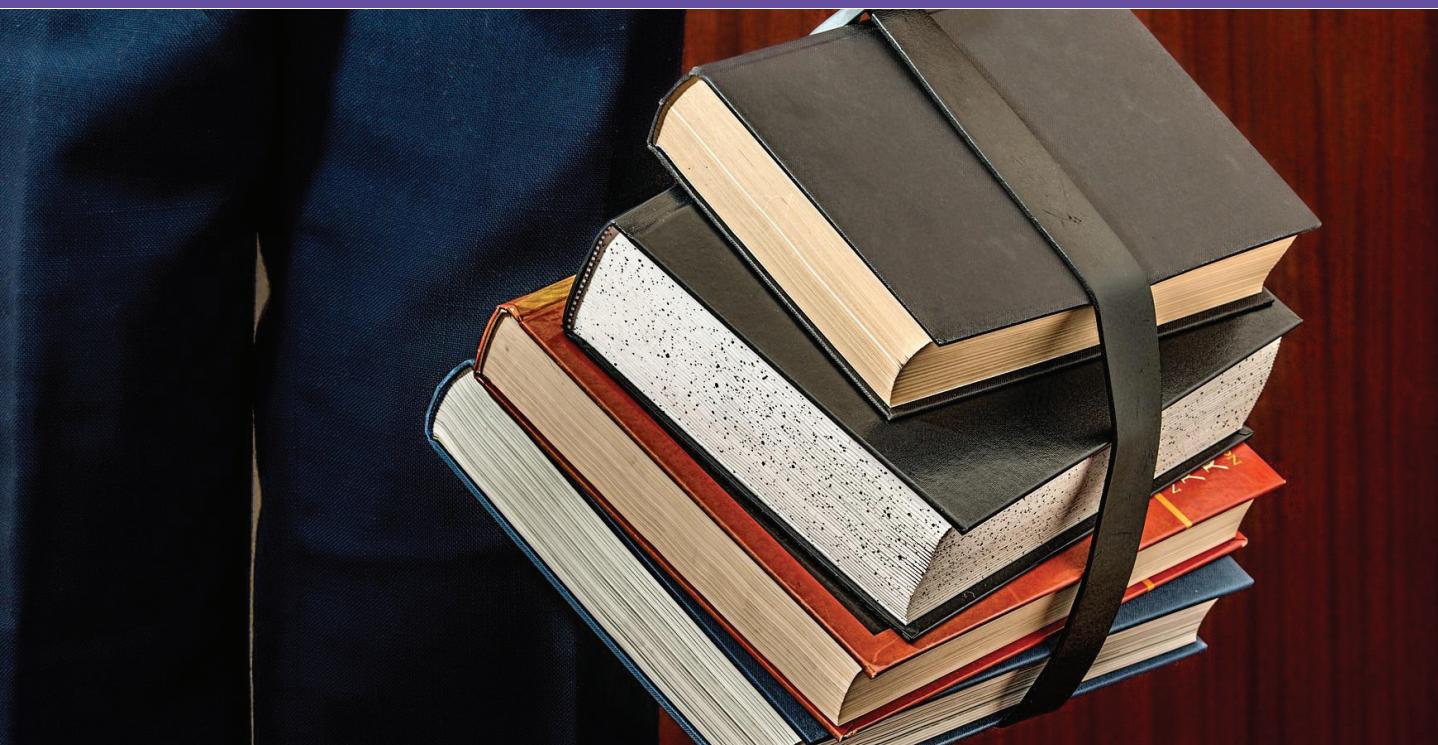


# **ANALYSIS OF THE QUALITY ASSURANCE SYSTEM IN HIGHER EDUCATION AND THE LAW ON ACADEMIC INTEGRITY**

## **ANALIZA SISTEMA OBEZBJEĐENJA KVALITETA U VISOKOM OBRAZOVANJU I ZAKONA O AKADEMSKOM INTEGRITETU**



the Counselor:  
**KLEMEN ŠUBIC**

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Funded  
by the European Union  
and the Council of Europe



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Implemented  
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## CURRENT STATE ANALYSIS AND WAYS FORWARD

## ANALIZA POSTOJEĆEG STANJA I PUT NAPRIJED

### ABOUT THE ANALYSIS

This analysis is focusing on an overview of the existing legal basis important for the establishment, application, and implementation of academic integrity principles and values in Montenegrin Higher Education. The aim is to examine which mechanisms are already in place, identifying all relevant stakeholders, their involvement and responsibilities and to bring those principles through fostering the values into life. At its core, it will deal with these challenges on a policy-making level, on the level of the Agency, responsible for quality assurance in higher education (AKOKVO) and on the institutional level (higher education institutions, hereinafter HEI).

**The purpose of the analysis is not to summarize but to address gaps for establishing appropriate relations and responsibilities between relevant stakeholders in Montenegrin higher education and to formulate concrete recommendations for raising awareness, taking responsibility and introducing mechanisms for implementing academic integrity values in internal and external quality assurance systems (IQA and EQA systems).**

The legal basis is the Law on Academic Integrity (Službeni list Crne Gore, br. 017/19 od 19.03.2019), which in its provisions clearly defines, among others, the meaning of the term "academic integrity" and explains the basic principles and values.

It stipulates, that academic integrity is based on the following principles:

- honesty,
- objectivity,
- openness,
- freedom in teaching and research and
- responsibility to Academia and Society/Community.

The law provides the basis for the establishment and operation of the Ethics Committee (hereinafter EC), which is the highest (moral) authority in the field of monitoring and advocating the principles of academic integrity in the country while determining also the establishment of ethics commissions/bodies at the higher education institutions. The implementation of this basic integrity principles at institutional level can be seen in adopted Codes of Ethics and may differ from one HEI to another and from one academic community to another.

The term academic integrity could be defined through prescribed criteria (quantitative and qualitative), through measures and mechanisms (what is to be considered)

### O ANALIZI

Ova analiza se fokusira na pregled postojećih pravnih osnova važnih za uspostavljanje, primjenu i sprovođenje načela i vrijednosti akademskog integriteta u visokom obrazovanju Crne Gore. Cilj je da se ispita koji mehanizmi su već uspostavljeni, da se prepoznaju svi relevantni akteri, njihova uključenost i odgovornost i da ta načela zažive kroz promovisanje vrijednosti. Analiza će se, u suštini, ovim izazovima baviti na nivou kreiranja politika, na nivou Agencije nadležne za obezbjeđivanje kvaliteta u visokom obrazovanju (AKOKVO) i na institucionalnom nivou (ustanove visokog obrazovanja, u daljem tekstu UVO).

**Svrha analize nije da ponudi sažeti pregled, već da razmotri nedostatke u uspostavljanju odgovarajućih odnosa i nadležnosti između relevantnih aktera u crnogorskom visokom obrazovanju i da formulise konkretnе preporuke za podizanje svijesti, preuzimanje odgovornosti i uvođenje mehanizama za primjenu vrijednosti akademskog integriteta u sistemima unutrašnjeg i eksternog obezbjeđivanja kvaliteta (sistemi UOK i EOK).**

Kao pravna osnova korišćen je Zakon o akademskom integritetu (Službeni list Crne Gore, br. 017/19 od 19.03.2019.), koji u svojim odredbama jasno propisuje, između ostalih, značenje termina „akademski integritet“ i objašnjava osnovna načela i vrijednosti.

Zakon propisuje da se akademski integritet temelji na sljedećim načelima:

- čestotosti,
- objektivnosti,
- otvorenosti,
- slobodi u nastavi i istraživanju, i
- odgovornosti prema akademskoj zajednici i društvu.

Zakon daje osnovu za formiranje i rad Etičkog komiteta (u daljem tekstu EK), najvišeg (moralnog) autoriteta u oblasti praćenja i promovisanja načela akademskog integriteta u zemlji, koji istovremeno određuje osnivanje etičkih odbora/tijela na ustanovama visokog obrazovanja. Primjena ovih osnovnih načela integriteta na institucionalnom nivou može se vidjeti u usvojenim etičkim kodeksima i može se razlikovati od jedne UVO do druge i od jedne akademske zajednice do druge.

Pojam akademski integritet mogao bi da se definije kroz propisane kriterijume (kvantitativne i kvalitativne), kroz mjere i mehanizame (šta se smatra povre-

red as misconduct of academic integrity, how it is to be controlled) but is inevitably correlated with the change of conduct, of culture within the community and could be more productively addressed through promoting their values, responsibility, mutual trust, through transparency of key stakeholders operations and through prevention of conflict of interest. This shift in mentality cannot be achieved overnight but requires dedication, the openness of minds, willingness in adapting to changes, it needs the shift in the paradigm.

»People of integrity and honesty not only practice what they preach, they are what they preach.«

— David A. Bednar

»When you are able to maintain your own highest standards of integrity – regardless of what others may do – you are destined for greatness.«

— Napoleon Hill

»In looking for people to hire, look for three qualities: integrity, intelligence and energy. And if they don't have the first, the other two will kill you.«

— Warren Buffett

»Have the courage to say no. Have the courage to face the truth. Do the right thing because it is right. These are the magic keys to living your life with integrity.«

— W. Clement Stone

»Your beliefs become your thoughts, Your thoughts become your words, Your words become your actions, Your actions become your habits,

Your habits become your values, Your values become your destiny.«

— Mahatma Gandhi

dom akademskog integriteta, kako se provjerava), ali je neizbjegno povezan sa promjenom ponašanja i kulture unutar zajednice i može se produktivnije razvijati promovisanim vrijednosti, odgovornosti, međusobnog povjerenja u toj zajednici, kroz transparentnost poslovanja ključnih aktera i sprječavanjem sukoba interesa. Takva promjena mentaliteta se ne može ostvariti preko noći, već zahtjeva predanost, otvorenost uma, spremnost na prilagođavanje promjenama. Potrebna je promjena paradigme.

„Ljudi od integriteta i časti ne samo da u praksi primjenjuju ono što zagovaraju, oni jesu ono što zagovaraju.“

— David A. Bednar

„Kada ste sposobni da očuvate sopstvene najveće standarde integriteta, bez obzira što drugi možda rade, predodređeni ste za velike stvari.“

— Napoleon Hill

„Kada zapošljavate ljude, tražite tri osobine: integritet, inteligenciju i energiju. Ako nemaju prvu, ostale dvije će vas uništiti.“

— Warren Buffett

„Budite hrabri da kažete ne. Budite hrabri da se suočite sa istinom. Uradite pravu stvar zato što je ispravna. To su čarobne formule da živate život pun integriteta.“

— W. Clement Stone

„Vaša vjerovanja postaju vaše misli, Vaše misli postaju vaše riječi, Vaše riječi postaju vaša djela, Vaše djela postaju vaše navike, Vaše navike postaju veše vrijednosti,

Vaše vrijednosti postaju vaša sudska sudbina.“

— Mahatma Gandhi

## INTRODUCTION

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**International Centre for Academic Integrity<sup>1</sup>** defines **6 fundamental values of academic integrity:**

1. **Honesty**, defined as: *Academic communities of integrity advance the quest for truth and knowledge through intellectual and personal honesty in learning, teaching, research, and service.*
2. **Trust**, defined as: *Academic communities of integrity both foster and rely upon climates of mutual trust. Climates of trust encourage and support the free exchange of ideas which in turn allows scholarly inquiry to reach its fullest potential.*
3. **Responsibility**, defined as: *Academic communities of integrity rest upon foundations of personal accountability coupled with the willingness of individuals and groups to lead by example, uphold mutually agreed-upon standards, and take action when they encounter wrongdoing.*
4. **Respect**, defined as: *Academic communities of integrity value the interactive, cooperative, participatory nature of learning. They honor, value, and consider diverse opinions and ideas.*
5. **Fairness**, defined as: *Academic communities of integrity establish clear and transparent expectations, standards, and practices to support fairness in the interactions of students, faculty, and administrators.*
6. **Courage**, defined as: *To develop and sustaining communities of integrity, it takes more than simply believing in the fundamental values. Translating the values from talking points into action-standing up for them in the face of pressure and adversity—requires determination, commitment, and courage.*

Academic integrity is more than a moral code or ethical policy, it is more than academic standards and criteria. It represents the way of living, thinking, behaving, and operating, it represents the state of mind of individuals and is incorporated into the collective mind of the community and institutions on different levels, it combines principles and values. Since this analysis is focused on the view on academic integrity through the eyes of quality assurance (and enhancement) system, it is relevant to first determine the framework of operations and the scope of responsibilities of all parties involved.

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<sup>1</sup> <https://www.academicintegrity.org/wp-content/uploads/2017/12/Fundamental-Values-2014.pdf>

## UVOD

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**Međunarodni centar za akademski integritet<sup>1</sup>** definiše **6 osnovnih vrijednosti akademskog integriteta:**

1. Čestitost, koja se definiše kao: Akademske zajednice od integriteta unapređuju potragu za istinom i znanjem putem intelektualne i lične čestitosti u učenju, nastavi, istraživanju i radu.
2. **Povjerenje**, koje se definiše kao: Akademske zajednice od integriteta obogaćuju i oslanjaju se na klimu uzajamnog povjerenja. Klima povjerenja podstiče i podržava slobodnu razmjenu ideja koja sa druge strane omogućava da naučno istraživanje ostvari svoj puni potencijal.
3. **Odgovornost**, koja se definiše kao: Akademske zajednice od integriteta izgrađene su na temeljima lične odgovornosti povezane sa spremnošću pojedinaca i grupa da vode svojim primjerom, da podržavaju međusobno dogovorene standarde i preduzmu mјere kada nađu na neispravno postupanje.
4. **Poštovanje**, koje se definiše kao: Akademske zajednice od integriteta cijene interaktivnu, kooperativnu i participativnu prirodu učenja. Takve zajednice poštuju, cijene i razmatraju različita mišljenja i ideje.
5. **Pravednost**, koja se definiše kao: Akademske zajednice od integriteta uspostavljaju jasna i transparentna očekivanja, standarde i prakse koje podržavaju pravednost u interakcijama studenata, profesora i službenika.
6. **Hrabrost**, koja se definiše kao: Za razvoj i održavanje zajednica od integriteta potrebno je više od pukog vjerovanja u osnovne vrijednosti. Prevođenje vrijednosti iz stavki govora u djela - zalaganje za njih kad se suočavate sa pritiskom i problemima - zahtijeva odlučnost, posvećenost i hrabrost.

Akademski integritet je više od moralnog kodeksa ili etičke politike, više je od akademskih standarda i kriterijuma. Akademski integritet predstavlja način života, razmišljanja, ponašanja i rada, predstavlja stanje uma pojedinaca i postaje sastavni dio kolektivnog uma zajednice i ustanova na različitim nivoima, i predstavlja kombinaciju načela i vrijednosti. Budući da se ova analiza fokusira na akademski integritet iz ugla sistema obezbjeđenja (i unapređenja) kvaliteta, važno je prvo utvrditi okvir djelovanja i opseg odgovornosti svih uključenih aktera.

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<sup>1</sup> <https://www.academicintegrity.org/wp-content/uploads/2017/12/Fundamental-Values-2014.pdf>

## FRAMEWORK

The legal framework represents the Law on Academic Integrity, which regulates principles of academic integrity of teaching staff, students, as well as other persons involved in higher education (hereinafter HE), defines forms of violation of academic integrity and prescribes the procedures for the protection of academic integrity (Article 1).

According to the Law, academic integrity is academic behavior that ensures the preservation of academic honesty, the dignity of the profession, quality of the work and outcomes. It promotes equal cooperation with all participants in the academic society, with a focus on seeking truth as a core value, it advocates compliance with legal regulations as the basis of responsibility of members of the academic community, that is, any conduct that is consistent with the principles of academic integrity (Article 2).

The highest moral authority in Montenegro is the EC (Etički komitet) with tasks stipulated in Article 14 of the Law on Academic Integrity. The EC:

- 1) adopts and monitors the application of the Ethics Charter;
- 2) promotes the principles of academic integrity;
- 3) decides on the proposal for determining the violation of academic integrity for the citizens of Montenegro up whose work has been published, i.e. the qualification acquired outside Montenegro;
- 4) gives an opinion on regulations and initiatives concerning academic ethics;
- 5) submits to the Government of Montenegro an annual report on its work;
- 6) performs other tasks in accordance with this Law.

At the level of external quality assurance (EQA) AKOKVO adopted the Rules on the procedure of re-accreditation of a higher education institution (Sl. list CG, br. 44/2014, 52/2014, 47/2015, 40/2016, 42/2017, 71/2017 i 55/2018; hereinafter the Rules for re-accreditation) in December 2019. The Rules for re-accreditation in its Standard 1 (Paragraph d and e) stipulates that the HEI self-evaluation reports should adequately address the academic integrity and clarify the implementation of its mechanisms into the QA policy.

Standard 1: QA policy

Paragraph d):

*The policy of the institution supports academic integrity and academic freedom, while paying close attention to*

## OKVIR

Zakonski okvir predstavlja Zakon o akademskom integritetu koji uređuje načela akademskog integriteta nastavnika, saradnika, studenata, kao i drugih lica sa visokim obrazovanjem (u daljem tekstu VO), oblike kršenja akademskog integriteta i propisuje postupak zaštite akademskog integriteta (član 1).

U skladu sa zakonom, akademski integritet je akademsko ponašanje koje obezbeđuje očuvanje akademske čestitosti, dostojanstva profesije, kvaliteta rada i proizvoda rada, duha ravnopravne saradnje sa svim učesnicima akademskog procesa, usmjerenosti na istinu kao temeljnu vrijednost i poštovanje zakonskih propisa kao osnove odgovornosti članova akademske zajednice odnosno svako ponašanje koje je u skladu sa načelima akademskog integriteta (član 2).

Najveći moralni autoritet je Etički komitet (EK) čije su nadležnosti propisane u članu 14 Zakona o akademskom integritetu. EK:

- 1) donosi i prati primjenu Etičke povelje;
- 2) promoviše načela akademskog integriteta;
- 3) odlučuje po prijedlogu za utvrđivanje kršenja akademskog integriteta za građane Crne Gore čiji je rad objavljen, odnosno kvalifikacija stečena van Crne Gore;
- 4) daje mišljenje o propisima i inicijativama koja se tiču akademske etike;
- 5) podnosi Vladi Crne Gore godišnji izvještaj o svom radu;
- 6) obavlja i druge poslove u skladu sa ovim zakonom.

Na nivou eksternog obezbeđenja kvaliteta (EOK), AKOKVO je u decembru 2019. godine usvojila Pravila o postupku reakreditacije ustanova visokog obrazovanja (Službeni list crne Gore, br. 44/2014, 52/2014, 47/2015, 40/2016, 42/2017, 71/2017 i 55/2018; u daljem tekstu: Pravila o reakreditaciji). Pravila o reakreditaciji u standardu 1 (kriterijumi d i e) propisuju da izvještaji o samoevaluaciji UVO treba na odgovarajući način da obuhvate pitanje akademskog integriteta i u politici OK pojasne primjenu njegovih mehanizama.

Standard 1: Politika obezbeđenja kvaliteta

Kriterijum d):

*Politika ustanove podržava akademski integritet i slobode, pri čemu se budno pazi na mogućnost pojave*

*the possibility of academic fraud.*

Paragraph e):

*The institution's policy protects against intolerance of any kind or discrimination directed against students or employees.*

AKOKVO as national EQA authority monitors the effectiveness of the implementation of academic integrity principles at the level of HEI's strategic and QA documents.

HEI in Montenegro are thus obliged to respect the principles of academic integrity stipulated by law and bylaws and to successfully integrate them into strategic documents and into their internal QA system (as part of self-evaluation) in accordance with the Rules on reaccreditation of HEI's. In reviewing the situation, it can be seen that universities have adopted codes of ethics, where the principles for respecting academic integrity are specified through clearly defined expectations and values. Procedures, bodies and responsibilities, as well as sanctions for infringements, are set out.

The relevant document for the prevention of plagiarism in Montenegro is feasibility study from the Ministry of Education, which was published within the project HERIC »**Higher Education and Research for Innovation and Competitiveness**« in September 2016. This »Feasibility study on the proposed tailor-made system(s) for the prevention of plagiarism in Montenegro« can serve as a very good example of the analysis and usefulness of various online tools for plagiarism detection engines in HE, while offering an in-depth review into the very concept of plagiarism and addressing it through various aspects and manifestations. As can be seen from this study, in the case of providing adequate human resources, it is also important to respect and honor the principles and values of the integrity of the individuals and society/community.

Not only academic integrity is important, as defined by the Law on Academic Integrity, but integrity as a broader concept, which includes respect for the rules of law (and bylaws), encourages transparency of all stakeholder's operations, eliminates corruption, and prevents conflicts of interest.

Since academic integrity is a term usually limited to the academic community and related to HEI's IQA, the term integrity (in its broader sense) will be used, when referring to EQA and their stakeholders like Ethics Committee, AKOKVO, students in general, and other relevant stakeholders.

*akademskih prevara.*

Kriterijum e):

*Politika ustanove štiti od netolerantnosti bilo koje vrste ili diskriminacije usmjerene protiv studenata ili zaposlenih.*

Kao nacionalno tijelo za EOK, AKOKVO prati djelotvornost primjene načela akademskog integriteta na nivou strateških dokumenata i dokumenata za obezbjeđenje kvaliteta u UVO.

UVO u Crnoj Gori su na taj način dužne da poštuju načela akademskog integriteta propisana zakonom i podzakonskim aktima i da ih uspješno integriraju u strateška dokumenta i svoj interni sistem OK (kao dio samoevaluacije) u skladu sa Pravilima o reakreditaciji UVO. Analizirajući situaciju, može se primjetiti da su univerziteti usvojili etičke kodekse u kojima su načela za poštovanje akademskog integriteta precizirana kroz jasno definisana očekivanja i vrijednosti. Definišani su postupci, tijela i odgovornosti, kao i sankcije za kršenja.

Relevantan dokument za sprečavanje plagijarizma u Crnoj Gori je studija izvodljivosti Ministarstva prosvjete, koja je objavljena u okviru projekta HERIC „**Visoko obrazovanje i istraživanje za inovacije i konkurentnost**“ u septembru 2016. godine. Ova „Studija izvodljivosti o predloženom prilagođenom sistemu za sprečavanje plagijarizma u Crnoj Gori“ može da posluži kao veoma dobar primjer analize i upotrebljivosti različitih internet alata za otkrivanje plagijata u UVO, a istovremeno nudi detaljan pregled samog koncepta plagijarizma i njegovog rješavanja kroz različite aspekte i pojave. Kao što se može vidjeti iz ove studije, u slučaju obezbjeđivanja odgovarajućih ljudskih resursa, važno je poštovati i uvažiti načela i vrijednosti integriteta pojedinaca i društva/zajednice.

Nije bitan samo akademski integritet, kako je to definisano Zakonom o akademskom integritetu, već integritet kao širi pojam, koji obuhvata poštovanje pravila zakona (i podzakonskih akata), podstiče transparentnost rada svih aktera, eliminiše korupciju i sprječava sukob interesa.

Pošto je akademski integritet pojam koji je obično ograničen na akademsku zajednicu i povezan sa UOK u UVO, pojam integritet (u širem smislu) će se koristiti kada se ukazuje na EOK i aktere kao što su Etički komitet, AKOKVO, studente generalno i druge relevantne aktere.

## THE CONCEPT OF ACADEMIC INTEGRITY IN RELATION TO ENSURING THE INTEGRITY OF ALL STAKEHOLDERS IN HIGHER EDUCATION (EQA AND IQA)

In Montenegrin HE the Law on Academic Integrity with the Rules for re-accreditation represents the legal basis for HEI's to take actions and to implement sufficient mechanisms to assure adequate level of academic integrity and respect of determined principles and values. The responsibility lies within the HEI, their management, staff and students. The adoption of appropriate internal acts (code of ethics) and the establishment of rules for the verification and prevention of plagiarism and frauds is the first step towards achieving a certain level of integrity within the academic community.

Equally important is the role of an EQA system, which should serve not only as a regulator but rather as a facilitator for the empowerment of HEI. One way is through monitoring (external evaluations) and advising to stakeholders and also as a role model (leading by example). Each stakeholder and all together are responsible for the successful implementation of integrity principles and values into the system.

The establishment and maintenance of academic integrity in community is not just a matter of policy making. Policy making serves as a systemic framework, but the implementation of academic integrity strongly relies on the actions taken by each individual or organization in community.

## KONCEPT AKADEMSKOG INTEGRITETA I OBEZBJEĐENJE INTEGRITETA SVIH AKTERA U VISOKOM OBRAZOVANJU (EOK I UOK)

U crnogorskom visokom obrazovanju, Zakon o akademskom integritetu i Pravila o reakreditaciji predstavljaju pravni osnov za UVO da preduzmu radnje i primjene odgovarajuće mehanizme da obezbijede odgovarajući nivo akademskog integriteta i poštovanja utvrđenih načela i vrijednosti. Odgovornost leži na UVO, njihovom rukovodstvu, kadrovima i studentima. Donošenje odgovarajućih internih akata (etičkog kodeksa) i utvrđivanje pravila za provjeru i sprječavanje plagijata i prevara je prvi korak ka postizanju određenog nivoa integritet u akademskoj zajednici.

Jednako je važna i uloga sistema EOK, koji bi trebao da posluži ne samo kao regulator već i kao posrednik za osnaživanje UVO. Jedan od načina da se to ostvari je putem praćenja (eksterne evaluacije) i savjetovanja aktera, ali i kada djelujete kao uzor (vodite svojim primjerom). Svaki akter pojedinačno i svi akteri zajedno su odgovorni za uspješnu primjenu načela integriteta i vrijednosti u sistemu.

Uspostavljanje i održavanje akademskog integriteta u zajednici nije samo pitanje kreiranja politika. Kreiranje politika služi kao sistemski okvir, ali se primjena akademskog integriteta snažno oslanja na radnje koje preuzimaju svaki pojedinac ili organizacija u zajednici.

## **ETHICS COMMITTEE – moral authority**

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As the highest moral authority, the EC is responsible for preservation, improvement, protection, and promotion of academic integrity and also for prevention of all forms of violations of academic integrity.

Seven members of the EC are appointed by the Government of Montenegro for a period of four years, on proposal of the state administration body responsible for education. Members of the EC are prominent experts in the field of HE and science from various scientific disciplines and are selected on the basis of a public call (Article 13 Law on Academic Integrity).

**In order to operate as a highest moral authority in the field of academic integrity it is advised also to operate as such and in a transparent way. Members of the EC shall act professionally, autonomously and independently in their work and shall not be bound by any decisions, positions and directions of the institutions they designate, or other institutions and/or individuals.**

In carrying out their tasks and taking decisions, they shall take into account the principle of the prevention of conflicts of interest and the principle of impartiality.

**At the policy-making level, it is also extremely important to ensure and maintain high moral values and integrity of the members of the EC. Selection procedures shall therefore be transparent and shall include a criterion regarding moral and ethical values of the members. The members of the EC shall demonstrate significant level of academic integrity in workplace and in community.**

As such the members shall steadfast adherence to a strict moral and ethical code. Therefore, it is advised, that **the EC adopts its own ethical code** and appropriate mechanisms for constant monitoring of potential risks in order to eliminate threats timely.

**The EC is the main promotor of academic integrity and as such recognized also as a relevant actor in the EQA system.**

## **ETIČKI KOMITET – moralni autoritet**

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Kao najviši moralni autoritet, EK je nadležan za očuvanje, unapređenje, zaštitu i promociju akademskog integriteta, kao i za sprječavanje svih oblika kršenja akademskog integriteta.

Vlada Crne Gore na period od četiri godine imenuje sedam članova EK, na prijedlog organa državne uprave nadležnog za poslove prosvjete. Članovi EK su istaknuti eksperti iz oblasti visokog obrazovanja i nauke iz različitih naučnih disciplina i biraju se na osnovu javnog poziva (član 13 Zakona o akademskom integritetu).

**Da bi funkcionisao kao najviši moralni autoritet u oblasti akademskog integriteta preporučuje se da EK pored toga bude i transparentan u radu. Članovi EK su dužni da u svom radu postupaju profesionalno, samostalno i nezavisno, i ne mogu ih obavezivati odluke, stavovi i smjernice ustanova koje predstavljaju ili drugih ustanova i/ili pojedinaca.**

U obavljanju svojih poslova i odlučivanju članovi su dužni da u obzir uzmu princip sprječavanja sukoba interesa i načelo nepristrasnosti.

**Na nivou kreiranja politike, izuzetno je važno obezbijediti i održavati visoke moralne vrijednosti i integritet članova EK. Postupak biranja članova stoga mora da bude transparentan i mora da obuhvati kriterijum o moralnim i etičkim vrijednostima članova. Članovi EK su dužni da pokažu značajan nivo akademskog integriteta na radnom mjestu i u zajednici.**

Članovi su, kao takvi, obavezni da se čvrsto pridržavaju strogog moralnog i etičkog kodeksa. Stoga se preporučuje da **EK usvoji sopstveni etički kodeks** i odgovarajuće mehanizme za stalno praćenje potencijalnih rizika u cilju pravovremenog eliminisanja prijetnji.

**EK je glavni promotor akademskog integriteta i kao takav je prepoznat kao relevantan akter u sistemu EOK.**

## EXTERNAL QUALITY ASSURANCE and ACADEMIC INTEGRITY

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The Law on Academic Integrity defines academic principles honesty, objectivity, openness, freedom in teaching and research and responsibility to academia and society. In addition to the statutory principles that apply to HEI and the academic community only, it is very important that all stakeholders in the Montenegrin HE area (not HEI and the academic community only) also follow the following **guiding principles**:

- ✓ **WALK THE TALK**, defined as *to perform actions consistent with one's claims*<sup>2</sup>. The one who is the catalyst of positive change in community should also become its first ambassador. Such a respectable position in community can only be achieved by fully complying with the principles it advocates and represents, and by strengthening its own authenticity, which is one of the foundations on which credibility is built.
- ✓ **LEADING BY EXAMPLE**: taking on the role of moral authority in field of integrity in a broader sense.
- ✓ **TRANSPARENCY**: Transparent operations are a precondition for strengthening academic integrity at HEI and integrity in community, so all stakeholders in the HE area should be encouraged to follow this principle.
- ✓ **COOPERATION AND INTEGRATION**: All stakeholders (Ministry, EC, management of HEI, AKOKVO, teachers, students and representatives of the economy) should be actively involved in the process of strengthening the principles and values of academic integrity.
- ✓ **ZERO TOLERANCE**: opinion makers or leading stakeholders committed to strengthening academic integrity (Ministry for Education, EC, AKOKVO) in the Montenegrin HE area should take a clear and firm position in the public regarding zero tolerance for any forms and violations of the values and principles of academic integrity. The members of the EC and all other respectable individuals should set a mirror to community with leading by example.

## EKSTERNO OBEZBEĐENJE KVALITETA i AKADEMSKI INTEGRITET

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Zakon o akademskom integritetu definiše akademska načela čestitosti, objektivnosti, otvorenosti, slobode u nastavi i istraživanju i odgovornosti prema akademskoj zajednici i društvu. Pored zakonom propisanih načela koja se odnose samo na UVO i akademsku zajednicu, vrlo je važno da svi akteri u crnogorskem VO (ne samo UVO i akademska zajednica) poštuju i sljedeća **vodeća** načela:

- ✓ **PRAKTIKOVANJE ONOG ŠTO ZAGOVARATE** se definiše kao *postupanje u skladu sa svojim stavovima*<sup>2</sup>. Pojedinci koji nastupaju kao katalizatori pozitivne promjene u zajednici treba takođe da postanu njen glavni ambasador. Takav položaj od ugleda u zajednici se može postići samo potpunim poštovanjem načela koje pojedinac zagovara i zastupa, kao i jačanjem sopstvene autentičnosti, što je jedan od temelja na kojem se gradi kredibilitet.
- ✓ **VOĐENJE PRIMJEROM**: preuzimanje uloge moralnog autoriteta na polju integriteta u širem smislu.
- ✓ **TRANSPARENTNOST**: transparentan rad je preduslov za jačanje ekonomskog integriteta u UVO i zajednici, pa sve aktere treba podstaći da slijede ovo načelo.
- ✓ **SARADNJA I INTEGRACIJA**: sve aktere (Ministarstvo, EK, menadžment UVO, AKOKVO, nastavnici, studenti i predstavnici ekonomije) treba aktivno uključiti u proces jačanja načela i vrijednosti akademskog integriteta.
- ✓ **NULTA TOLERANCIJA**: kreatori mišljenja ili vodeći akteri posvećeni jačanju akademskog integriteta (Ministarstvo prosvjete, EK, AKOKVO) u oblasti VO u Crnoj Gori treba da zauzmu jasan i čvrst stav u javnosti u pogledu nulte tolerancije prema svim oblicima i kršenjima vrijednosti i načela akademskog integriteta. Članovi EK i svi drugi ugledni pojedinci treba da budu ogledalo zajednice na način što će voditi svojim primjerom.

**AKOKVO, as a national accreditation body, operating as EQA regulator and the guardian of quality in Montenegrin HE, may play a significant role in promoting the values and principles of academic integrity by using the holistic approach. Holistic in a sense of accepting academic integrity as a part of EQA, not only when monitoring if the HEI have appropriate mechanisms in place with their IQA and their strategic objectives, but more importantly to act as a bridge between the EC and HEI, to lead by example and to become a moderator of integrity.**

AKOKVO shall become the moderator of integrity on three levels:

- on policy-making level,
- on EQA level and also
- on IQA level.

#### **AKOKVO AS MODERATOR ON POLICY-MAKING LEVEL**

At the policy making level AKOKVO shall:

- maintain close relations to the EC, acting as a bridge between HEI and policy makers;
- be involved (as a relevant stakeholder) in discussions on amendments to the Law on Academic Integrity and to other relevant legislation;
- collaborate with the EC on identifying good practices and promoting excellence (e.g. an annual award for excellence in following the principles and values of Academic Integrity – for HEI and individuals);
- perform thematic analysis on application and implementation of academic integrity principles and values into IQA systems in Montenegro and suggest recommendations for improvement and preventions of fraud and misconduct, if identified (at the policy-making level).

**AKOKVO, kao nacionalno akreditaciono tijelo koje djeluje kao regulator EOK i čuvar kvaliteta u crnogorskim UVO, može primjenom holističkog pristupa da odigra značajnu ulogu u promovisanju vrijednosti i načela akademskog integriteta. Taj holistički pristup se odnosi na prihvatanje akademskog integriteta kao dijela EOK, a ne samo prilikom praćenja da li su UVO uspostavile odgovarajuće mehanizme sa svojim UOK i svojim strateškim ciljevima. Ono što je važnije je da Agencija djeluje kao most između EK i UVO, da vodi svojim primjerm i postane moderator integriteta.**

AKOKVO će postati moderator integriteta na tri nivoa:

- na nivou kreiranja politika,
- na nivou EOK, i isto tako
- na nivou UOK.

#### **AKOKVO KAKO MODERATOR NA NIVOU KREIRANJA POLITIKA**

Na nivou kreiranja politika AKOKVO:

- održava bliske odnose sa EK i djeluje kao most između UVO i kreatora politika;
- učestvuje (kao relevantni akter) u raspravama o izmjenama i dopunama Zakona o akademskom integritetu i drugim relevantnim zakonskim propisima;
- sarađuje sa EK na prepoznavanju dobrih praksi i promociji izvrsnosti (npr. godišnja nagrada za izvrstnost u skladu sa načelima i vrijednostima akademskog integriteta - za UVO i pojedince);
- sprovodi tematsku analizu o primjeni i sprovođenju načela i vrijednosti akademskog integriteta u sistemima UOK u Crnoj Gori i predlaže preporuke za poboljšanje i sprječavanje prevara i neprimjerenog ponašanja, ako se utvrde (na nivou kreiranja politika).

## AKOKVO AS A MODERATOR ON EQA LEVEL

At EQA level AKOKVO takes on the role of the moderator of activities for strengthening and raising awareness of the importance of academic integrity in the Montenegrin HE area. To this end, AKOKVO should first ensure the consistent implementation of the proposed guiding principles within the Agency:

- **WALK THE TALK:** the things he demands from others, AKOKVO consistently respects and implements first himself;
- **TRANSPARENCY:** ensure transparent publication of the results of the self-evaluation procedure (self-evaluation reports should be objective and address all challenges recorded in self-evaluation procedures);
- **ZERO TOLERANCE:** publicly takes a position of zero tolerance for any form of breach of academic integrity;
- **COOPERATION AND INTEGRATION AND LEADING BY EXAMPLE:** encourages cooperation between stakeholders and encourages the presentation of good practices, taking on the role of ambassador of academic integrity in the country.

In order to raise awareness of the importance of academic integrity and capacity building AKOKVO shall:

- **include issues related to respect of academic integrity in its self-evaluation process** (for all internal stakeholders; staff, management, experts), thus gaining insight into the current state of affairs. Such a self-evaluation can also serve as the basis for preparing the AKOKVO's annual action plan for strengthening integrity (reports and documents published by the AKOKVO that are copyrighted work must respect the principles of academic integrity; e. g. accreditation and evaluation reports, thematic analysis, etc.);
- **annually organize internal workshops** with key stakeholders on the topic of academic integrity, where relevant questions about academic integrity policies and procedures are addressed, examples of good practice are elaborated and key risks are identified;
- **organize** (once every two years) **a symposium** on the topic of academic integrity, where lectures are given by domestic and foreign experts, and at the same time, the symposium also serves to present good practices. After the

## AKOKVO KAO MODERATOR NA NIVOU EOK

Na nivou EOK, AKOKVO dobija ulogu moderatora aktivnosti usmjerenih na jačanje i podizanje svijesti o značaju akademskog integriteta u oblasti VO u Crnoj Gori. U tom cilju, AKOKVO prvo treba da obezbije dosljednu primjenu predloženih vodećih načela u okviru Agencije:

- **PRAKTIKOVANJE ONOGA ŠTO ZAGOVARATE:** stvari koje traži od drugih, AKOKVO prvo sama konzistentno poštuje i primjenjuje;
- **TRANSPARENTNOST:** obezbeđuje transparentno objavljivanje rezultata postupka samoevaluacije (izvještaji o samoevaluaciji treba da budu objektivni i da ponude rješenja za sve izazove evidentirane tokom postupka samoevaluacije);
- **NULTA TOLERANCIJA:** javno zauzima stav nulte tolerancije prema svim oblicima kršenja akademskog integriteta;
- **SARADNJA I INTEGRACIJA I VOĐENJE PRIMJEROM:** podstiče saradnju između aktera kao i predstavljanje dobre prakse, preuzimajući na sebe ulogu ambasadora akademskog integriteta u zemlji.

U cilju podizanja svijesti o značaju akademskog integriteta i izgradnje kapaciteta, AKOKVO će:

- **u svoj proces samoevaluacije uključiti pitanja vezana za poštovanje akademskog integriteta** (za sve interne aktere; zaposlene, menadžment, eksperte), čime će steći uvid u trenutno stanje stvari. Takva samoevaluacija može da posluži i kao osnova za pripremu godišnjeg akcionog plana AKOKVO-a za jačanje integriteta (izvještaji i dokumenta objavljena od strane AKOKVO čija su autorska prava zaštićena moraju da poštuju načela akademskog integriteta; npr. izvještaji o akreditaciji i evaluaciji, tematske analize, itd.);
- **organizovati interne radionice na godišnjem nivou** sa ključnim akterima na temu akademskog integriteta, na kojima se razmatraju relevantna pitanja o politikama i procedurama akademskog integriteta, razrađuju primjeri dobre prakse i prepoznaju ključni rizici;
- **organizovati** (jednom u dvije godine) **simpozijum** na temu akademskog integriteta, na kojem će predavanja imati domaći i strani eksperti, a simpozijum će istovremeno poslužiti i za predstavljanje dobre prakse. Poslije sku-

event, an e-publication of papers by all lecturers is prepared, which shall be publicly available to the interested public on AKOKVO's website;

- **prepare recommendations** for HEI to strengthen the effectiveness of academic integrity policies, together with guidelines for presenting academic integrity to students (in collaboration with the Student Union);
- **organize workshops for HEI's management** and representatives of ethics committees. The purpose of the workshops is to establish recommendations for EQA and IQA procedures for identifying and addressing risks (to academic integrity principles and values) before they become real challenges;
- **prepare a set of Q&A's on academic integrity** and publish them on the AKOKVO's website, together with the links to legislation and relevant documents (the aim is to strengthen the communication via website and to turn it into a relevant and credible communication channel on academic integrity).
- Academic integrity should be seen as a topic that urgently needs its place in the media and public debate, therefore AKOKVO is advised to seek for the ways to **address the academic integrity in the media**;
- **produce a promotional video on academic integrity**, primarily intended for students, which is distributed to all HEI, student organizations and other stakeholders. The purpose of the video is to make public aware of the importance and of the role of academic integrity, to emphasize the positive aspects, and to raise awareness that academic integrity is part of broader moral values in society (example: In the video, prominent representatives of the economy are presented, explaining to students the importance and/or necessity of respecting the principles of ethics (integrity) for successful operation at home and abroad).

When following the implementation of academic integrity principles and values in the academic community at HEI, AKOKVO shall monitor (within the re-accreditation procedures):

- if HEI's policies support academic integrity and academic freedom, while paying close attention to the possibility of academic fraud, and
- if HEI have policies in place that protect against intolerance of any kind or discrimination direct-

pa izrađuje se elektronska publikacija radova svih predavača koja će biti dostupna javnosti na internet stranici AKOKVO-a;

- **izraditi preporuke** za UVO u cilju jačanja djelotvornosti politika akademskog integriteta, zajedno sa smjernicama za predstavljanje akademskog integriteta studentima (u saradnji sa Savezom studenata);
- **organizovati radionice za menadžment UVO** i predstavnike etičkih odbora. Cilj tih radionica je da se utvrde preporuke za postupke EOK i UOK za utvrđivanje i rješavanje rizika (po načela i vrijednosti akademskog integriteta) prije nego što postanu stvarni izazovi;
- **pripremiti skup pitanja i odgovora o akademskom integritetu** i objaviti ih na internet stranici AKOKVO, zajedno sa linkovima prema zakonskim propisima i relevantnim dokumentima (cilj je ojačati komunikaciju putem internet stranice i pretvoriti je u relevantan i vjerodostojan kanal komunikacije o akademskom integritetu).
- Akademski integritet treba posmatrati kao temu koja hitno treba da nađe svoje mjesto u medijima i javnoj raspravi. Stoga se AKOKVO preporučuje da pronađe načine za **razmatranje pitanja akademskog integriteta u medijima**;
- **snimiti promotivni video o akademskom integritetu**, koji je prvenstveno namijenjen studentima i koji će se distribuirati svim UVO, studentskim organizacijama i drugim akterima. Svrha video zapisa je da informiše javnost o značaju i ulozi akademskog integriteta, da istakne pozitivne aspekte i podigne svijest da je akademski integritet dio širih moralnih vrijednosti u društvu (na primjer: video zapis bi predstavio istaknute predstavnike ekonomije koji bi studentima objasnili značaj i/ili nužnost poštovanja načela etike (integriteta) za uspješan rad u zemlji i inostranstvu).

Prilikom praćenja primjene načela i vrijednosti akademskog integriteta u akademskoj zajednici na UVO, AKOKVO će pratiti (u okviru postupka reakreditacije):

- da li politike UVO podržavaju akademski integritet i akademsku slobodu, dok istovremeno pažljivo prate mogućnost akademske prevare, i
- da li su UVO usvojile politike koje štite od svih oblika netolerancije ili diskriminacije usmjere-

ed against students or employees (paragraph d and e, Standard 1, Rules for re-accreditation).

The findings (compliance, remarks, opinions, and suggestions for improvement) shall be elaborated in expert reports and thus available to AKOKVO for preparation of meta-analysis.

The presentation of the findings of such a meta-analysis may be a good starting point for organizing workshops and may serve as an additional training of the AKOKVO's experts, where both parties exchange views, findings, and examples of good practice. At the same time, the discussions will raise awareness among experts about the importance of the discussed themes and will offer content for possible changes to the standards of the Rules for re-accreditation.

In order to ensure the autonomy of expert groups and their independent assessment, AKOKVO should monitor risk factors on an ongoing basis and avoid conflicts of interest. The same applies to the members of decision-making body and AKOKVO employees. Current organizational structure of AKOKVO lacks a decision-making body in which all stakeholders are represented (representatives of HEIs, students, representatives of employers, research institutes, experts with international experience and/or foreign experts in the field of QA in HE, etc.). Although this is not a matter directly related to academic integrity, it is extremely important for the integrity of the AKOKVO and its independency, to include a collective body composed of representatives of all key stakeholders in its structure. The highest decision-making body within the Agency should strive to ensure impartiality and autonomy in decision-making. It is important that the representatives (members of this body) are not appointed by the Government nor the Ministry, but are appointed by the representative associations and universities on the basis of a public call from the Agency. Such a body (e.g. the Council of the Agency) is more resistant to impartiality and professionalism issues in decision-making if taking into account also the principles and values of integrity. It is advisable to amend the Higher Education Law (and/or the Agency's Statute) to such extend that additional (proper) decision-making body is envisaged and established.

All these internal stakeholders should be aware of the potential risks that may threaten their integrity, the integrity of AKOKVO and be able to eliminate them. AKOKVO is advised to include the monitoring of risk factors by employees, experts and members of decision-making bodies in the self-evaluation procedures. Based on the feedback analysis from internal stakeholders (questionnaires, interviews, anonymous reports) AKOKVO shall supplement their existing integrity plan and identify risk factors, while determining the level of risks and measures for improvement.

ne protiv studenata ili zaposlenih (kriterijumi d i e, Standard 1, Pravila o reakreditaciji).

Zaključci (usklađenost, napomene, mišljenja i sugestije za poboljšanje) će se razrađivati u izveštajima eksperata i na taj način biti dostupni AKOKVO-u za pripremu metaanalize.

Predstavljanje zaključaka takve metaanalize može biti dobro polazište za organizovanje radionica i može poslužiti kao dodatna obuka eksperata AKOKVO-a, prilika da obje strane razmijene mišljenja, zaključke i primjere dobre prakse. Istovremeno, rasprave će podići svijest eksperata o važnosti tema o kojima se razgovara i ponuditi sadržaj za moguće izmjene standarda iz Pravila o reakreditaciji.

Da bi se obezbijedila autonomija ekspertske grupa i njihova nezavisna procjena, AKOKVO treba kontinuirano da prati faktore rizika i izbjegava sukob interesa. Isto važi i za članove tijela za odlučivanje i zaposlene u AKOKVO. Sadašnjoj organizacionoj strukturi AKOKVO-a nedostaje tijelo za odlučivanje u koje su zastupljeni svi akteri (predstavnici UVO, studenti, predstavnici poslodavaca, istraživačkih instituta, eksperți sa međunarodnim iskustvom i/ili strani eksperți za oblast OK u VO, itd.) lako se radi o pitanju koje nije direktno povezano sa akademskim integritetom, izuzetno je važno za integritet AKOKVO i nezavisnost u njenu strukturu uključiti kolektivno tijelo sastavljeno od predstavnika svih ključnih aktera. Najviše tijelo za odlučivanje u okviru Agencije treba da teži obezbjeđivanju nepristrasnosti i autonomije u donošenju odluka. Važno je da predstavnike (članove ovog tijela) ne imenuje Vlada, niti Ministarstvo, već da ih imenuju reprezentativna udruženja i univerziteti na osnovu javnog poziva Agencije. Takvo tijelo (npr. Savjet Agencije) je otpornije na pitanja nepristrasnosti i profesionalizma u odlučivanju ako uzme u obzir načela i vrijednosti integriteta. Preporučuje se usvajanje izmjena i dopuna Zakona o visokom obrazovanju (i/ili statuta Agencije) u smislu da se predviđi osnivanje dodatnog (odgovarajućeg) tijela za odlučivanje.

Svi ovi interni akteri treba da budu svjesni potencijalnih rizika koji mogu da ugroze njihov integritet i integritet AKOKVO i da budu u mogućnosti da ih eliminišu. Preporučuje se da AKOKVO u postupak samoevaluacije uključi praćenje faktora rizika od strane zaposlenih, eksperata i članova tijela za odlučivanje. Na osnovu analize povratnih informacija dobijenih od internih aktera (upitnici, intervjuji, anonimni izvještaji), AKOKVO će dopuniti svoj postojeći plan integriteta, utvrditi faktore rizika i istovremeno odrediti nivo rizika i mјere za poboljšanje.

The term risk refers to the possibility of a certain undesirable situation occurring in the future. Risks from the integrity plan include the fact that illegal or unethical conduct of persons may result in damage to public funds, the issuance of illegal decisions, damage to the AKOKVO's reputation and integrity, or to the public interest. The existence of risks is strongly related to the existence of risk factors - circumstances due to which risks exist or which increase the probability of their realization.

When monitoring the current state of affairs and evaluating potential risks according to the Integrity Plan, AKOKVO shall follow the risk-management approach:

- no risk identified requires no action from AKOKVO,
- when insignificant risk is identified it should be regularly monitored, but no action is required at the moment,
- identification of a minor risk requires mild action in accordance with the Integrity Plan either individually or within an individual body or organizational unit,
- when a major risk is identified it should be understood as a threat and therefore immediate action in accordance with the Integrity Plan is required.

Transparency in AKOKVO's actions and operations, honoring principles and values of academic integrity and integrity as such, and by leading by example will contribute to the positioning of AKOKVO as a moderator of integrity.

By knowing its own functioning better, identifying potential risks, developing adequate mechanisms for the prevention of misconduct and protection of individuals, AKOKVO will be able to advise external stakeholders in the field of integrity. It is of utmost importance to openly discuss the key challenges in this area and to find solutions together. It is advisable that all changes to the AKOKVO's rules on academic integrity should be accepted with the consensus of all relevant stakeholders and properly tested before acceptance in order to ensure successful implementation in the EQA system.

## AKOKVO AS A MODERATOR ON IQA LEVEL

Following recommendations mentioned above, AKOKVO will be legitimate to advise (also through the groups of experts) HEI and encourage them to incorporate adequate mechanisms and tools, policies, and procedures to advocate integrity, and help them strengthen the culture of academic integrity. AKOKVO shall help educate the academic community and HEI about EQA expectations regarding academic integrity values

Pojam rizik odnosi se na mogućnost da u budućnosti dođe do određene nepoželjne situacije. Rizici iz plana integriteta podrazumijevaju činjenicu da nezakonito ili neetičko ponašanje pojedinih lica može dovesti do štete po javna sredstva, donošenje nezakonitih odluka, da nanese štetu ugledu i integritetu AKOKVO-a ili javnom interesu. Prisustvo rizika snažno je povezano sa postojanjem faktora rizika - okolnosti zbog kojih postoje rizici ili koje povećavaju vjerojatnoću njihove realizacije.

Kod praćenja trenutne situacije i procjene potencijalnih rizike prema Planu integriteta, AKOKVO će primjenjivati pristup upravljanja rizikom:

- Ako nije utvrđen nijedan rizik, AKOKVO ne preduzima nikakve radnje.
- Ako se utvrdi beznačajan rizik, treba ga redovno pratiti, ali u tom trenutku nije potrebno preduzimati radnje.
- Utvrđivanje manjeg rizika zahtjeva preduzimanje manjih radnji u skladu sa Planom integriteta, na pojedinačnom nivou ili u okviru pojedinačnog tijela ili organizacione jedinice.
- Utvrđivanje velikog rizika treba shvatiti kao prijetnju, pa je stoga neophodno odmah preduzeti radnje u skladu sa Planom integriteta.

Transparentnost u postupcima i poslovima AKOKVO-a, uz poštovanje načela i vrijednosti akademskog integriteta i integriteta kao takvog, kao i vođenje primjerom, će doprinijeti pozicioniranju AKOKVO-a kao moderatora integriteta.

Time što će bolje poznavati sopstveno funkcionisanje, prepoznati potencijalne rizike, razviti adekvatne mehanizme za sprječavanje neprimjereno ponašanja i zaštitu pojedinaca, AKOKVO će biti u mogućnosti da savjetuje eksterne aktere u oblasti integriteta. Od izuzetnog je značaja da se otvoreno razgovara o ključnim izazovima u ovoj oblasti i zajedno pronađu rješenja. Preporučuje se da sve izmjene pravila AKOKVO-a o akademskom integritetu budu prihvaćena konsenzusom svih relevantnih aktera i da budu adekvatno provjerene prije prihvatanja da bi se obezbijedila uspješna primjena u sistemu EOK.

## AKOKVO KAO MODERATOR NA NIVOU UOK

Primjenom gore navedenih preporuka, AKOKVO će imati legitimno pravo (i preko grupe eksperata) da savjetuje UVO i da ih podstakne da uključe odgovarajuće mehanizme i instrumente, politike i postupke čiji je cilj promoviranje integriteta i da im pomogne da ojačaju kulturu akademskog integriteta. AKOKVO će pomoći u edukaciji akademske zajednice i UVO o очekivanjima EOK u pogledu vrijednosti i načela akadem-

and principles so that they are understood equally. AKOKVO shall be aware that one “one size fits all” model could not be adequate for promoting the best practice among stakeholders, but instead they should be encouraged to follow their own path. In doing so, the AKOKVO’s task is to communicate clear expectations regarding the principles of operation, zero tolerance for deviations and violations, and to advise how to monitor the principles of academic integrity and pursue the values in its own self-evaluation procedures.

## ACADEMIC INTEGRITY AS INTEGRATED PART OF IQA

In addition to respecting legal provisions (the establishment of an ethics commissions and the adoption of a code of ethics) and the provisions of AKOKVO’s bylaws, HEI are encouraged to take a holistic approach to respect academic principles and values.

This means that they:

- primarily take care of adequate information and education in this field;
- establish clear policies that are understandable and acceptable to all internal stakeholders;
- set up (optional) an instrument of the „academic integrity ombudsman“ at the institution, whose task is to educate the academic community, promote principles and values among students and staff, to guard the academic integrity and to identify any forms of violations, misconducts, and inconsistencies. This institute can be introduced regardless of the existence of ethics commissions at HEI, it is only necessary to pay attention to the possible duplication of operations and responsibilities among them. The accountability of the ombudsman is to become the guardian of academic integrity and to monitor the implementation of the principles and values of academic integrity at HEI and in the academic community. His findings, opinions, and initiatives for improvement should be elaborated in a public report. It should have the legitimacy to propose matters (related to academic integrity) to the ethics commissions or to the HEI management on his own initiative or on the initiative of a third party (students, teachers). The findings and suggestions for improvement highlighted in his report shall also be addressed in the institution’s self-evaluation procedures;
- monitor compliance of operations with the academic integrity principles and values within self-evaluation procedures (example: questionnaires for students, teachers, and staff also

skog integriteta na način da ih svi jednako razumiju. AKOKVO zna da jedan model „koji odgovara svima“ ne može biti odgovarajući za promovisanje najbolje prakse među akterima, i umjesto toga treba da ih podstakne da slijede sopstveni put. Pri tome je zadatok AKOKVO-a da prenese jasna očekivanja u vezi sa načelima rada, nulte tolerancije za odstupanja i kršenja i da ih savjetuje kako da prate načela akademskog integriteta i teže vrijednostima u sopstvenim postupcima samoevaluacije.

## AKADEMSKI INTEGRITET KAO INTEGRISANI DIO UOK-a

Pored postupanja u skladu sa zakonskim odredbama (osnivanje etičkih odbora i usvajanje etičkog kodeksa) i odredbama podzakonskih akata AKOKVO-a, UVO se podstiču na holistički pristup u poštovanju akademskih načela i vrijednosti.

To znači da UVO:

- prvenstveno vode računa o odgovarajućem informisanju i edukaciji u ovoj oblasti;
- utvrđuju jasne politike koje su razumljive i prihvatljive svim internim akterima;
- uvode (opciono) u ustanovu instrument „ombudsmana akademskog integriteta“, čiji je zadatok da edukuje akademsku zajednicu, promoviše načela i vrijednosti među studentima i zaposlenima, čuva akademski integritet i utvrdi sve vrste povreda, neprimjerenog ponašanja i nedosljednosti. Ovaj institut se može uvesti bez obzira na postojanje etičkih odbora na UVO, samo je potrebno obratiti pažnju na moguće dupliranje poslova i nadležnosti među njima. Odgovornost ombudsmana je da postane čuvar akademskog integriteta i da prati primjenu načela i vrijednosti akademskog integriteta na UVO i u akademskoj zajednici. Njegovi nalazi, mišljenja i inicijative za poboljšanje treba da budu razrađena u javnom izvještaju. Ombudsman treba da ima legitimitet da predlaže pitanja (koja se odnose na akademski integritet) etičkim odborima ili menadžmentu UVO na sopstvenu inicijativu ili na inicijativu treće strane (studenti, nastavnici). Zaključci i prijedlozi za poboljšanja na koje bude ukazano u njegovom izvještaju će se isto tako razmatrati tokom postupka samoevaluacije ustanove;
- u okviru postupka samoevaluacije prate usklađenost rada sa načelima i vrijednostima akademskog integriteta (primjer: upitnici za studente, nastavnike i zaposlene sadrže i pi-

- include questions on academic integrity);
- organize round tables and workshops and doing so taking care of promotion of the principles and values of academic integrity in the community;
- cooperate with AKOKVO and the EC in training members of ethics commissions and in organizing events covering all relevant topics of academic integrity;
- publish (transparent operation) reports on the results of the work of ethics commissions and of the „academic integrity ombudsman“ and include them in the plans of improvement activities for the future;
- educate and train students in respecting the values of academic integrity and promote their principles;
- prepare an integrity plan where they identify risk factors and propose measures for improvement;
- promote the principle of zero tolerance in cases of breach of these principles and values;
- and more.

## CONCLUSION

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In conclusion, let us return to the beginning and, through the experience of systems with a successfully crafted and implemented long history of respect for academic integrity, relive this sensitive and fragile yet powerful and resolute theme that shapes individuals and communities, strengthens mutual trust, respect and belonging, but also boosts the quality culture of the community - ACADEMIC INTEGRITY.

*When considering academic integrity, the discussion tends to revolve around cheating, plagiarism, dishonesty, fraud, and other academic malpractice and how best to prevent these behaviors. A more productive approach entails a focus on promoting the positive values of honesty, trust, fairness, respect, responsibility, and courage (International Center for Academic Integrity, 2013) as the intrinsically motivated drivers for ethical academic practice. Academic integrity is much more than "a student issue" and requires commitment from all stakeholders in the academic community, including undergraduate and postgraduate students, teachers, established researchers, senior managers, policymakers, support staff, and administrators.<sup>3</sup>*

*Plagiarism is submitting someone else's work, ideas, or words as your own, irrespective of your intent to deceive. This means that even unintentional plagiarism through poor notetaking or inattentive referencing may*

- tanja o akademskom integritetu);
- organizuju okrugle stolove i radionice i pri tome poklanjaju pažnju promovisanju načela i vrijednosti akademskog integriteta u zajednici;
- saraduju sa AKOKVO i EK u obukama za članove etičkih odbora i komisija i organizovanju skupova koji će pokriti sve relevantne teme vezane za akademski integritet;
- objavljaju (kroz transparentan rad) izvještaje o rezultatima rada etičkih odbora i komisija i „obmudsmana za akademski integritet“ i unose ih u planove sa aktivnostima za unačređenje u budućnosti;
- edukuju i obučavaju studente o poštovanju vrijednosti akademskog integriteta i promovisanju njegovih načela;
- izrađuju plan integriteta u kojem utvrđuju faktore rizika i predlažu mјere za poboljšanja;
- promovišu načelo nulte tolerancije u slučajevima kršenja ovih načela i vrijednosti;
- i drugo.

## ZAKLJUČAK

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Kao zaključak, vratimo se na početak i, kroz iskustvo sistema sa dugom istorijom uspješno osmišljenog i sprovedenog poštovanja akademskog integriteta, proživimo ovu osjetljivu i krhknu, ali snažnu i odlučnu temu koja oblikuje pojedince i zajednice, jača međusobno povjerenje, poštovanje i pripadanje, ali koja ujedno i podstiče kvalitetnu kulturu zajednice - AKADEMSKI INTEGRITET.

*Prilikom razmatranja akademskog integriteta, rasprava se često vodi oko varanja, plagijarizma, nepoštenja, prevara i drugih akademskih zloupotreba i kako najbolje spriječiti takva ponašanja. Produktivniji pristup podrazumijeva fokus na promovisanje pozitivnih vrijednosti čestitosti, povjerenja, pravičnosti, poštovanja, odgovornosti i hrabrosti (Međunarodni centar za akademski integritet, 2013.) kao interno motivisane pokretače etičke akademske prakse. Akademski integritet mnogo je više od „studentskog pitanja“ i zahtijeva posvećenost svih aktera u akademskoj zajednici, uključujući studente diplomskih i postdiplomske studija, nastavnike, renowirane istraživače, više rukovodioce, kreatore politika, pomoćno osoblje i administratore.<sup>3</sup>*

*Plagijarizam znači podnošenje tuđeg rada, ideja ili riječi kao svojih, bez obzira na vašu namjeru da prevarite. To znači da čak i nenamjerni plagijarizam u vidu loših bilješki ili nepažljivog referenciranja može biti kažnjena.*

3 <https://oxfordre.com/business/view/10.1093/acrefore/9780190224851.001.0001/acrefore-9780190224851-e-147?print=pdf>

3 <https://oxfordre.com/business/view/10.1093/acrefore/9780190224851.001.0001/acrefore-9780190224851-e-147?print=pdf>

*be penalised. Understanding what plagiarism is, and learning techniques to avoid it, is an essential part of your academic training. (Cambridge University, 2019)*<sup>4</sup>

*In a larger sense, academic integrity is the cornerstone of University life and scholarly communities. Professional academics, as in any profession, depend on each other to work with integrity in order to continually advance our understanding of the world through the development and dissemination of knowledge. Every university wants its student body to display academic integrity so that degrees from that university will be valued by employers.*<sup>5</sup>

*You practise academic integrity in your academic writing by working with the five values in mind, and particularly by using correct and accurate referencing. This shows that you can: be accurate in transcribing details; be honest about which ideas were derived from others; act fairly by not taking credit for others' work; take responsibility by finding out what is required of you and how you should carry it out; and show respect for others by acknowledging the part they have played in building your knowledge and understanding. (Reading University, 2019)*<sup>6</sup>

*Razumijevanje šta je plagijarizam i sticanje znanja o tehnikama kako da ga izbjegnete je važan dio vašeg akademskog usavršavanja. (Univerzitet Kembridž, 2019.)*<sup>4</sup>

*U širem smislu, akademski integritet je kamen temeljac univerzitetskog života i naučnih zajednica. Profesionalni akademici, kao i bilo koja profesija, zavise jedni od drugih da rade sa integritetom da bi kontinuirano unapredili naše razumijevanje svijeta kroz razvoj i širenje znanja. Svaki univerzitet želi da njegova studentska organizacija pokaže akademski integritet da bi poslodavci cijenili diplome sa tog univerziteta.*<sup>5</sup>

*Akademski integritet praktično primjenjujete u svom akademskom pisanju, radeći dok na umu imate pet vrijednosti, a posebno upotrebljavajući ispravnu i tačnu referencu. To pokazuje da možete: da budete precizni u prepisivanju detalja, da budete pošteni o tome koje su ideje potekle od drugih, da se ponašate pravedno i ne uzimate zasluge za tuđi rad, da preuzmete odgovornost tako što ćete saznati šta se od vas traži i kako to treba da uradite, i da pokažete poštovanje prema drugima priznajući ulogu koju su odigrali u izgradnji vašeg znanja i razumevanja. (Univerzitet Reding, 2019.)*<sup>6</sup>

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4 <https://www.academic-englishuk.com/academic-integrity>

5 <https://health.yorku.ca/current-student-information/academic-integrity-tutorial/>

6 <https://libguides.reading.ac.uk/academicintegrity/about>

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4 <https://www.academic-englishuk.com/academic-integrity>

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- <https://www.ox.ac.uk/students/academic/guidance/skills/plagiarism?wssl=1>
- <https://www.academicintegrity.org/wp-content/uploads/2017/12/Fundamental-Values-2014.pdf>
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- <https://health.yorku.ca/current-student-information/academic-integrity-tutorial/>
- [https://en.wiktionary.org/wiki/walk\\_the\\_talk](https://en.wiktionary.org/wiki/walk_the_talk)
- [https://enqa.eu/wp-content/uploads/2015/11/ESG\\_2015.pdf](https://enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf)

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- Feasibility study on the proposed tailor-made system(s) for the prevention of plagiarism in Montenegro, Ministry of Education, "Higher Education and Research for Innovation and Competitiveness"- (HERIC), Ref. No. MNE-HERIC-81180-P122785-IC-CS-16-1.2.1.6.
- Zakon o visokom obrazovanju (Sl. list CG", br. 44/2014, 52/2014, 47/2015, 40/2016, 42/2017, 71/2017 i 55/2018)
- Pravila o postupku reakreditacije ustanove visokog obrazovanja (Sl. list CG", br. 44/2014, 52/2014, 47/2015, 40/2016, 42/2017, 71/2017 i 55/2018)
- Strategija razvoja visokog obrazovanja u Crnoj Gori (2016–2020)
- Etički kodeks Univerziteta Crne Gore (2019)

## IZVORI I LITERATURA

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### IZVORI NA INTERNETU:

- <https://www.academicintegrity.org/>
- <https://www.kpk-rs.si/preventiva-in-integriteta/nacrt-integritete/tveganja/>
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## **DEVELOPMENT OF EVALUATION STANDARDS (SUPPLEMENT TO EXISTING RULES FOR RE-ACCREDITATION STANDARDS OF THE AGENCY)**

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### **PROJECT:**

**“HF24 QUALITY EDUCATION FOR ALL – MONTE-  
NEGRO”**

### **STANDARD 11**

BUILDING THE ACADEMIC INTEGRITY MECHANISMS  
AND STRENGTHENING THE INTEGRITY CULTURE

HEI should strive to strengthen the Academic integrity culture among its staff, students, and partners. They should incorporate adequate mechanisms for detection, monitoring, and prevention of any forms of misconduct of academic integrity and include risk management approach in self-evaluation procedures and action plans.

### **GUIDELINES**

Transparency of relevant information, training of all internal stakeholders on the importance of academic integrity, raising awareness, open and clear commitment to the academic integrity principles and values will contribute to raising the quality culture of the HEI and all stakeholders. Monitoring of the state of affairs, detection of threats, and up-to-date response to changes must also be included in the institution's self-evaluation procedures.

### **CRITERIA:**

HEI should establish clear integrity policies that are understandable and acceptable to all internal stakeholders.

HEI should have in place adequate IQA mechanisms and bodies for identifying and addressing the potential risks, for the prevention of misconduct in the field of academic integrity and for the protection of individuals (e.g. ethics commissions, academic integrity ombudsman or similar).

HEI should monitor compliance of operations with the academic integrity principles and values within self-evaluation procedures (e.g. questionnaires for students, teachers, researchers, and other relevant stakeholders).

## **IZRADA STANDARDA ZA EVALUACIJU (DODATAK POSTOJEĆIM PRAVILIMA AGENCIJE ZA STANDARDE REAKREDITACIJE)**

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### **PROJEKAT:**

**„HF24 KVALITETNO OBRAZOVANJE ZA SVE –  
CRNA GORA”**

### **STANDARD 11**

IZGRADNJA MEHANIZAMA AKADEMSKOG INTEGRITA  
TA I JAČANJE KULTURE INTEGRITETA

UVO treba da teže jačanju kulture akademskog integriteta svojih kadrova, studenata i partnera. UVO treba da integrišu odgovarajuće mehanizme za otkrivanje, praćenje i prevenciju svih oblika povrede akademskog integriteta i uključe pristup upravljanja rizikom u postupak samoprocjene i planove aktivnosti.

### **SMJERNICE**

Transparentnost relevantnih informacija, obuka svih internih aktera o značaju akademskog integriteta, podizanje svijesti, otvorena i jasna posvećenost načelima i vrijednostima akademskog integriteta će doprinijeti unapređenju kulture kvaliteta u UVO i kod svih aktera. Praćenje stanja, otkrivanje prijetnji i ažurirani odgovor na promjene moraju takođe biti uključeni u postupak samoevaluacije ustanove.

### **KRITERIJUMI:**

UVO treba da usvoji jasne politike integriteta koje su razumljive i prihvatljive svim internim akterima.

UVO treba da uspostave odgovarajuće mehanizme i tijela za utvrđivanje i rješavanje potencijalnih rizika, za prevenciju zloupotrebe u oblasti akademskog integriteta i za zaštitu pojedinaca (npr. etički odbori, ombudsman za akademski integritet i slično).

u okviru postupka samoevaluacije, UVO treba da prate usklađenost rada sa načelima i vrijednostima akademskog integriteta (npr. upitnici za studente, nastavnike, istraživače i druge relevantne aktere).

HEI should educate and train students and their staff in respecting the values of academic integrity and promote their principles.

HEI should prepare an integrity plan where they identify risk factors and propose measures for improvement (consider the possible and probable course of action, identify list of consequences and prepare an action plan to eliminate the risks).

HEI should promote the principle of zero tolerance in cases of breach of academic principles and values (including plagiarism, fraud, responsible conduct of teaching and learning, and research, gender-based and other forms of harassment, accountability of academic community, etc.).

## SELF-EVALUATION CRITERIA ON ACADEMIC INTEGRITY FOR HIGHER EDUCATION INSTITU- TIONS

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### PROJECT:

**“HF24 QUALITY EDUCATION FOR ALL – MONTE-  
NEGRO”**

## INTRODUCTION

Academic integrity principles (defined by the Law on academic integrity from 2019, No. 01-436/2) are:

1. honesty,
2. objectivity,
3. openness,
4. freedom in teaching and research and
5. responsibility to Academia and Society/Community.

Higher education institutions (HEI) are expected to adapt their organizational scheme by setting up special ethics commissions to deal with issues of academic integrity at the institution. The basis for the operation of a HEI in this field is the identification of priority areas, the development of ethical and professional principles and values that must be respected by higher education teachers and other employees, and students in order to protect and strengthen the dignity and reputation of their institution. An important segment is incorporating integrity into their strategic goals. At the same time, the HEI also formulates procedures in case of violation of these principles. For this purpose, HEI adopts a code of ethics or a comparable document, which represents a common system of evaluation, professional operation, behavior and conduct of all stakeholders.

UVO trebao da edukuju i obuče studente i svoje kadrove o poštovanju vrijednosti akademskog integriteta i da promovišu njegova načela.

UVO treba da izrade plan integriteta u kojem treba da utvrde faktore rizika i predlože mјere za poboljšanja (da razmotre mogući i vjerovatni tok djelovanja, definиšu listu posljedica i pripreme plan aktivnosti za eliminisanje rizika).

UVO treba da promovišu načelo nulte tolerancije u slučajevima povrede akademskih načela i vrijednosti (uključujući plagijarizam, prevaru, odgovorno vođenje procesa nastave, učenja i istraživanja, rodno zasnovano i druge oblike uznemiravanja, odgovornost akademske zajednice, itd.).

## KRITERIJUMI ZA SAMOEVALUA- CIJU O AKADEMSKOM INEGRI- TETU U USTANOVAMA VISOKOG OBRAZOVANJA

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### PROJEKAT:

**„HF24 KVALITETNO OBRAZOVANJE ZA SVE –  
CRNA GORA”**

## UVOD

Načela akademskog integriteta (utvrđena Zakonom o akademskom integritetu iz 2019. godine, br. 01-436/2) su:

1. čestitost,
2. objektivnost,
3. otvorenost,
4. sloboda u nastavi i istraživanju, i
5. odgovornost prema akademskoj zajednici i društvu.

Od ustanova visokog obrazovanja (UVO) se očekuje da prilagode svoju organizacionu šemu na način što će osnovati posebne etičke odbore koje će se baviti pitanjima akademskog integriteta u ustanovi. Osnova za rad UVO u ovoj oblasti je prepoznavanje prioritetnih područja, definisanje etičkih i profesionalnih načela i vrijednosti koje moraju da poštuju nastavnici, zaposleni i studenti visokog obrazovanja da bi se zaštitilo i ojačalo dostojanstvo i reputacija njihove ustanove. Važan segment je ugradnja integriteta u njihove strateške ciljeve. Istovremeno, UVO takođe formulišu postupke u slučaju kršenja ovih načela. U tu svrhu, UVO usvajaju etički kodeks ili sličan dokument, koji predstavlja zajednički sistem evaluacije, profesionalnog rada, vladanja i ponašanja svih aktera.

**The principles of academic integrity and the strengthening of its values do not interfere with the academic and personal freedom of the individual but form an internal value system at the HEI.**

The creation of adequate documents, the establishment of appropriate bodies and mechanisms, the implementation of monitoring procedures and activities represent the beginning of the establishment of integrity at the HEI. A very important factor is, of course, proper information, transparent operation, capacity building and awareness-raising of all parties involved, of management, employees, and students, but also of external partners and the general public. Respecting, understanding, honoring, acting and functioning in accordance with the principles and values of integrity means living in accordance with them. Not only when external mechanisms are in place to control, supervise and set sanctions in cases of violation, but also then, „when no one is watching“.

**“Integrity is doing the right thing, even if no one is watching”**  
Quote by C.S. Lewis

This short, yet powerful and meaningful quote describes the essence of the concept of integrity and it applies also to academic integrity.

**The responsibility for safeguarding integrity lies within the HEIs and its academic society.**

**This document shall not be perceived as a technical guide for the preparation of self-evaluation on academic integrity but rather as a set of guidelines that could encourage HEIs to create an effective self-evaluation system in which also the aspect of academic integrity and integrity as such is included, taking into account their specifics and uniqueness.**

Like other stakeholders in HE (the Ministry, responsible for Higher Education, AKOKVO, Anti-Corruption Agency, the Ethics Committee ...) HEIs, their employees and partners, and last but not least, students must follow basic principles that raise awareness and emphasize the importance of respecting the values of academic integrity, through:

- leading by example (every individual in the academic community is responsible for implementing the principles and protecting the values of integrity, to act honorably)
- honor transparency (in procedures and in action)
- walk the talk (academic integrity standards should be part of HEI's quality culture and HEI's management are responsible for safeguarding these principles)
- practice zero tolerance (for any form of

**Načela akademskog integriteta i jačanje njegovih vrijednosti ne predstavljaju miješanje u akademske i lične slobode pojedinca, već se njima uspostavlja interni sistem vrijednosti na nivou UVO.**

Izrada odgovarajućih dokumenata, formiranje odgovarajućih tijela i mehanizama, sprovođenje postupka praćenja i sprovodenje aktivnosti predstavljaju početak uspostavljanja integriteta na UVO. Veoma važan faktor su, naravno, odgovarajuće informacije, transparentan rad, jačanje kapaciteta i podizanje svijesti svih uključenih strana, menadžmenta, zaposlenih i studenata, ali i eksternih partnera i šire javnosti. Poštovanje, razumijevanje, uvažavanje, postupanje i funkcionisanje u skladu sa načelima i vrijednostima integriteta znači živjeti u skladu sa njima. Ne samo kada su uspostavljeni eksterni mehanizmi kontrole, nadzora i izricanja sankcija u slučajevima kršenja, nego i „kada niko ne gleda“.

**„Integritet znači raditi ispravnu stvar, čak i kada niko ne gleda“**  
Citat C.S. Lewisa

Ovaj kratak, ali snažan citat opisuje samu suštinu koncepta integriteta, a odnosi se i na akademski integritet.

**Odgovornost za zaštitu integriteta je na UVO i njenoj akademskoj zajednici.**

Ovaj dokument ne treba doživljavati kao tehnički priručnik za pripremu samoevaluacije o akademskom integritetu, već kao skup smjernica koje bi mogle da podstaknu UVO da kreiraju djetotvoran sistem samoevaluacije koji obuhvata i aspekte akademskog integriteta i integriteta kao takvog, uzimajući pritom u obzir njihove specifičnosti i jedinstvenosti.

Kao i drugi akteri u VO (ministarstvo nadležno za visoko obrazovanje, AKOKVO, Agencija za sprječavanje korupcije, Etički komitet...), UVO, njihovi kadrovi i partneri, i na kraju, ali ne najmanje važni, studenti moraju da slijede osnovna načela koji podižu svijest i naglašavaju značaj poštovanja vrijednosti akademskog integriteta, tako što će:

- voditi svojim primjerom (svaki pojedinac u akademskoj zajednici je odgovoran za primjenu načela i zaštitu vrijednosti integriteta, odgovoran da postupa časno)
- poštovati transparentnost (u procedurama i aktivnostima)
- praktikovati ono što zagovaraju (standardi akademskog integriteta treba da budu dio kulture kvaliteta u UVO i ménđzment UVO je odgovoran za zaštitu tih načela)
- pokazivati nultu toleranciju (za sve oblike kršenja ili nepoštovanja načela akadem-

- breach or misconduct of academic integrity principles and values)
- cooperate and educate (capacity building, offering support and guidance, advisory role).

When talking about safeguarding the academic integrity HEIs shall not only chase the compliance with pre-described standards and criteria but rather focus on its full implementation, enhancement, and on strengthening their quality culture.

Just as it is important that institutions have appropriate mechanisms and platforms in place to check all forms of plagiarism, prevent abuse and sanction infringements, verify identity and prevent fraud in examinations and assignments, it is important that they also set up appropriate mechanisms to assist, promote and educate all internal stakeholders, help raising awareness, empowering, as well as protecting those who report illicit activity and abuses (whistleblowers).

When focusing only on the narrow field of understanding this concept, it is most often associated with various forms of plagiarism such as:

- inaccurate citation
- plagiarism (intellectual theft)
- self-plagiarism (reuse)
- misleading citation, fabrication, falsification
- author submission violation
- inaccurate authorship (inaccurate or insufficient list of authors)
- copy and paste intellectual theft
- intellectual stealing (taking work of another author and submitting it under different name).

This represents only a minor aspect of the violation of the principles and values of academic integrity. It is the responsibility of HEIs to identify such and other relevant cases, address violators and take appropriate measures to prevent them.

In the process of self-evaluation on academic integrity, two ways of action can be identified, namely:

1. in the form of detecting and responding to identified violations and establishing measures for their prevention, or
2. in the form of proactive and transparent action and participation of all key stakeholders (motivation, training, promotion, awareness-raising, identification of good practices, and proper communication).

The first is an approach based on embedded control mechanisms, monitoring and on re-action, while the second one is based on action, assessment, integrated self-evaluation mechanisms, improvement, building trust and empowerment. The introduction of good practices and innovations as well as strengthening the quality culture can be expected especially in the latter, however, it is important that both approaches

- skog integriteta)
- sarađivati i edukovati (izgradnja kapacita, pružanje podrške i smjernica, savjetodavna uloga).

Kada je riječ o zaštiti akademskog integriteta, UVO su obavezne ne samo da insistiraju na poštovanju prethodno utvrđenih standarda i kriterijuma, već i da se fokusiraju na njegovu potpunu primjenu, kao i na unapređenje i jačanje svoje kulture kvaliteta.

Koliko je važno da ustanove usvoje odgovarajuće mehanizme i platforme za provjeru svih vrsta plagijata, sprječavanje zloupotrebe i kažnjavanje kršenja, provjeru identiteta i sprječavanje prevara na ispitim i zadatacima, jednako je važno da uspostave i odgovarajuće mehanizme za pomoć, promovisanje i edukovanje sve internih aktera, pomoći u podizanju svijesti, osnaživanju i zaštiti onih koji prijavljaju nelegalnu aktivnost i zloupotrebe (zviždači).

Kada je pažnja sumjerena samo na usko razumijevanje ovog koncepta, onda se on najčešće povezuje sa različitim oblicima plagijarizma, kao što su:

- netačno citiranje
- plagijarizam (intelektualna krađa)
- samoplagijarizam (ponovno korišćenje)
- citati koji vode na pogrešan zaključak, izmišljotine, falsifikati
- povreda pravila podnošenja rada za objavljivanje
- netačno autorstvo (netačna ili nedovoljna lista autora)
- intelektualna krađa putem kopiranja
- intelektualna krađa (uzimanje rada drugog autora i podnošenje pod drugim imenom).

Navedeno predstavlja samo manji aspekt kršenja načela i vrijednosti akademskog integriteta. UVO su odgovorne da prepoznaju takve i druge relevantne slučajeve, da se suoče sa počiniocima i preduzmu odgovarajuće mјere da ih sprječe.

U postupku samoevaluacije akademskog integriteta mogu se prepoznati dva pravca djelovanja, i to:

1. otkrivanje i reagovanje na utvrđena kršenja i definisanje mјera za njihovo sprječavanje, ili
2. proaktivno i transparentno djelovanje i učešće svih aktera (motivisanje, obuka, promovisanje, podizanje svijesti, prepoznavanje dobre prakse, i odgovarajuća komunikacija).

Prvi pristup se zasniva na prihvaćenim mehanizmima kontrole, praćenja i ponovnog djelovanja, dok se drugi zasniva na djelovanju, procjeni, integrisanim mehanizmima samoevaluacije, poboljšanju, izgradnji povjerenja i osnaživanju. Uvođenje dobrih praksi i inovacija, kao i jačanje kulture kvaliteta, može se očekivati posebno u okviru drugog pristupa. Međutim, važno je da oba pristupa u određenoj mjeri budu zastupljeni.

are introduced into the institution's self-evaluation system in a certain ratio. The balance between them must be adjusted to the actual situation at the HEI. If the initially perceived challenge is mainly related to a number of breaches of academic integrity, the action at this stage relates more to identifying misconduct and identifying mechanisms to prevent them, while still focusing on empowering and raising awareness, on appropriate communication and promotion of academic values. When the proportion of infringements is reduced, as a result of the measures implemented, it is important to strengthen the second approach of promoting, empowering, motivating stakeholders with principles and values, also through identifying and rewarding good practices. Rewarding does not only mean the use of financial incentives, but also other forms, such as public recognition of achievements, staff promotions, recognition of credentials for students, and other forms of incentives.

The national and global positioning of a HEI depends primarily on a positive or negative perception and respect for the principles and values of academic integrity, which determines its reputation. With the massification of studies and the expansion/accessibility of HE, there are consequently more providers of this type of education every day, and with the use of modern technologies, providers are not limited to one area, one country, or on only a certain number of students. The expansion of the HE market place attracts providers who are looking for their opportunities due to various motives, so the number of perceived violations of academic integrity and diploma mills is also increasing. In this vibrant time and space, it is therefore important to maintain the dignity, integrity, honesty, accountability and reputation that separates trusted providers from non-trusted.

The principles and values of academic integrity are also related to integrity, such as responsible conduct of individuals and communities, fair and equal treatment of individuals, professional conduct, respect for high moral standards of society and community, prevention of abuse and avoidance of conflicts of interest and illicit influences (protectionism, lobbying, pressure or blackmail, bribes, and corruption), and last but not least, moral and honorable conduct of each individual.

At that point, the self-evaluation procedures align with the integrity plan, that each HEIs in Montenegro should perform according to the Montenegrin Strategy of HE until 2025.

As academic integrity is a concept that can be defined more or less comprehensively within diverse educational environments, it is the responsibility of HEIs to identify this spectrum of challenges specific to their environment and community through self-evaluation processes and to address and implement them through appropriate activities and operations.

na u sistemu samoevaluacije ustanove. Ravnoteža između njih mora biti prilagođena stvarnoj situaciji na UVO. Ako se početni izazov uglavnom odnosi na broj kršenja akademskog integriteta, djelovanje u ovoj fazi odnosi se više na utvrđivanje neprimjerenog ponašanja i pronalaženje mehanizama za njihovo sprječavanje, uz istovremeno fokusiranje na osnaživanje i podizanje svijesti, na odgovarajuću komunikaciju i promovisanje akademskih vrijednosti. Nakon smanjenja broja povreda, zbog sprovedenih mjera, važno je ojačati drugi pristup promovisanja, osnaživanja, motivisanja aktera o načelima i vrijednostima, između ostalog i kroz prepoznavanje i nagrađivanje dobre prakse. Nagrađivanje ne znači samo korišćenje finansijskih podsticaja, već i druge oblike nagrađivanja, kao što su javno priznanje postignuća, napredovanje zaposlenih, priznanje studentskih sertifikata i drugi oblici podsticaja.

Nacionalno i globalno pozicioniranje UVO prvenstveno zavisi od pozitivne ili negativne percepcije i poštovanju načela i vrijednosti akademskog integriteta, što određuje njenu reputaciju. Kao posljedica masovnosti studija i proširivanja/pristupačnosti VO, svakim danom je sve više organizatora ove vrste obrazovanja, a uz korišćenje modernih tehnologija organizatori nijesu ograničeni na jedno područje, jednu zemlju ili samo na određeni broj studenata. Širenje tržišta VO privlači organizatore tog obrazovanja koji zbog različitih motiva traže svoju priliku, pa se time povećava i broj prepoznatih kršenja akademskog integriteta i fabrika diploma. Zbog toga je u ovom dinamičnom vremenu i prostoru važno očuvati dostojanstvo, integritet, čestitost, odgovornost i ugled koji odvajaju pouzdane organizatora obrazovanja od onih koji to nijesu.

Načela i vrijednosti akademskog integriteta su takođe povezani sa integritetom, kao što je odgovorno ponašanje pojedinaca i zajednica, pravedan i jednak odnos prema pojedincima, profesionalno ponašanje, poštovanje visokih moralnih standarda društva i zajednice, sprječavanje zupotrebe i izbjegavanja sukoba interesa i nezakonitih uticaja (protekcionizam, lobiranje, pritisak ili ucjenjivanje, mito i korupcija) i na kraju, ali ne i najmanje važno, moralno i časno ponašanje svakog pojedinca.

U tom trenutku, postupak samoevaluacije usklađuju se sa planom integriteta, koji bi sve UVO u Crnoj Gori trebalo da sprovode u skladu sa Strategijom razvoja VO u Crnoj Gori do 2025. godine.

Pošto je akademski integritet koncept koji se može definisati više ili manje sveobuhvatno u različitim obrazovnim okruženjima, UVO su odgovorne da prepoznuju ovaj spektar izazova karakterističnih za njihovo okruženje i zajednicu kroz proces samoevaluacije, da nađu i primijene rješenja za te izazove kroz odgovarajuće aktivnosti i poslove.

## PRINCIPLES

Each HEI is autonomous and responsible for the quality of its operations, of its internal quality system and outcomes.

Self-evaluation is a basic process, established at the HEI to promote the fundamental values and principles of assessment and enhancement activities, contribute fostering and strengthening the quality culture, that includes also, but not exclusively, the retrospective for the past, progress made and recommended improvements. Self-evaluation is a procedure to systematically monitor, evaluate and improve HEI's own professional activities and its results in order to stabilize or improve it. This can take place on an individual and/or on an organizational level.

The internal quality assurance (IQA) system comprises clear, unambiguous, and verifiable aims and objectives, procedures to safeguard quality, integrity and quality culture, periodic self-evaluations, and systematic monitoring of improvements. Quality culture refers to a distinct and manifested vision and mission, a shared focus on improvements, leadership, accountability, transparency, soft approach, cooperation, professionalism, student commitment, and external orientation.

IQA and EQA system must also build on promoting the autonomy of HEIs and building mutual trust. In the Analysis of the quality assurance system in higher education and the Law on Academic Integrity (Council of Europe, may 2020), focusing on EQA perspective on academic integrity and actions to strengthen the quality culture in this field, some improvements have been identified also for IQA systems, namely it is advised that HEIs should:

- primarily take care of adequate and up-to-date information and education in this field;
- establish clear policies that are understandable and acceptable to all internal stakeholders;
- set up (optional) an instrument of the „academic integrity ombudsman“ at the institution, whose task is to educate the academic community, promote principles and values among students and staff, to guard the academic integrity and to identify any forms of violations, misconducts, and inconsistencies. This institute can be introduced regardless of the existence of ethics commissions at HEI, it is only necessary to pay attention not to overlap the responsibilities among them. The accountability of the ombudsman is to become the guardian of academic integrity and to monitor the implementation of the principles and values of academic integrity at HEI and in the academic community. His findings, opinions, and initiatives for improvement should be elaborated in a public report. It should have the legitimacy to propose matters (related to academic integrity) to the ethics

## NAČELA

Svaka UVO je samostalna i odgovorna za kvalitet svog rada, za svoj interni sistem kvaliteta i rezultate.

Samoevaluacija je osnovni proces, koji se uvodi na UVO u cilju promovisanja osnovnih vrijednosti i načela aktivnosti procjene i unapređenja, davanja doprinosa njegovanju i jačanju kulture kvaliteta, što između ostalog obuhvata analizu prošlog rada, ostvarenog napretka i preporučena poboljšanja. Samoevaluacija je postupak čiji je cilj sistematsko praćenje, ocjenjivanje i poboljšanje profesionalnih aktivnosti UVO i njenih rezultata u cilju njene stabilizacije ili unapređenja. što se može odvijati na pojedinačnom i/ili na organizacionom nivou.

Sistem unutrašnjeg obezbjeđenja kvaliteta (UOK) obuhvata jasne i nedvosmislene, pojedinačne i opšte ciljeve koje je moguće potvrditi, postupke za zaštitu kvaliteta, integriteta i kulture kvaliteta, periodične samoevaluacije i sistematsko praćenje poboljšanja. Kultura kvaliteta se odnosi na prepoznatljivu i dokazanu viziju i misiju, zajednički fokus na poboljšanja, liderstvo, odgovornost, transparentnost, meki pristup, saradnju, profesionalizam, posvećenost studenata i spolašnju orientaciju.

Sistem UOK i EOK se mora graditi i na promovisanju autonomije UVO i izgradnji uzajamnog povjerenja. U Analizi sistema obezbjeđenja kvaliteta u visokom obrazovanju i Zakona o akademskom integritetu (Savjet Evrope, maj 2020. godine), koja se fokusira na akademski integritet iz ugla EOK i aktivnostima za jačanje kulture kvaliteta u ovoj oblasti, prepoznata su i određena poboljšanja za sisteme IOK. Naime, preporučuje se da UVO treba da:

- prvenstveno vode računa o odgovarajućem i ažuriranom informisanju i edukaciji u ovoj oblasti;
- utvrđuju jasne politike koje su razumljive i prihvatljive svim internim akterima;
- uvode (opciono) u ustanovu instrument „ombudsmana akademskog integriteta“, čiji je zadatak da edukuje akademsku zajednicu, promoviše načela i vrijednosti među studenstvima i zaposlenima, čuva akademski integritet i utvrđi sve vrste povreda, neprimjerenog poнаšanja i nedosljednosti. Ovaj institut se može uvesti bez obzira na postojanje etičkih odbora na UVO, samo je potrebno obratiti pažnju na moguće dupliranje poslova i nadležnosti među njima. Odgovornost ombudsmana je da postane čuvan akademskog integriteta i da prati primjenu načela i vrijednosti akademskog integriteta na UVO i u akademskoj zajednici. Njegovi zaključci, mišljenja i inicijative za poboljšanje treba da budu razrađena u javnom izvještaju. Ombudsman treba da ima legitimitet da predlaže pitanja (koja se odnose na akademski integritet) etičkim odborima ili menadžmentu UVO na sopstvenu inicijati-

- commissions or to the HEI management on his own initiative or on the initiative of a third party (students, teachers). The findings and suggestions for improvement highlighted in his report shall also be addressed in the institution's self-evaluation procedures;
- monitor compliance of operations with the academic integrity principles and values within self-evaluation procedures (example: questionnaires for students, teachers, and staff also include questions on academic integrity, equal treatment, illicit influences, conflict of interests, ...);
  - organize round tables and workshops and doing so taking care of promotion of the principles and values of academic integrity in the community;
  - cooperate with AKOKVO and the Ethics Committee (and other relevant stakeholders) in training members of ethics commissions and in organizing events covering all relevant topics of academic integrity;
  - publish (transparent operation) reports on the results of the work of ethics commissions and of the „academic integrity ombudsman“ and include them in the plans of improvement activities for the future;
  - educate and train students in respecting the values of academic integrity, promote its principles and follow their progress;
  - prepare an integrity plan where they identify risk factors, propose measures for improvement and include findings into their self-evaluation;
  - promote the principle of zero tolerance in cases of breach of these principles and values;
  - and more.

These recommendations are taking into account the soft approach, honoring HEIs autonomy and responsibility to take proper action also in their self-evaluation procedures to address the issues of academic integrity and integrity as such.

## **CRITERIA FOR SELF-EVALUATION on academic integrity**

Taking the above mentioned into consideration, HEIs should demonstrate that they:

1. established clear integrity policies that are understandable and acceptable to all internal stakeholders,
2. include all relevant stakeholders into their self-evaluation procedures and activities,
3. ensure that all relevant stakeholders are familiar with the self-evaluation findings and that

vu ili na inicijativu treće strane (studenti, nastavnici). Zaključci i prijedlozi za poboljšanja na koje bude ukazano u njegovom izvještaju će se isto tako razmatrati tokom postupka samoevaluacije ustanove;

- u okviru postupka samoevaluacije prate usklađenost rada sa načelima i vrijednostima akademskog integriteta (primjer: upitnici za studente, nastavnike i zaposlene sadrže i pitanja o akademskom integritetu, jednakom tretmanu, nezakonitim uticajima, sukobu interesa...);
- organizuju okrugle stolove i radionice i pri tome poklanjaju pažnju promovisanju načela i vrijednosti akademskog integriteta u zajednicu;
- sarađuju sa AKOKVO i Etičkim komitetom (i drugim relevantnim akterima) u obukama za članove etičkih odbora i organizovanju skupova koji će pokriti sve relevantne teme vezane za akademski integritet;
- objavljaju (kroz transparentan rad) izvještaje o rezultatima rada etičkih odbora i „obmudsmana za akademski integritet“ i unose ih u planove sa aktivnostima za unapređenje u budućnosti;
- edukuju i obučavaju studente o poštovanju vrijednosti akademskog integriteta, promovisanju njegovih načela i praćenju svog napretka;
- izrađuju plan integriteta u kojem utvrđuju faktore rizika, predlažu mјere za poboljšanja i zaključke unose u svoju samoevaluaciju;
- promovišu načelo nulte tolerancije u slučajevima kršenja ovih načela i vrijednosti;
- i drugo.

Ove preporuke uzimaju u obzir meki pristup, poštujući autonomiju i odgovornost UVO da preduzmu odgovarajuće mјere u svojim postupcima samoevaluacije i da se na taj način bave pitanjem akademskog integriteta i integriteta kao takvog.

## **KRITERIJUMI ZA SAMOEVALUACIJU o akademskom integritetu**

Imajući u vidu gore navedeno, UVO treba da pokažu da su:

1. usvojile jasne politike integriteta koje su razumljive i prihvatljive svim internim akterima,
2. uključile sve relevantne aktere u svoj postupak samoevaluacije i svoje aktivnosti,
3. obezbijedile da su svi relevantni akteri upoznati sa zaključcima samoevaluacije i sa činjenicom da imaju mogućnost da predlože mјere

- they have the possibility to propose measures for improvement,
- 4. have appropriate mechanisms in place to identify, monitor and strengthen the level of (academic) integrity,
- 5. implement adequate measures to empower and support all internal stakeholders,
- 6. use anti-plagiarism software and other methods and tools to prevent misconduct of academic integrity,
- 7. assure adequate methods and mechanisms for student identity confirmation at exams and other forms of student assessment,
- 8. ensure equal treatment and protection of whistleblowers,
- 9. advance in the search for truth and knowledge through the intellectual and personal honesty of teaching, learning, research and services,
- 10. promote and rely on integrity in an atmosphere of mutual trust,
- 11. establish clear and transparent expectations, standards and practices to support fairness in the interactions of students, teachers and other staff,
- 12. respect, honor and value diverse opinions and ideas.

Honesty, trust, accountability and respect should be at the core of HEIs operation, of teaching and learning, research, and service. It is essential that academic policies and community practices send a clear message that falsification of data, lying, cheating, fraud, theft, and other dishonest behaviors are unacceptable.

What should be considered important in the self-evaluation on academic integrity? Few relevant topics:

1. adequate training and awareness of teachers, researchers, staff and students (capacity building),
2. the level of threat to academic integrity shall be examined and adequate measures are implemented on the basis of the findings (SWOT analysis, PDCA cycle),
3. additional mechanisms shall be provided to enable the detection and timely prevention of abuses and breaches of integrity,
4. cooperation with external stakeholders and transfer of good practices (benchmarking),
5. the topic of integrity is also included in self-evaluation procedures and monitoring methods (questionnaires for teachers, management, staff, students and external partners), in order to identify the actual state of affairs and to suggest the most appropriate recommendations for improvements at the systemic and at individual level,
6. the level of awareness and acceptance of the principles and values of academic integrity at the HEI,
7. number of events related to capacity building in the field of integrity, expected impact and identified outcomes,

- za poboljšanja,
- 4. usvojile odgovarajuće mehanizme za određivanje, praćenje i jačanje nivoa (akademskog integriteta),
- 5. sprovele odgovarajuće mjere za osnaživanje i podršku svim internim akterima,
- 6. uvele korišćenje softvera za prepoznavanje plagijata i druge metode i instrumente u cilju sprječavanja kršenja akademskog integriteta,
- 7. obezbijedile odgovarajuće metode i mehanizme za potvrdu identiteta studenata na ispitiima i drugim oblicima procjene znanja studenata,
- 8. obezbijedile jednak tretman i zaštitu zviždača,
- 9. ostvarile napredak u potrazi za istinom i znanjem kroz intelektualnu i ličnu čestitost u nastavi, učenju, istraživanju i uslugama,
- 10. promovisale i oslonile se na integritet u atmosferu uzajamnog povjerenja,
- 11. utvrdile jasna i transparentna očekivanja, standarde i prakse kao podršku pravednosti u interakciji studenata, nastavnika i drugog osoblja,
- 12. uspostavile poštovanje, uvažavanje i vrednovanje različitog mišljenja i različitih ideja.

Čestitost, povjerenje, odgovornost i poštovanje treba da zauzimaju centralno mjesto u radu UVU, u nastavi i učenju, istraživanjima i uslugama. Od ključnog je značaja da akademske politike i prakse u zajednici pošalju jasnu poruku da su falsifikovanje podataka, laganje, varanje, prevara, krađa i druga nepoštena ponašanja neprihvatljiva.

Šta treba smatrati bitnim u samoevaluaciji akademskog integriteta? Nekoliko je tema od značaja:

1. odgovarajuća obuka i svijest nastavnika, istraživača, osoblja i studenata (izgradnja kapaciteta),
2. ispitivanje nivoa prijetnje akademskom integritetu i sprovođenje odgovarajućih mjer na osnovu zaključaka (SWOT analiza, ciklus PDCA),
3. utvrđivanje dodatnih mehanizama u cilju otkrivanja i blagovremenog sprječavanja zloupotrebe i povrede integriteta,
4. saradnja sa eksternim akterima i prenos dobre prakse (utvrđivanje mjerila),
5. tema integriteta je takođe uključena u postupak samoevaluacije i metode praćenja (upitnici za nastavnike, menadžment, osoblje, studente i spoljašnje partnere) u cilju utvrđivanja stvarne situacije i predlaganja najboljih preporuka za poboljšanja na sistemskom i na individualnom nivou,
6. nivo svijesti i prihvatanja načela i vrijednosti akademskog integriteta u UVU,
7. broj događaja povezanih sa izgradnjom kapaciteta u oblasti integriteta, očekivani uticaj i utvrđeni rezultati,

8. number of reported cases, analysis of decision-making in these cases and protection of whistleblowers,
9. operation and effectiveness of services and assistance provided to strengthen academic integrity and integrity as such (operation of ethics commissions, analysis of their work, public disclosure of data and public discussion on findings, operation of other potential bodies - academic integrity ombudsman, professional advisers in the field of (academic) integrity...).

Each HEI must take into account its own peculiarities and design self-evaluation procedures that fit their purpose and expected outcomes. Therefore, they are encouraged to identify qualitative and quantitative indicators that are suitable to monitor the achievement of academic integrity goals and outputs.

Self-evaluation results and findings that address the issue of academic integrity at HEI should also be properly communicated with all stakeholders. This means that the institution must plan adequate dissemination activities and therefore use the most appropriate communication channels.

8. broj prijavljenih slučajeva, analiza odlučivanja u tim slučajevima i zaštita zviždača,
9. rad i djelotvornost usluga i pomoći na jačanju akademskog integriteta i integriteta kao takvog (rad etičkih odbora, analiza njihovog rada, javno objavljanje podataka i javna rasprava o zaključcima, rad drugih mogućih tijela - ombudsman za akademski integritet, profesionalni savjetnici u oblasti (akademskog) integriteta ...).

Svaka UVO mora da uzme u obzir svoje specifičnosti i da osmisli postupak samoevaluacije koji odgovara svrsi i očekivanim rezultatima. Stoga se UVO podstiču da utvrde kvalitativne i kvantitativne pokazatelje koji će moći da se koriste za praćenje postizanja ciljeva i rezultata akademskog integriteta.

Rezultati i zaključci samoevaluacije koji se bave pitanjem akademskog integriteta na UVO treba takođe na odgovarajući način da budu saopšteni svim akterima. To znači da ustanova mora da isplanira odgovarajuće aktivnosti informisanja i da za te potrebe koristi najprikladnije kanale komunikacije.



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