

**Analytical report  
on the results of internal analysis of corruption risks  
in the activities of the non-commercial joint stock company  
«Abylkas Saginov Karaganda technical university»  
for the period from 01.01.2023 to 31.12.2023.**

**Karaganda**

**April 29, 2024**

An internal analysis of corruption risks in the activities of the non-profit joint-stock company «Abylkas Saginov Karaganda technical university» was carried out in accordance with the law of the Republic of Kazakhstan dated November 18, 2015 No. 410-5 LRK «On Combating Corruption», model rules for conducting an internal analysis of corruption risks, approved by order chairman of the agency of the Republic of Kazakhstan for civil service affairs and anti-corruption dated October 19, 2016 No. 12 and methodological recommendations for conducting internal analysis of corruption risks approved by the order of the chairman of the agency of the Republic of Kazakhstan for anti-corruption (anti-corruption service) dated December 30, 2022 No. 488 (hereinafter referred to as methodological recommendations).

**Name of the object of internal analysis of corruption risks:**

Non-profit joint-stock company «Abylkas Saginov Karaganda technical university» (hereinafter referred to as the company).

**The basis for conducting an internal analysis of corruption risks:**

Temporary order chairman of the board-rector of the company «On conducting anti-corruption monitoring and analysis of corruption risks» No. 219 dated March 26, 2024 (Appendix 1).

**Analyzed period:**

12 months from 01/01/2023 to 12/31/2023

**Internal analysis of corruption risks was carried out in the following areas:**

- 1) identification of corruption risks in internal regulatory documents affecting activities societies;
- 2) identification of corruption risks in organizational and managerial activities society.

The company carries out its activities in accordance with the charter, as well as internal regulatory documents (rules, instructions, regulations, regulations on structural divisions, etc.).

During the analysis, the charter and internal regulatory documents regulating the activities of the company were studied (Appendix 2).

### ***1. Personnel management, including the definition of positions, exposed to corruption risks***

A list of positions subject to corruption risks has been compiled, which, in accordance with paragraph 32 of the methodological recommendations, without analyzing functional responsibilities, includes positions performing organizational and administrative or administrative functions in society and other positions exposed to corruption risks, for which corruption-prone functions were detailed based on official responsibilities (Appendix 3).

Analysis of NLA and business processes in the area of personnel management showed the need for:

- updating some provisions on structural divisions (changes in staff, regulations, tasks, responsibilities) and some job descriptions (changes in responsibilities);
- staffing the center for sustainable development.

Corruption risks in NLA and business processes in the area of personnel management have not been identified.

### ***2. Resolution of conflicts of interest***

Corruption risks in NLA and business processes related to resolving conflicts of interest have not been identified.

### ***3. Provision of public services***

Corruption risks NLA and business processes in the provision of public services have not been identified.

### ***4. Implementation of permitting functions***

- name of corruption risk in NLA, business processes: lack of an approved procedure for publishing educational and scientific literature;

- description of corruption risk: the rules for the preparation and execution of educational and scientific literature do not contain a complete procedure for publishing educational and scientific literature and the deadlines for the development of publications, which creates the risk of lobbying the interests of some authors, to the detriment of other authors;

- recommendations for its elimination: the head of the ERD, by May 31, 2024, make changes and additions to the rules for the preparation and execution of educational and scientific literature, describing in detail the procedure for publishing educational and scientific literature, indicating each stage and the deadline for completing the stage.

### ***5. Implementation of control and audit functions***

Corruption risks in legal acts and business processes related to the implementation of control and audit functions have not been identified.

## ***6. Development and distribution of budgetary and financial resources***

- the name of the corruption risk in legal regulations and business processes: untimely submission by deans of data on the movement of students;

- description of corruption risk: scholarships are paid by the Financial Center. To implement this process, information about grant recipients, their academic achievements, type of scholarship, as well as information confirming membership in certain categories (disabled people, orphans, students on academic leave, etc.) is uploaded from the university's internal system to the Unified Portal higher and postgraduate education (EHEA). Then, based on the data provided, the Financial center transfers scholarships to students' bank accounts after receiving monthly reports from the university.

A number of problems have been identified that affect both the efficiency of the scholarship process and the reputation of the university. The main problems are related to deans' late submission of student movement data, which leads to errors in reports, including information about students who have already been expelled or do not qualify for scholarships;

- recommendations for its elimination: member of the board - vice-rector for academic affairs to strengthen control over the timely submission by deans of data on the movement of students.

## ***7. Conclusion of agreements with individuals and legal entities***

1. Name of corruption risk in legal acts and business processes: absence of penalties for the counterparty in KazMIRD contracts;

- description of corruption risk: the company's contracts, where the contractor is the structural unit of the Kazakhstan multidisciplinary institute for reconstruction and development (KazMIRD), do not provide for penalties for failure to fulfill obligations under the contract; this creates a high risk of delay in payment for the execution of the contract. And on the part of the director of KazMIRD, there is a risk of lobbying the interests of the counterparty, not transferring documents for a long time to collect the debt in court;

- recommendations for its elimination: The Director of KazMIRD should add penalties to the counterparty in the KazMIRD agreements in case of violation of contractual obligations. Member of the board - vice-rector for research to establish control over the implementation of the rules of electronic document Management of the company in terms of the approval of KazMIRD contracts.

2. Name of corruption risk in legal regulations and business processes: untimely filing of a claim against a counterparty for violations of contractual obligations;

- description of corruption risk: in the company's contracts, where KazMIRD is the contractor, it is revealed that KazMIRD does not timely carry out work on preparing materials and collecting debts under contracts in court;

- recommendations for its elimination: member of the board - vice-rector for research to establish control over the timely preparation of materials and timely filing of claims against the counterparty for violations of contractual obligations.

### ***8. Development and operation of information systems***

- name of corruption risk in NLA, business processes: lack of audit of information systems.

- description of corruption risk: lack of audit of information systems may lead to concealment of vulnerabilities in the security system of information systems, the level of security of information systems, including application software and databases.

- recommendations for its elimination: the SD director should conduct an audit of the company's information systems by October 1, 2024.

### ***9. Other issues arising from organizational and managerial activities***

- name of the corruption risk in legal regulations, business processes: lack of publication of annual financial statements and audit reports on the Company's corporate Internet resource;

- description of corruption risk: in accordance with clause 142 of the company's charter, the company's annual financial statements and audit reports must be published on the company's corporate internet resource. Failure to comply with this requirement entails risks arising from the direction of ensuring transparency and publicity of activities;

- recommendations for eliminating it: by June 1, 2024, publish the annual financial statements and audit reports for 2023 on the company's corporate internet resource. Entrust control over execution to the chief accountant.