КЕНЖЕГАЛИ САГАДИЕВ АТЫНДАҒЫ ХАЛЫҚАРАЛЫҚ БИЗНЕС УНИВЕРСИТЕТІ

KENZHEGALI SAGADIYEV UNIVERSITY OF INTERNATIONAL BUSINESS, UIB

PROGRAMME (STRATEGY)

FOR COUNTERING CORRUPTION

"KENZHEGALI SAGADIEV UNIVERSITY OF INTERNATIONAL BUSINESS" LLP

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EDITION 3

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CONTENTS

Document Passport

Document Type	Organisational documentation
Document Title	Anti-Corruption Programme (Strategy)
Document Purpose	The Programme sets out the core aims and tasks, as well as the specific directions for implementing the University's anti-corruption policy. It also establishes a mandatory standard of conduct for every member of staff, regardless of position, and for every student as a participant in the educational process.
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Original Document Holder	Quality Assurance Centre (QAC)

Approval sheet

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1. Scope of application

1.1 Настоящая Программа (Стратегия) противодействия коррупции (Далее – Программа) определяет основные цели и задачи, конкретные направления по реализации политики противодействия коррупции в ТОО «Университет международного бизнеса имени Кенжегали Сагадиева» (далее – Университет или УМБ), а также устанавливает обязательную модель поведения для каждого сотрудника, независимо от занимаемой должности, и студента как участника образовательного процесса. This Anti-Corruption Programme (hereinafter – the Programme) sets out the core aims and objectives, as well as the specific directions for implementing the anti-corruption policy of *Kenzhegali Sagadiyev University of International Business* LLP (hereinafter – the University or UIB). It also establishes a mandatory standard of conduct for every employee, regardless of their position, and for every student as a participant in the educational process.

1.2 Combating corruption in the Republic of Kazakhstan is one of the key priorities of state policy. It encompasses a number of directions aimed at further strengthening anti-corruption measures, including fostering an environment of intolerance towards any manifestations of corruption within society.

The mission of Kenzhegali Sagadiyev University of International Business is: "To generate knowledge and train sought-after, successful professionals equipped with modern competencies and capable of making a meaningful impact on Kazakhstan's socio-economic development in a rapidly changing world." In line with this mission, the University cultivates an innovative scientific and educational environment grounded in strong academic traditions. This environment supports the work of a highly qualified community engaged in fundamental and applied research for the benefit of society, while also ensuring the provision of high-quality educational services and student support in accordance with international standards.

UIB places priority on respecting the individual and ensuring equality; on the quality of graduate training; on the academic freedom and responsibility of academic staff, employees, and students; on the reliability of scientific results; on ethical conduct and *zero tolerance for corruption*; on collegial decision-making; on openness, transparency, and trust; on social responsibility; and on both flexibility and clarity.

UIB declares zero tolerance for any form of corruption and will not tolerate conduct by its employees that involves using their official position for improper or unlawful gain for themselves, their relatives, or any other persons, nor will it tolerate behaviour that encourages such practices among colleagues. By promoting intolerance towards corruption, the University contributes to fulfilling the key objectives of the educational process and supporting the implementation of state policy in the Republic of Kazakhstan.

Continuing its proactive approach to shaping and strengthening an anti-corruption mindset and behaviour among students and staff, and in order to ensure informational transparency and accessibility of educational services, UIB has developed this

Programme (Strategy) to establish systematic conditions for preventing and countering corruption.

2. Regulatory references

This Anti-Corruption Programme includes references to the following:

2.1 The Constitution of the Republic of Kazakhstan (adopted by national referendum on 30 August 1995) (as amended and supplemented as of 19.09.2022)

2.2 Law of the Republic of Kazakhstan No. 410-V of 18 November 2015 "On Combating Corruption" (as amended and supplemented as of 05.01.2023)

2.3 Order of the Acting Minister of Education and Science of the Republic of Kazakhstan No. 587 dated 10 December 2021

2.4 Criminal Code of the Republic of Kazakhstan No. 226-V ZRK of 3 July 2014 (as amended and supplemented as of 01.01.2023)

2.6 Code of the Republic of Kazakhstan on Administrative Offences No. 235-V of 5 July 2014 (as amended and supplemented as of 07.01.2023)

2.7 Regulations on the Disciplinary Committee of the UIB Academic Council, Protocol No. 6 dated 30.12.21

3. General provisions

3.1 The University identifies as its priorities: a high professional and educational standard, high-quality training, spiritual and moral values, patriotism, and intellectual and cultural development.

3.2 The University's leadership and staff deem any form of corruption, corrupt behaviour, fraud, bribery, as well as any preconditions for their emergence, to be unacceptable and intolerable.

3.3 The University strictly adheres to the overall strategy, goals, and objectives of its institutional policy, recognising the educational and character-building process as an essential component of a unified and continuous educational system.

3.4 In its activities, the University is guided by the Constitution of the Republic of Kazakhstan and the Laws of the Republic of Kazakhstan, including "On Education" and "On Combating Corruption", as well as the Code of the Republic of Kazakhstan on Administrative Offences.

3.5 In accordance with the laws of the Republic of Kazakhstan, the University undertakes appropriate measures to ensure academic integrity, prevent corruption-related violations, and counteract them when they arise.

3.6 The University reviews any reports, with full confidentiality, concerning actions by faculty members, students (undergraduates/master's/doctoral students), or employees that are not permitted by law, regardless of their position or past achievements.

3.7 The University declares zero tolerance for any form of corruption and will not tolerate conduct by its employees whereby they use their official position to obtain improper or unlawful gain for themselves, their relatives, or any other persons, nor

behaviour that encourages such practices among colleagues. By promoting intolerance of corruption, the University contributes to achieving the key objectives of the educational process and supporting the implementation of state policy in the Republic of Kazakhstan.

3.8 Continuing its active policy of fostering and developing an anti-corruption mindset and behaviour among students and staff, and in order to ensure transparency and accessibility of educational services, the University has developed this Programme to establish systematic conditions for preventing and countering corruption.

4. Terms and definitions

4.1The following terms are used in this Programme:

Term	Definition
Corruption (from Latin corruptio — bribery)	Unlawful activity involving the use of one's official or professional authority to obtain illicit personal and/or financial gain.
Countering corruption	A coordinated effort by state authorities, local government bodies, civil society institutions, organisations, and individuals aimed at preventing corruption, prosecuting those who commit corruption-related offences, and minimising and/or eliminating their consequences.
Corruption-related offence	A specific act of corruption that entails disciplinary, administrative, criminal, or other forms of liability.
Anti-corruption policy	A scientifically grounded, consistent, and systematic activity carried out by state institutions and civil society aimed at preventing and reducing the negative impact of corruption, as well as eliminating the causes and conditions that facilitate its occurrence.
Subjects of anti-corruption policy	State and local government bodies, institutions, organisations, and individuals authorised to develop and implement anti-corruption measures, as well as citizens.
The subjects of anti-corruption policy at UIB are:	– administrative and managerial staff; – academic staff; – teaching and support staff, employees; – students, master's and doctoral candidates, and learners enrolled in MDA and DBA programmes; – individuals and legal entities with an interest in the provision of high-quality educational services.
Prevention of corruption	Activities undertaken by the subjects of anti-corruption policy aimed at identifying, analysing, limiting, or eliminating phenomena and conditions that give rise to corruption-related offences or facilitate their spread.
Subjects of corruption-related offences	Individuals who misuse their status contrary to the lawful interests of society and the state in order to obtain illicit benefits, as well as those who unlawfully provide such benefits.
Symbols and abbreviations	

The following abbreviations are used in this Programme:

UIB – University of International Business

УМБ – Университет международного бизнеса

MES RK – Ministry of Education and Science of the Republic of Kazakhstan

AMS – Administrative and Managerial Staff

AS – Academic Staff

TMA – Teaching and Methodological Activities (for UMR — Teaching and Methodological Work)

The following acts are recognised as academic misconduct (academic dishonesty):

- plagiarism – the intentional or negligent, full or partial unlawful use, appropriation, or disposal of protected results of another person's work, including academic, scientific, research, journalistic, or analytical output, accompanied by presenting false information to others about oneself as the genuine author;

- cheating – dishonest behaviour by a student or employee involving the copying of another person's intellectual work;

- duplication – submitting the same work for different assessments or requirements, including attempting to present, in whole or in part, previously graded work from another course as one's own without prior permission from academic staff, even if the student is the original author;

- falsification – forging academic records or other documents; fabricating data (such as observations in a scientific experiment, records, or survey results); forging a signature in academic work; intentionally altering, tampering with, or damaging academic work;

- concealment – withholding or hiding information about the dishonest inclusion of fabricated data in academic work; substituting research or experimental data and results; presenting false information obtained during the research process;

- collusion – an agreement between participants in the educational process to complete any academic work subject to verification and assessment on behalf of another student.

5. Core principles of academic integrity

5.1 The core principles of academic integrity include:

– Integrity – the honest and conscientious completion by students of both assessed and non-assessed academic tasks;

– Protection of the rights of authors and their successors – recognising authorship and safeguarding works protected by copyright, achieved through accurate representation of others' words and ideas and proper citation of sources in assessed work;

– Openness – transparency, mutual trust, and open exchange of information and ideas between students and academic staff;

– Respect for the rights and freedoms of students – including the right to freely express opinions and ideas;

– Equality – each student ensures compliance with the rules of academic integrity and bears equal responsibility for violations;

– Responsibility of every member of staff for carrying out their professional duties in a manner that contributes, among other things, to eliminating conditions that give rise to corruption in any form;

– Direct responsibility of heads of structural units for violations of anti-corruption principles within their respective units, which may include removal from post or dismissal;

– Honesty and impartiality of heads of structural units in their professional activities and in evaluating colleagues and students, maintaining independence from undue influence when performing official duties, preventing breaches of professional ethics by others, and avoiding such breaches themselves.

6. Objectives of the Anti-Corruption Programme

6.1 The objectives of this Programme are to:

– promote the adoption and strengthening of measures aimed at the effective and efficient prevention of corruption within the education system;

– create a moral, psychological, and ethical climate within the University that supports the eradication, rejection, condemnation, and denunciation of any form of corruption as a threat to the University's reputation and to the successful implementation of its long-term development strategy;

– ensure transparency and openness in the work of committees and structural units responsible for delivering the University's key strategic plans;

– inform staff and provide them with up-to-date information on the anti-corruption policy implemented by the University;

– encourage and support any lawful activity aimed at preventing and combating corruption, including measures to identify the causes and conditions that contribute to corrupt behaviour;

– promote integrity, honesty, responsibility, and proper conduct among all subjects of anti-corruption policy at UIB.

7. Academic staff, employees, and students of UIB are required to:

7.1 Academic staff, employees, and students of UIB are required to:

– familiarise themselves with and strictly comply with the provisions of the University's Anti-Corruption Programme;

– observe all legislative and regulatory requirements of the Republic of Kazakhstan relating to bribery and corruption, and follow the internal procedures established by the University to prevent legal violations;

– adhere to the principles of anti-corruption, avoiding and preventing any payments or actions that may lead to the misuse of official duties, and refraining from deriving personal benefit from professional or partnership relationships;

– refrain from abusing their position or authority to obtain any form of reward, including money, gifts, and other benefits. Gifts may be regarded as bribery (gifts from official organisations may be accepted only if of low monetary value, e.g., as a token award; gifts of significant value from official organisations must be placed into University custody as University property, and University leadership must be notified of any valuable personal gifts);

– note that the University guarantees protection for employees against unauthorised actions by officials if they refuse to participate in corrupt transactions or agreements, or if they report actual or potential corruption-related activities.

8. Organisation of the integration of academic integrity principles into the learning process using the tools of the Academic Integrity League

8.1 In organising the implementation of academic integrity principles within the learning process through the use of Academic Integrity League tools, the following measures are carried out:

8.1.1 Monitoring the procedure for free personal registration of students, including the option to preview the course, provided that UIB's requirements for course enrolment capacity are met;

8.1.2 Monitoring procedures for proctoring and citation of academic work;

8.1.3 Familiarising students with the course syllabus and the academic and non-academic requirements specified therein;

8.1.4 Applying formative and summative assessment criteria for interim assessment as outlined in the course syllabus and provided to the student in advance. Students must be given the opportunity to appeal assessment criteria that were applied without prior notification;

8.1.5 Electronic procedures for the admission and registration of applicants;

8.1.6 Allowing students to individually choose courses, timetables, and instructors, provided that UIB requirements regarding the number of registered students are observed;

8.1.7 Tabulated procedures and mechanisms for credit transfer upon submission of verified transcripts from other higher education institutions, secondary or vocational institutions, or MOOC certificates from a list recommended by higher education institutions;

8.1.8 Providing educational support to students who demonstrate a deeper interest in study or research, as well as to those facing academic difficulties or low motivation, including support for individuals with special educational needs;

8.1.9 Implementing mechanisms for social and psychological support for students, assisting with work placement organisation and job search, and helping students balance study, work, and personal life;

8.1.10 Ensuring student access to learning materials, infrastructure, and documents related to their academic and non-academic life;

8.1.11 Ensuring logical sequencing of courses and reflecting international best practices in curricula and learning programmes, taking into account the balance of core higher education knowledge, key competency development, intellectual and academic skills, evolving societal requirements, and the degree of academic choice available to students;

8.1.12 Integrating components into educational programmes that prepare students for professional activity, taking into account mechanisms for cooperation with the corporate and/or industrial sectors;

8.1.13 Establishing procedures and mechanisms for recording learning outcomes, academic and non-academic rewards, and disciplinary measures in student transcripts;

8.1.14 Monitoring the inclusion of the module "Foundations of Law and Anti-Corruption Culture" in the list of educational programmes;

8.1.15 Creating and broadcasting "Integrity Hour" video lectures to foster anti-corruption culture among students;

8.1.16 Updating lists of student thesis topics to include anti-corruption themes relevant to their educational programmes;

8.1.17 Organising the activities of the student clubs "Sanaly Urpaq".

9. Preventive measures during the monitoring of academic performance of UIB students

9.1 Preventive measures applied during the monitoring of academic performance at UIB include:

9.1.1 Timely recording of student absences and current grades in the electronic gradebook;

9.1.2 Selective analysis of the UIB information system to identify cases of entering/changing marks or adding/removing absences outside established procedures;

9.1.3 Procedures for reviewing and evaluating the quality of teaching for each discipline on a semester basis;

9.1.4 Selective analysis of an individual student's performance across different disciplines to identify significant discrepancies;

9.1.5 Development of internal documents regulating procedures for developing examination materials and administering examinations;

9.1.6 Analysis of the effectiveness of assessment methods used to evaluate student learning outcomes;

9.1.7 Selective review of written examination papers (coded or openly checked);

9.1.8 Selective review of appeal protocols;

9.1.9 Analysis of student satisfaction index results;

9.1.10 Procedures for the information security of test development tools, ensuring confidentiality and independence in the creation, storage, and transmission of tests;

9..1.11 Determination of administrative access rights within the testing system, mechanisms for forming final grade sheets, transferring grades into transcripts, and ensuring the autonomy and security of the software;

9.1.12 Audio and video recording of the state final attestation process;

9.1.13 Coding and objective evaluation of students' examination papers;

9.1.14 Analysis of final attestation results and a student's current academic performance to identify sharp discrepancies and assess their justification;

9.1.15 Analysis of student survey results regarding the organisation of final attestation (e.g., extortion, purchase of gifts, etc.);

9.1.16 Interviews with external members of the attestation commission to determine adherence to established procedures;

9.1.17 Monitoring the state of academic integrity at UIB through sociological surveys among students and academic staff to assess levels of corruption within the institution, carried out by the Anti-Corruption Compliance Service and the UIB QAC.

10. Preventive measures relating to students' academic work

10.1 Preventive measures relating to students' academic work include:

− Preparing reports on plagiarism checks of academic work (the absence of such reports is considered a corruption risk factor);

− Reviewing selected student papers (blind sampling with simultaneous plagiarism checking);

− Monitoring UIB's social media accounts to identify hired writers and intermediaries;

− Analysing student survey results on this issue.

11. Measures to prevent the falsification of UIB academic documents

11.1 Measures to prevent the falsification of UIB academic documents include:
– Monitoring the issuance of orders on student admission, transfer, and graduation, comparing them with issued certificates and transcripts;
– Verifying final grades (examination grade sheets) against the transcripts of individual students (blind sampling).

12. Measures to ensure adherence to academic integrity principles in the use of UIB research grant funding

12.1 Measures to ensure adherence to academic integrity principles in the use of UIB research grant funding include:
– Checking completed research works for plagiarism;
– Conducting selective analysis of the academic credibility of the publications in which research findings are published;
– Ensuring that the value of achieved results corresponds appropriately to the amount of allocated funding.

13. Measures to ensure compliance with academic integrity principles in the recruitment and advancement of UIB staff

13.1 Measures to ensure compliance with academic integrity principles in the recruitment and advancement of UIB staff include:
– Issuing orders on employment, transfer, or appointment of staff to new positions in accordance with qualification requirements and candidate selection criteria;
– Using competitive and merit-based selection mechanisms for academic staff, and ensuring transparency in these procedures;
– Applying rules for evaluating staff performance and determining remuneration (KPI system);
– Informing employees about available vacancies (through the approved notification systems).

14. Measures to ensure compliance with academic integrity principles in the admission of UIB applicants

14.1 Measures to ensure compliance with academic integrity principles in the admission of UIB applicants include:
– Reviewing applicants' personal files to ensure the presence of required certificates, their validity as of the date of submission, and compliance with the minimum admission threshold score;
– Checking applicants' admission applications to ensure that submission dates fall within the established admission period;

− Issuing the order on admission to UIB, ensuring compliance with the established timelines and procedures for enrolling students.

15. Measures to ensure compliance with academic integrity principles in the allocation of UIB vacant educational grants

15.1 Measures to ensure compliance with academic integrity principles in the allocation of UIB vacant educational grants include:

− Timely notification of applicants about available vacant educational grants via the UIB website and other communication channels used to reach students (social media, messaging platforms, information systems, etc.);

− Setting a reasonable deadline for submitting required documents, allowing sufficient time for applicants to gather a complete package;

− Preparing decision protocols of UIB's collegial bodies and collecting documentation from candidates who have expressed interest;

− Conducting student surveys to assess their level of awareness regarding available vacant grants and the accessibility of participation in the competition;

− Implementing and confirming compliance with the anti-corruption standard ISO 37001 or ST RK 3049.

16. Implementation of the Anti-Corruption Programme

16.1 The Anti-Corruption Programme applies to the University's leadership, the entire academic staff, all employees, students, and any individuals engaged in joint activities within the University.

16.2 The Anti-Corruption Programme adheres to the procedural legislative and regulatory documents and provisions governing the University's activities.

16.3 UIB prohibits employees or individuals acting on its behalf from offering monetary rewards or gifts to government officials or any third parties for the purpose of facilitating the unauthorised advancement of certain interests, as well as from exerting moral or physical pressure on persons who have reported corruption-related incidents, corrupt behaviour, or conditions that may foster corruption within the University community.

16.4 Expenses related to hosting foreign colleagues or officials must be reasonable, proportionate, aligned with established financial guidelines, and duly recorded.

16.5 Charitable financial expenditures must be carried out in accordance with legislation and recorded in financial reports and relevant documentation.

16.6 The step-by-step implementation of the Programme's provisions is carried out through the development of an Action Plan for implementing this Programme at the University level.

16.7 A necessary condition for achieving the Programme's objectives is internal and external monitoring. Internal monitoring and evaluation will be conducted by the direct implementer of the relevant activity, while external monitoring will be performed by a specially designated working group.

17. Monitoring and analysis of anti-corruption activities at UIB

17.1 An essential component of anti-corruption activities at UIB is the continuous internal recording, monitoring, and analysis of the educational process and other areas of University operations.

17.2 The University conducts monitoring of anti-corruption efforts and analyses the effectiveness of anti-corruption policy implementation. This includes internal audits to ensure compliance with intra-University procedural norms as a measure to prevent and counter corruption, as well as external audits carried out with the involvement of authorised certification agencies.

17.3 The successful implementation of UIB's Development Programme (Strategy), alongside its educational, scientific, and extracurricular activities, requires effective financial and administrative support.

17.4 For the implementation of anti-corruption policy in the financial and administrative sphere, internal financial control must be ensured. Its main purpose is to verify the accuracy of accounting records and reporting, and to ensure compliance with the legislation of the Republic of Kazakhstan governing financial and administrative activities.

17.5 The internal control system is designed to ensure the timely preparation of accurate financial statements, prevent errors and misstatements, and ensure clear and full execution of orders and directives issued by UIB leadership.

17.6 Timely, accurate, and consistent adherence to internal financial control procedures will contribute to preventing corruption and developing appropriate recommendations to avoid potential errors, thereby fostering an anti-corruption mindset.

18. Expected outcomes of the Programme's implementation

As a result of implementing this Anti-Corruption Programme, the following outcomes are expected:

– identification of trends in the development of corruption forms through integrated analysis of data on corruption perception among staff, academic personnel, and students;

– effective functioning and full implementation of anti-corruption legislation and standards to support the eradication of corruption within the University;

– transparency and ethical conduct in UIB's operations, along with increased awareness among University leadership regarding corruption risks;

− joint anti-corruption efforts by University leadership and staff, fostering a unified institutional stance against corruption.