



«APPROVED»

Rector of «SKMA» JSC

J. Seitzhanova

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ANTI-CORRUPTION STANDARD
JSC “SOUTH KAZAKHSTAN MEDICAL ACADEMY”

ST 24 - 2026

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Shymkent

ONTUSTIK-QAZAQSTAN MEDISINA AKADEMIASY «Оңтүстік Қазақстан медицина академиясы» АҚ		 SOUTH KAZAKHSTAN MEDICAL ACADEMY АО «Южно-Казахстанская медицинская академия»
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1. REGULATORY REFERENCES

This Standard has been developed taking into account the requirements of the regulatory legal acts of the Republic of Kazakhstan and the internal regulatory documents of South Kazakhstan Medical Academy (hereinafter — the **Academy**).

- Constitution of the Republic of Kazakhstan.
- Law of the Republic of Kazakhstan No. 319-III dated 27 July 2007 “On Education”.
- Law of the Republic of Kazakhstan No. 410-V ZRK dated 18 November 2015 “On Countering Corruption”.
- Labour Code of the Republic of Kazakhstan No. 414-V ZRK dated 23 November 2015 — with regard to labour relations, disciplinary liability, recruitment, transfer, dismissal and other matters of human resources policy.
- Order No. 174 of the Minister of Education and Science of the Republic of Kazakhstan dated 4 May 2020 “On Approval of the Anti-Corruption Standard for Ensuring Openness and Transparency in Organizations of Higher and/or Postgraduate Education”. This document serves as a direct basis for the development of this internal Standard.
- Order No. 2 of the Minister of Science and Higher Education of the Republic of Kazakhstan dated 20 July 2022 “On Approval of State Compulsory Standards of Higher and Postgraduate Education”, registered with the Ministry of Justice of the Republic of Kazakhstan under No. 28916, as subsequently amended and supplemented.
- Other regulatory legal acts of the Republic of Kazakhstan governing higher and postgraduate education, academic integrity, assessment of learning outcomes, labour relations and countering corruption.
- Local regulatory documents of South Kazakhstan Medical Academy governing the educational process, academic integrity, internal labour regulations, assessment, appeal procedures, human resources policy and the activities of the Compliance Service.

2. TERMS, DEFINITIONS, DESIGNATIONS AND ABBREVIATIONS

2.1. The following basic terms and definitions are used in this Standard:

Academic Integrity — a set of principles and rules of conduct for participants in the educational process aimed at ensuring good faith, objectivity and reliability of learning outcomes.

Academic Misconduct — an act or omission by a student or an Academy employee that violates established rules of the educational process, academic integrity or objective assessment.

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Anti-Corruption Activities — activities of the Academy aimed at preventing, identifying and suppressing corruption and corruption risks.

Anti-Corruption Standard — this Internal Anti-Corruption Standard of South Kazakhstan Medical Academy.

Corruption Risk — the possibility of circumstances and conditions arising that may facilitate the commission of corruption offences.

Corrupt Practice — an act or omission that has characteristics of a corruption offence or creates conditions conducive to corruption.

Conflict of Interest — a situation in which an employee's personal interest may affect the objective performance of their official duties.

Personal Interest — the possibility for an employee or persons associated with the employee to obtain a material or other benefit as a result of making or failing to make a particular decision.

Student — a person enrolled in an educational programme at the Academy, including students, interns, residents, master's students and doctoral students.

Academic and Teaching Staff (ATS) — persons engaged in teaching and/or academic and teaching activities at the Academy.

Assessment — the process of determining a student's level of knowledge, skills and competencies in accordance with established criteria.

Educational Process — the process of teaching and education aimed at enabling students to complete educational programmes and acquire the relevant competencies.

Improper Benefit — money, gifts, services, property or other advantages provided or received for the purpose of influencing a decision or obtaining an unjustified advantage.

Gift — property, service or other benefit provided free of charge or on terms different from ordinary terms where its receipt may be associated with the performance of official or academic duties.

Appeal — a procedure established by the Academy for reviewing an assessment result or other decision within the educational process.

Compliance Service — a structural unit or responsible person of the Academy performing functions related to the prevention and identification of corruption risks, provision of advice and monitoring compliance with anti-corruption requirements.

Corruption Report — information concerning an alleged or established fact of corruption, a corruption risk or a violation of anti-corruption requirements.

Academy — South Kazakhstan Medical Academy.

OSCE — Objective Structured Clinical Examination.

ATS — Academic and Teaching Staff.

Standard — Internal Anti-Corruption Standard of South Kazakhstan Medical Academy.

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Order No. 174 — Order No. 174 of the Minister of Education and Science of the Republic of Kazakhstan dated 4 May 2020 “On Approval of the Anti-Corruption Standard for Ensuring Openness and Transparency in Organizations of Higher and/or Postgraduate Education”.

2.2. Terms not defined in this Standard shall be applied in the meanings established by the legislation of the Republic of Kazakhstan and the internal regulatory documents of the Academy.

3. GENERAL PROVISIONS

3.1. This Internal Anti-Corruption Standard of the Academy (hereinafter — the **Standard**) establishes mandatory rules of conduct and procedures for preventing, prohibiting, identifying and suppressing corruption in the educational process and other related processes of the Academy.

3.2. This Standard has been developed and is applied for the purpose of fostering academic integrity among the employees, Academic and Teaching Staff and students of the Academy.

3.3. The Standard is aimed at ensuring:

- objectivity of assessment;
- equality of students, employees and Academic and Teaching Staff;
- academic integrity;
- transparency of educational procedures;
- prevention of bribery and unlawful remuneration;
- prevention of conflicts of interest;
- elimination of informal influence on learning outcomes;
- protection of persons who report violations in good faith;
- personal accountability of participants in the educational process.

3.4. The Standard has been developed taking into account the Anti-Corruption Standard for Ensuring Openness and Transparency in Organizations of Higher and/or Postgraduate Education approved by Order No. 174 of the Minister of Education and Science of the Republic of Kazakhstan dated 4 May 2020 (hereinafter — **Order No. 174**).

3.5. The Standard shall be applied together with the legislation of the Republic of Kazakhstan, the Charter of the Academy, Academic Policy, Code of Academic Integrity, Internal Regulations, employment contracts and other internal acts of the Academy.

4. SCOPE OF THE STANDARD

4.1. The Standard is mandatory for:

- the Rector and Vice-Rectors;

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- Deans and Deputy Deans;
- Heads of Departments;
- heads of educational programmes;
- Academic and Teaching Staff;
- employees of units involved in organizing the educational process;
- members of examination, attestation, appeal and other commissions;
- employees of units responsible for ensuring the quality of education;
- employees who have access to academic and assessment data;
- employees of clinical departments and clinical sites insofar as they are involved in the educational process;
- students;
- master’s students, doctoral students, residents, interns and other persons undergoing education or training;
- other persons participating in the educational and other processes of the Academy.

5. FUNDAMENTAL PRINCIPLE OF THE EDUCATIONAL PROCESS

5.1. Any attempt to obtain an advantage in the educational process through money, gifts, services, personal connections, pressure, threats, mediation or other improper means shall be regarded as a corruption risk and shall be subject to appropriate action.

5.2. The following arrangements are prohibited:

- receiving a grade in exchange for money;
- passing a course or obtaining academic credit in exchange for a gift;
- changing an examination result;
- obtaining unauthorized admission or access;
- altering attendance records;
- resolving an issue through senior management by improper means;
- obtaining any other unjustified advantage.

6. PARTICIPANTS IN THE EDUCATIONAL PROCESS AND THEIR ANTI-CORRUPTION DUTIES

6.1. A student shall:

- complete academic assignments independently;
- provide accurate information;
- refrain from using prohibited materials;
- not provide other persons with their answers, academic work or account credentials;

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- not purchase completed academic assignments;
- not offer a lecturer money, gifts, services or other benefits;
- not ask other persons to exert influence on a lecturer;
- not exert pressure on a lecturer or commission members;
- report known facts of corruption;
- comply with the principles of academic integrity.
- 6.2. Academic and Teaching Staff shall:
- assess knowledge and skills objectively;
- apply criteria established in advance;
- neither demand nor accept unlawful remuneration;
- not create artificial obstacles for students;
- not use assessment as a means of pressure;
- not alter results without an established and legitimate basis;
- not discriminate;
- disclose conflicts of interest;
- maintain the confidentiality of examination materials;
- inform students about assessment criteria;
- report attempts to exert corrupt influence.

7. ANTI-CORRUPTION OBLIGATIONS OF ACADEMIC AND TEACHING STAFF

7.1. Upon employment, Academic and Teaching Staff shall familiarize themselves with this Standard, the Code of Academic Integrity, Academic Policy, assessment rules and procedures for reporting corruption-related violations.

7.2. Academic and Teaching Staff shall undertake:

“I undertake to perform my professional duties in good faith, objectively and impartially; not to demand or accept money, gifts, services or other benefits in exchange for changing learning outcomes; not to provide unlawful preferential treatment to individual students; to comply with the principles of academic integrity; and to immediately report any attempts to exert corrupt influence.”

8. ANTI-CORRUPTION OBLIGATIONS OF STUDENTS

8.1. Upon enrolment, each student shall familiarize themselves with this Standard and the Code of Academic Integrity.

8.2. A student shall undertake:

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“I undertake to comply with the principles of academic integrity, complete academic work independently, not use corrupt methods to obtain grades or other advantages, not offer or transfer money, gifts, services or other benefits to lecturers or other Academy employees, and report any known facts of corruption and academic misconduct.”

8.3. The fact of familiarization shall be recorded in an electronic system or in paper form.

9. ACADEMIC INTEGRITY AS AN ANTI-CORRUPTION MECHANISM

9.1. Academic integrity is one of the principal mechanisms for preventing corruption in the educational process.

9.2. The following are prohibited at the Academy:

- plagiarism;
- cheating;
- use of cheat sheets;
- use of unauthorized electronic devices;
- buying or selling academic work;
- impersonation of another student;
- sharing login credentials and passwords;
- falsification of results;
- fabrication of data;
- falsification of medical and clinical training data;
- unauthorized use of examination materials;
- interference with electronic assessment systems;
- collusion in completing individual assignments;
- presenting another person’s work as one’s own;
- other violations of the principles of academic integrity.

10. ACADEMIC INTEGRITY OF ACADEMIC AND TEACHING STAFF

10.1. A lecturer shall:

- not provide examination answers in advance;
- not change assessment criteria without an established basis;
- not accept work completed by another person;
- not assist a student in circumventing control or monitoring systems;
- not conceal an established violation of academic integrity;
- not use their official position to alter learning outcomes;
- not commit other violations of the principles of academic integrity.

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10.2. A lecturer shall not require a student to purchase educational materials, services, consultations or other benefits from the lecturer or persons associated with the lecturer as a condition for receiving a passing or positive grade.

11. TRANSPARENCY OF ASSESSMENT

11.1. Before the beginning of a course, students shall have access to:

- the syllabus;
- learning objectives;
- learning outcomes;
- assessment criteria;
- types of assessment and control;
- examination procedures;
- procedures for determining the final grade;
- appeal procedures;
- consequences of violations of academic integrity.

11.2. Any change to material assessment conditions after the beginning of an academic period shall be permitted only in accordance with the established procedure and subject to mandatory notification of students.

12. CONFLICT OF INTEREST IN ASSESSMENT

12.1. A lecturer shall not participate in the assessment of a student where circumstances exist that may affect the lecturer's objectivity.

12.2. Where a conflict of interest arises, the following procedure shall apply:
identify → disclose → refrain from assessment → appoint a replacement → continue the procedure.

13. GIFTS AND UNLAWFUL REMUNERATION

13.1. Academic and Teaching Staff and Academy employees are prohibited from accepting money, gifts, services or other benefits from students or their representatives where such benefits are related to the performance of official duties or intended to obtain an advantage.

13.2. Procedure for Academic and Teaching Staff when offered a bribe:
offer of money/gift → refusal to accept → documentation of the circumstances → report to the supervisor and/or Compliance Service → registration of the report → assessment of the situation → measures in accordance with the law.

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14. PROCEDURE FOR STUDENTS IN CASES OF EXTORTION

If a lecturer demands money, a gift or a service in exchange for a grade, the student:

- is not required to agree;
- is not required to provide the requested benefit;
- where possible, documents the circumstances;
- contacts the Academy's Compliance Officer;
- participates in the review of the circumstances where necessary;
- has the right to protection against retaliation.

15. PROHIBITION OF MEDIATION

15.1. The use of third parties to transfer improper remuneration is prohibited.

15.2. A group leader, student activist, another lecturer, Academy employee, relative or acquaintance may not act as an intermediary for:

- obtaining grades;
- transferring money;
- making arrangements concerning an examination;
- changing results;
- unlawfully resolving academic matters;
- making any other decision contrary to anti-corruption principles.

15.3. A group leader performs official communication between the group and the lecturer and shall not act as an intermediary in matters involving grades, money, gifts or other benefits.

15.4. A group leader shall not collect money or gifts for lecturers and/or employees.

16. CORRUPTION RISKS IN EXAMINATIONS AND VIOLATIONS OF ACADEMIC INTEGRITY

16.1. The following constitute increased corruption risks and violations of academic integrity:

- examination assignments disclosed in advance;
- providing assistance to individual students;
- changing results;
- unjustified opportunities to retake an assessment;
- admission without established grounds;
- pressure on commission members;
- transfer of examination materials;

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- use of technical devices for cheating;
- alteration of electronic records;
- purchasing an examination result;
- giving or receiving money in exchange for a grade;
- organizing a corruption scheme;
- substitution of another person for a student during an examination;
- falsification of results;
- unlawful alteration of an electronic grade;
- sale of examination answers;
- repeated material violation;
- pressure on or threats against a lecturer;
- falsification of clinical training results;
- falsification of practical skills assessment results;
- falsification of documents confirming fulfillment of academic requirements;
- other actions contrary to the principles of this Standard.

16.2. A decision on a violation of academic integrity shall be made taking into account the available evidence, explanations provided by the parties and the circumstances of the violation.

16.3. A person who has a conflict of interest shall not make a final decision alone on a matter in which that person has a personal interest.

17. MEASURES APPLICABLE TO STUDENTS

17.1. Depending on the nature and severity of the violation, measures provided for by legislation and the internal documents of the Academy may be applied to a student.

17.2. Such measures may include:

- disciplinary measures (warning, reprimand, severe reprimand);
- annulment of the result of an assignment or assessment;
- repetition of the relevant procedure where established by the applicable rules;
- expulsion;
- other measures permitted under the legislation of the Republic of Kazakhstan.

17.3. Expulsion shall not be applied automatically without compliance with the established procedure for reviewing the violation and formalizing the relevant decision.

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18. OSCE AND PRACTICAL SKILLS

18.1. In order to reduce corruption risks during an OSCE, the following shall be ensured:

- mandatory audio and video recording of the OSCE;
- standardized stations;
- approved assessment criteria;
- uniform checklists;
- student identification;
- independence of examiners;
- absence of conflicts of interest;
- documentation of results;
- an appeal procedure;
- secure storage of examination materials.

19. LIABILITY OF ACADEMIC AND TEACHING STAFF AND EMPLOYEES

19.1. An employee who violates this Standard may be held liable in accordance with the legislation of the Republic of Kazakhstan and the internal acts of the Academy.

19.2. Possible liability measures shall be applied in accordance with the procedure established by law.

19.3. Termination of an employment contract shall be permitted only where there is a lawful ground for termination and the established procedure has been followed.

19.4. This Standard does not establish an independent ground for dismissal that is not provided for by law.

19.5. Procedure for holding an employee liable:

report of violation → registration → preliminary review → documentation of circumstances → request for written explanation → review of evidence → legal assessment → determination of liability measure → formalization of the decision → notification of the employee → right to appeal.

20. DEPARTMENTS, DEAN'S OFFICE, REGISTRAR'S OFFICE / RECORDS UNITS

20.1. The Head of a Department and the Dean shall:

- ensure uniform rules for students;
- monitor the objectivity of the educational process;
- not unlawfully interfere with lecturers' grades;

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– respond to reports of corruption and notify management and the Compliance Service;

- ensure replacement of a lecturer in the event of a conflict of interest;
- prevent pressure on whistleblowers;
- inform management of significant corruption risks;
- ensure transparency of the educational process while complying with academic integrity and anti-corruption requirements.

20.2. No person may require Academic and Teaching Staff to change an objective assessment of a student without an established and legitimate basis.

20.3. Decisions on academic matters without an established procedure and documented grounds are not permitted.

20.4. Employees of the Registrar’s Office and other units having access to grades shall:

- ensure the accuracy of data;
- not alter information without an established basis;
- record all changes;
- ensure appropriate access controls;
- not share passwords;
- not provide information to persons without the relevant authority;
- refrain from any other actions contrary to the principles of countering corruption and academic integrity.

- Any change to a grade must have:

a legal/administrative basis → a responsible person → date → supporting document → audit trail.

20.5. When transferring to and/or being reinstated at the Academy, documented facts of a student’s involvement in violations of anti-corruption requirements and the principles of academic integrity shall be taken into consideration. Where such violations have been confirmed, the Academy reserves the right to refuse the student’s transfer and/or reinstatement in accordance with the legislation of the Republic of Kazakhstan and/or the Academy’s internal regulatory documents.

21. APPEALS

21.1. A student has the right to appeal an assessment result in accordance with the procedure established by the Academy.

21.2. An appeal shall be considered collectively, objectively and independently, without a conflict of interest.

21.3. A lecturer whose actions are the subject of an appeal shall not make the final decision on the complaint concerning their own actions alone.

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22. PROTECTION OF WHISTLEBLOWERS

22.1. The Academy shall ensure protection and, where necessary, confidentiality or anonymity of persons who in good faith report corruption or violations of academic integrity.

22.2. The following actions against a whistleblower are prohibited:

- threats;
- pressure;
- retaliation or harassment;
- unjustified reduction of grades;
- unjustified changes to academic or work duties or workload;
- discrimination;
- other retaliatory measures for making a good-faith report.

23. REPORTING CHANNELS

23.1. The Academy shall establish official reporting channels, including:

- an electronic reporting form;
- an official email address: **anticorruption@skma.kz**;
- a hotline: **8 (7252) 39-42-83**;
- personal обращения to the Compliance Service;
- written submissions;
- a physical “Trust Box”;
- other official reporting channels.

23.2. Information about reporting channels shall be published on the official website of the Academy and in locations accessible to students.

24. COLLECTIVE RESPONSIBILITY FOR CORRUPTION SCHEMES

24.1. Where several persons participate in a corruption scheme, the role of each participant shall be established and their liability assessed individually.

24.2. An organizer, intermediary and direct participant shall not automatically be subject to the same measure of liability.

24.3. In cases of repeated violations of academic integrity, previously established violations and measures applied shall be taken into account in accordance with the legislation and internal documents of the Academy.

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25. ANTI-CORRUPTION REQUIREMENTS IN HUMAN RESOURCES POLICY

25.1. The Academy's human resources policy is based on the principles of legality, professionalism, objectivity, equal opportunity, transparency and prevention of conflicts of interest.

25.2. During recruitment, appointment, transfer, promotion, formation of the personnel reserve, allocation of teaching workload and awarding of bonuses, the provision of unjustified advantages and the receipt of money, gifts, services or other benefits are prohibited.

25.3. Personnel decisions shall be made on the basis of professional qualities, qualifications, work performance and established criteria, rather than family, personal or other non-official relationships.

25.4. A person who has a conflict of interest in making a personnel decision shall disclose it and refrain from participating in the relevant decision.

25.5. Academic and Teaching Staff and Academy employees undertake not to use their official position for personal interests, to comply with anti-corruption requirements and to report corruption to management and/or the Compliance Service.

25.6. Violations of anti-corruption requirements shall result in liability measures in accordance with the legislation of the Republic of Kazakhstan and the internal acts of the Academy, including disciplinary measures and termination of an employment contract where there are statutory grounds for such termination.

26. PRINCIPLE OF EQUALITY

26.1. In the educational process of the Academy, individual exceptions shall not be granted on the basis of:

- a personal request;
- acquaintance or personal connections;
- family relationship;
- status;
- position;
- informal arrangement;
- an oral instruction that has not been formally documented in accordance with the established procedure.

26.2. Any exception must have:

a lawful basis → a competent authority → a documented decision.

26.3. In the educational process, all students shall be placed on equal terms in:

- current assessment;
- interim assessment;
- final assessment;

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- OSCE;
- practical skills assessment;
- practical training;
- review of academic debts;
- appeals.

26.4. Special conditions may be provided only where there is a basis established by legislation or the internal documents of the Academy.

27. USE OF ARTIFICIAL INTELLIGENCE

27.1. The Academy permits the use of artificial intelligence (AI) technologies in educational, research and administrative activities, subject to compliance with the legislation of the Republic of Kazakhstan and the principles of academic integrity, good faith, transparency and anti-corruption requirements.

27.2. The use of AI shall not create corruption risks, including the possibility of obtaining unjustified advantages, manipulating results, concealing conflicts of interest, making biased decisions, falsifying documents or other information, or circumventing established procedures.

27.3. Employees and students of the Academy shall critically evaluate results generated with the use of AI, verify their accuracy and shall be responsible for the content and consequences of their use.

27.4. When completing academic and research work, AI may be used only to the extent permitted by the relevant rules of the Academy. Presenting results fully or partially generated by AI as independently produced work without disclosing the use of AI constitutes a violation of the principles of academic integrity.

27.5. The use of AI for plagiarism, fabrication or falsification of data, research results, sources or references, as well as for circumventing knowledge assessment requirements or other academic procedures, is prohibited.

27.6. When decisions are made with the use of AI, objectivity, transparency and human oversight shall be ensured, taking into account the principles of academic integrity and the anti-corruption policy. Responsibility for a decision, even where AI was used in its preparation, shall rest with the authorized person who makes the decision.

27.7. The use of AI at the Academy shall contribute to improving the quality of education, research and management while ensuring the prevention of corruption, protection of academic integrity and preservation of trust in the results of the Academy's activities.

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28. FINAL PROVISIONS

28.1. This Standard is a mandatory internal document of the Academy.

28.2. All internal regulatory documents governing the educational process shall comply with the principles of this Standard.

28.3. In the event of any conflict between this Standard and the legislation of the Republic of Kazakhstan, the provisions of the legislation of the Republic of Kazakhstan shall prevail.

28.4. The provisions of this Standard shall be updated in the event of changes to the legislation of the Republic of Kazakhstan or the identification of new corruption risks.

28.5. This Standard has been developed in Kazakh, Russian and English, each version having equal legal force.

28.6. This Standard shall be communicated to the Academic and Teaching Staff, employees and students.

28.7. The text of the Standard shall be published on the Academy's official website to the extent that it does not contain information with restricted access.

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