION RISKS ARISING FROM UNIVERSITY MANAGEMENT** | | | |
| **Corruption risks** | **How to identify**  **(External indicators)** | **What to check?**  **(monitoring objects)** | **How to minimize?**  **(anti-corruption measures)** |
|  | 1. Absence of a budget committee or a similar collegial body in the university that approves the budget (or its nominal nature). 2. Absence (or nominal nature) of a specific and functioning procedure for the formation and review of budget requests. 3. Absence of protocols for final decisions on the approval of specific budget items. 4. Lack of established channels for informing departments about the outcomes of budget request review. 5. Frequent reallocation of funds between different budget items. 6. Non-transparent distribution of overhead expenses. | 1. Existence of a collegial body approving the university budget. 2. Degree of involvement of leaders and representatives of structural departments in budget discussions and final decision-making (composition of the collegial body). 3. Format and procedure for budget discussions and approval (in-person, remote, online; quorum; decision-making procedure - secret/open voting; voting rights of all meeting participants; presence of a "casting vote," etc.). 4. Degree of justification for the exclusion or approval of specific budget items. 5. Existence of minutes of budget committee (or other budget-related collegial body) meetings and documented final decisions. 6. Adherence to the procedure for familiarizing structural departments with the approved budget. 7. Transparency in the expenditure of budgetary funds and the ability of each department to control its own budget. 8. Existing mechanisms for reporting on the use of allocated budgets | 1. Collegial review and approval of the budget. 2. Horizontal management of budgetary funds (providing operational autonomy to departments within the allocated budget). 3. Implementation of robust reporting mechanisms for the use of budgetary funds. 4. Control of the effectiveness of budgetary fund utilization with mandatory presentation and evaluation of achieved results. |
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| **Non-transparent budget formation and distribution in the University** |
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| **Misuse of assets and main funds** | 1. A large number of rental spaces withdrawn from the academic facilities. 2. Leasing laboratory facilities and training grounds to third-party organizations for commercial activities. 3. A significant number of events hosted by external organizations on the university premises. 4. Leasing or providing free use of residential areas of the university (staff apartments, dormitory rooms) to third parties. 5. Leasing or providing free use of university vehicles to third parties and external organizations | 1. Production and economic contracts of the university, with particular attention to lease and gratuitous use agreements. 2. Actual inventory of academic facilities (excluding rented spaces) compared to the current student body. 3. Schedule to identify the utilization of classrooms, sports halls/courts, laboratories, and practical training grounds in the educational process. 4. Rental schedule compared to the academic timetable to identify discrepancies and obstacles for the smooth organization of the educational process. 5. Number of residential premises owned by the university. 6. Applications received for housing provision to identify the presence of housing shortages and unmet needs for student and staff accommodation. 7. Lists of individuals actually residing in university housing compared to lists of staff and students to identify residential premises assigned to third parties (permissible only if the housing needs of students and staff are fully met). 8. Lists of vehicles owned by the university and lease agreements for those vehicles to assess their compliance with intended use. 9. Materials on the university website and the Internet to determine the number of events organized by external organizations held on the university premises and their impact on the educational process. | 1. Transparent procedure for planning the revenue part of the budget by utilizing fixed assets. 2. Rental of classrooms only after scheduling and commencement of the educational process (using unused classrooms). 3. Rental of sports halls/courts/facilities, laboratories, and practical training grounds only during non-academic hours (when there are no educational activities). 4. Transparent procedure for the allocation of residential premises, with the leasing of housing units only after publishing information on the university website regarding the availability of vacant spaces and in the absence of corresponding applications. 5. Annual report on the utilization of assets and fixed assets. 6. Annual external and internal audit of the utilization of assets and fixed assets. |

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|  | 1. Regular engagement of the same suppliers.  2. Lack of clear selection criteria for suppliers.  3. Absence of a transparent procurement planning procedure.  4. Systematic implementation of unplanned procurements.  5. Procurement of works and services similar to those performed by university teachers and staff.  6. Procurement of goods, works, and services at prices higher than the average market rates (without sufficient justification).  7. Inappropriate selection of the method of government procurement (competitive bidding, single-source procurement, etc.). | 1. Planned and actual expenditure part of the budget.  2. Existence and effectiveness of the procurement planning procedure.  3. List and cost of procurements of goods, works, and services from external organizations in the reporting period.  4. Price proposals from various suppliers for each procurement (the absence of such proposals is also a corruptive factor as it indicates a lack of prior market research).  5. Average market cost of similar goods, works, and services (through monitoring and analysis of offerings on the Internet and in the media).  6. Documentation of conducted government procurements (for state universities), correctness and justification of the choice of procurement method in each specific case.  7. Duplication of procured works and services that duplicate the functions of university departments or individual staff members. |  |
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|  | 1. Implementation of a transparent procurement planning procedure within the approval of the budget committee for the expenditure part of the budget.  2. Setting limits for unplanned procurements.  3. Mandatory request for price proposals and justification by the initiating department for the selection of specific suppliers (submitted to the budget committee or another competent body of the university).  4. Annual report on the effectiveness of budget expenditure in the university.  5. Annual internal audit of the efficiency of budget expenditure in the university. |
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| **Non-transparent procurement procedure of goods, works, and services.** |
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| **Non-transparent procedure for hiring and promoting employees.** | 1. Sole decision-making authority for hiring/promoting employees by the university's top management or the head of a department/ departmental unit. 2. Lack of clear criteria for eligibility for specific positions within the university and qualification requirements for candidates. 3. Absence of a transparent procedure for personnel selection and decision-making regarding other personnel matters. | 1. Orders regarding new employee hires, transfers, or appointments to new positions during the reporting period. 2. Qualification requirements for these positions and criteria for candidate selection. 3. Alignment of appointed individuals with the stated requirements and criteria. 4. Degree of employee awareness of available vacancies (through examination of the university's website or other notification systems). 5. Decision-making procedure for hiring/appointing specific candidates (including the presence of minutes from collective discussions, orders, candidate dossiers, etc.). | 1. Collegial decision-making on the selection of personnel for vacant positions. 2. Transparent procedure for recruiting candidates for vacant positions, allowing the participation of all interested candidates. 3. Competitive selection of candidates for any vacant positions (except for junior technical staff). |

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| **CORRUPTION RISKS ARISING FROM THE ACADEMIC NATURE OF UNIVERSITIES.** | | | |
| **Corruption risks** | **How to identify (External indicators)** | **What to check?**  **(monitoring objects)** | **How to minimize? (anti-corruption measures)** |
|  | 1. Admission of applicants without the Unified National Testing (UNT) or Comprehensive Testing Certificate (CTC) (for bachelor's degree programs); without a language proficiency test certificate; without a specialty test certificate (for master's and doctoral degree programs).  2. Admission of applicants who have not achieved the minimum passing score in the National Testing (UNT, CTC, master's/doctoral testing).  3. Violation of the established deadlines for admitting applicants.. | 1. Applicants' personal files during the reporting period to determine the presence of necessary certificates, their conformity to the document submission date, and the minimum threshold score for admission.  2. Applicants' admission requests to the university to ensure their compliance with the designated period for applicant intake.  3. Admission orders in the university (compliance with established deadlines and procedures for enrollment into the student body). | 1. Internal audit of applicant documents upon the completion of the admissions committee's work.  2. Transparent reporting procedure to the authorized education authority.  3. Digitalization of the admissions process and integration of the database of admitted students/graduates/doctoral candidates and individuals who have achieved the threshold score during testing at the National Testing Center.. |
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| **Violations of the established procedure for admitting applicants.** |
| **Non-compliance with the established procedure for allocating vacant scholarships.** | 1. Lack of announcement about the availability of vacant scholarships on the university website. 2. Insufficient awareness among students about the opportunity to receive vacant scholarships (social networks, messengers, information systems, and other communication channels with students are not utilized). 3. Absence of a procedure for submitting and reviewing applications for the award of vacant scholarships. 4. Individual or formally collective decision-making regarding the distribution of vacant scholarships. | 1. The university website and other communication channels with students (social networks, messengers, information systems, etc.) for the presence and timeliness of relevant notifications. 2. Reasonable timeframe for providing necessary documents, sufficient for gathering a complete package. 3. Protocols of decisions made by collegial bodies of the universities and documents from interested candidates. 4. Results of student surveys on their level of awareness about the availability of vacant scholarships and the accessibility of participating in the competition. | 1. Verification by the authorized body of compliance with the condition of timely informing of students upon submission of documents. |

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| **Non-transparent procedure of dormitory room allocation.** | 1. Lack of clear selection criteria for applicants. 2. Failure to consider the order of application submissions. 3. Non-compliance with the collegial decision-making process for assigning dormitory rooms. 4. Non-transparent procedure for allocating vacant (vacated) rooms in the dormitory. | 1. The university's website and other communication channels with students (social networks, messengers, information systems, etc.) in terms of the presence and timely posting of announcements about dormitory room allocation. 2. Documents that formalize the decision to allocate dormitory rooms to specific students (orders, minutes of the relevant collegial body meetings). 3. Lists of students and staff residing in the dormitory compared to the orders and minutes of room allocation (to identify any individuals who were assigned rooms outside the established procedure). | 1. Establishing a limit for accommodating students/staff and learners. 2. Defining priority categories for dormitory room allocation and publishing the corresponding list. 3. Determining and publishing the grounds for eviction from the dormitory. 4. Collegial decision-making on dormitory room allocation/eviction. 5. Digitizing the process of receiving and processing applications from students and staff. |
| **Violations during the current monitoring of students' academic performance.** | 1. Absence or inadequate attendance monitoring; 2. Lack of clearly defined procedures for assigning, changing, and reviewing grades; 3. Overemphasis on oral assessments; 4. Absence of mechanisms for monitoring teaching quality and student assessment; 5. Lack of institutional analysis in the university. | 1. Electronic teacher's journal to ensure timely recording of absences and current grades; 2. Selective analysis of logs from the university's information system to identify instances of grade modification, absence addition/deletion outside the established procedure; 3. Most common forms of assessment activities; 4. Established procedures for evaluating and assessing teaching quality; 5. Analytics based on reporting periods and the outcomes of teaching specific disciplines; 6. Selective analysis of a student's academic performance across different disciplines to identify significant patterns. | 1. Strict competitive selection of teachers; 2. Stringent attendance control with immediate (same day) recording of absences in the electronic journal; 3. Systematic reconciliation of absence data with actual student presence within the university premises (entry-exit tracking); 4. Predominance of written forms of assessment; 5. Regular cross-blind review of student works by other subject-specific teachers; 6. Analysis of current academic performance in specific disciplines among different teachers, identifying and investigating reasons for deviations; 7. Well-regulated procedure for assigning grades and making changes in the electronic journal; 8. Enhancing objective motivation among students to identify cases of academic corruption and dishonesty; 9. Semester-wise student surveys/questionnaires. |
| **Violations during the intermediate monitoring of academic performance (examination session).** | 1. Absence of established procedures for the development and storage of examination materials; 2. Unjustifiably wide range of individuals having access to examination materials; 3. Lack of clearly defined procedures for conducting examinations; 4. Absence of blind grading and encryption of works; 5. Sole administration of oral exams; 6. Lack of analysis of examination results (deviation from the Bell Curve); 7. Duplication of responsibilities for work verification and assigning examination grades; 8. Prevalence of oral exams over written exams; 9. Absence of a clear procedure for appealing examination results; 10. Existence and prevalence of test-based knowledge assessment in subjects. | 1. Internal documents regulating the procedures for developing examination materials and conducting exams; 2. Protocol for the storage of examination materials; 3. Ratio of oral and written exams; 4. Examination records indicating clear deviations from the Bell Curve; 5. Selective examination of written exam papers (including encrypted or open grading); 6. Selective review of appeal protocols; 7. Analysis of student survey results; 8. Implementation of special information security procedures for test development, ensuring confidentiality and autonomy in the creation, storage, and transmission of materials; 9. List of administrative rights for test management system, mechanisms for generating final records, transferring grades to transcripts, and ensuring autonomy and security of the software. | 1. Restriction of access to examination materials to a limited group of individuals;  2. Reduction of the time frame for developing examination tasks;  3. Dominance of written exams and open-book format exams;  4. Abandonment of testing as a form of final assessment for the discipline\*;  5. Committee-based administration of oral exams;  6. Systematic analysis of examination results, studying deviations;  7. Elimination of duplicated responsibilities for assigning final grades for the discipline;  8. Blind grading and encryption of written papers;  9. Regular cross-blind review of examination papers by other subject-specific teachers;  10. Transparent appeal procedure;  11. Increasing objective motivation among students to identify cases of academic corruption and dishonesty;  12. Semester-wise student surveys/questionnaires.  \*If educational institutions are obliged to use the test format, they should ensure the following conditions:  - Isolation of the test development area (only local server with no external access, removal of all ports and media, constant video recording of the development process, assigned personnel, access registration to the premises, prohibition of using external media - only printed versions after inspection);  - Implementation of a two-stage blind review of developed tests, identifying obviously easy or template questions;  - Continuous updating of the test question bank;  - Visual and technical monitoring of the test-taking process (tracking login logs, response logs, timing of answers, behavior at the computer);  - Detailed and diversified methodology for test composition (situational, verifying, control), utilizing branching, adaptiveness, etc. |

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| **Non-transparent procedure of final assessment (state examinations).** | 1. Lack of involvement of employers; 2. Absence of written exams with blind grading; 3. Testing based solely within the university; 4. Provision of preferences to members of the certification committee (meals, gifts, etc.); 5. Absence of audio and video recording of the examination process and the work of the certification committee; 6. Lack of a transparent appeals procedure; 7. Significant disparities between students' ongoing academic performance and the results of the final assessment. | 1. Internal documents regulating the procedure of students' final assessment; 2. Composition of the certification committee to identify external members and employers' representation; 3. Protocols of the certification committee's work; 4. Audio and video recordings materials; 5. Examination papers to detect blind grading and encryption; 6. Results of the final assessment and ongoing academic performance of specific students to identify significant discrepancies and their justifications; 7. Survey results from students regarding the organization of the final assessment (fees, gifts, etc.); 8. Survey of external members of the certification committee to determine compliance with established procedures; 9. Appeal protocols. | 1. Maximum involvement of employers in the composition of certification committees; 2. Assignment of specific exams to be conducted by employers; 3. Shift in the format of final exams towards assessing specific skills; 4. Video and audio recording of the proceedings of certification committees; 5. Blind grading and encryption of written works; 6. Separate grading of works by members of the certification committee; 7. Restricted access to examination materials; 8. Systematic analysis of the results of the final assessment in comparison to students' ongoing academic performance; 9. Surveying students to assess the objectivity of the final assessment; 10. Surveying external members of certification committees and employer representatives. |

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| **Hired performers of academic work.** | 1. Absence of comprehensive plagiarism checks on all written academic works; 2. Lack of a procedure for oral defense of written academic works; 3. Significant discrepancy in the quality between in-class written works and works prepared outside the classroom. | 1. Reports on plagiarism checks of academic works (the absence of which is a corruptive factor); 2. Random selection of individual student works for simultaneous plagiarism checks; 3. Examination of university social media accounts to identify hired performers and intermediaries; 4. Survey results from students regarding this issue. | 1. Universal plagiarism check of student works; 2. Oral defense of completed written works; 3. Monitoring of social media platforms to identify intermediaries and hired performers; 4. Implementation of legal accountability for hired performers of academic works. |
| **Translation: Falsification of academic documents (certificate, transcript).** | 1. Direct contact between service recipients and responsible individuals issuing academic documents; 2. Excessively wide range of individuals with access to edit transcripts in the information system (only 1-2 individuals would be sufficient); 3. Lack of systematic reconciliation between the transcript and primary records of final grades for disciplines (examination records). | 1. Internal university orders regarding admission, transfer, and graduation of students in comparison with issued certificates and transcripts; 2. Primary records of final grades (examination records) compared to transcripts of specific students (blind sample); 3. Logs of all manual (non-automatic) changes made to student transcripts during the reporting period.. | 1. Minimization (or preferably, elimination) of direct contacts between service recipients and immediate performers; 2. Systematic reconciliation of examination records with student transcripts; 3. Automation of transcript generation; 4. Systematic reconciliation of logs for changes made to transcripts in the information system; 5. Development and utilization of additional software to track the quantity of grade amendments made within a single access session. |

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| **Non-transparent utilization of grants for scientific research.** | 1. Lack of planned research outcomes; 2. Absence of plagiarism checks on completed research; 3. Involvement of not all declared experts; 4. Lack of clear distribution of responsibilities among research team members; 5. Publication of research results in predatory journals; 6. Lack of project visibility within and beyond the university. | 1. Grant proposal, research plan, and planned outcomes; 2. Project implementation schedule; 3. Actual work performed and achieved results; 4. Reports on plagiarism checks of completed research; 5. List of publications where the main research results are published, compared with a list of predatory journals; 6. Selective analysis of the scientific credibility of publications where the research is published; 7. Media and internet materials about the research; 8. Comparison of the value of achieved results with the allocated funding amount; 9. Actual expenses for the research implementation (salaries of experts, who exactly, all members of the research team, etc.). | 1. Systematic monitoring of research results by the funding agency; 2. Rejection of publication in predatory journals; 3. Mandatory plagiarism reports with justification of the conclusion of its absence/presence (abandoning the use of a formal uniqueness percentage indicator); 4. Control of fulfilling the obligation to disseminate the conducted research in the media and on the Internet; 5. Monitoring the systematic involvement of all declared members of the research team in project work. |

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| **Lack of accountability for academic dishonesty.** | 1. Absence of an internal document within the university that regulates the responsibility of staff and students for academic dishonesty. 2. Lack of mechanisms to control academic integrity. 3. Absence of mechanisms to hold individuals accountable for academic dishonesty. 4. Absence of adverse consequences for individuals who engage in academic dishonesty. | 1. Internal documents regulating the responsibility for academic dishonesty. 2. Existence/absence of a body authorized to investigate cases of academic misconduct (disciplinary committee, ethics committee, etc.). 3. Regulations and powers of such a body. 4. Real-life cases of accountability for academic dishonesty. 5. Adverse consequences specified and actually incurred for academic dishonesty. | 1. Implementation of an independent body, separate from the university administration, authorized to investigate cases of academic dishonesty. 2. Implementation of restrictions on access to certain academic privileges for individuals involved in academic dishonesty (academic mobility, scholarships, grants, research funding, awards, categories, bonuses, etc.). 3. Transparent procedure for holding individuals accountable for academic dishonesty. |