INTEGRITY IN THE USE OF HUMAN AND FINANCIAL RESOURCES IN EDUCATION

A cross-country synthesis of findings from locally-led INTES assessments in Georgia, Kyrgyzstan, Moldova, and Mongolia

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Executive summary

Research background

This synthesis report was prepared in the framework of the project Integrity of education systems (INTES): training for civil society organisations. The project was carried out by the Center for Applied Policy and Integrity and the Network of Education Policy Centres (NEPC) in 2019-2020 in partnership with civil society organisations – members of NEPC from Georgia, Kyrgyzstan, Moldova, and Mongolia, with the support of the Open Society Foundations (Education Support Program).

The report summarises key findings from locally-led integrity assessments, which were guided by two questions: do participants in school education in Georgia, Kyrgyzstan, Moldova, and Mongolia engage in practices that lead to the abuse of human and financial resources in education and if yes, what are the mechanisms and systemic weaknesses that facilitate and motivate such conduct?
In Georgia and Moldova the integrity assessments focused on the management of human resources in education, while in Kyrgyzstan and Mongolia the reports analysed the integrity of using funds from private sources in the form of parental donations to public education providers. Specifically, we focused on two of the nine integrity violations described in the 2019 update of the INTES typology of integrity violations in education: favouritism in staffing decisions in Georgia and Moldova, and misappropriation of funds in education) in Kyrgyzstan and Mongolia.

Favouritism was thereby understood to be the redistribution of public resources in education in the form of employment contracts, employment-related promotions, and benefits in favour of relations, friends, colleagues, or people who are otherwise close to those in charge of the staffing decisions. Misappropriation of resources on the other hand was defined as the embezzlement of assets in education by individuals who do not own them but are entrusted with their management and/or control.

Abuse of human resources in education: favouritism in Georgia and Moldova

Manifestations

Favouritism can influence decisions at any stage of the career path of professional staff in education, from the moment of their recruitment ad first time appointment, through decisions affecting their career development and working conditions, to matters concerning dismissal or retirement. In Georgia and Moldova, favouritism seems to be most prevalent at the point of entry to the teaching profession, but there are also instances in which favouritism was targeting teachers who were already in the profession, i.e. through decisions about the distribution of workplace advantages and the outcomes of teacher appraisals, which were subject to undue influence in favour of relatives, friends or political affiliates.

In both countries the national researchers recorded cases of teacher appointment in exchange for bribes and intentional disregard for minimum qualification requirements for new teachers (hiring

candidates with less than the minimum qualifications required by law). These two manifestations are discussed in the next sections of this chapter. Yet, a number of manifestations of favouritism were country-specific and linked to persisting education policy weaknesses in each of the two countries. For instance, in Moldova it is not uncommon for school leaders to abuse the performance evaluation of teachers to provide or deny access to work-related benefits and career development opportunities. Also in Moldova, preferential treatment of some teachers over others with respect to more favourable distribution of working hours, additional pay, or opportunities for professional development seems to be widespread.

In Georgia on the other hand, the national report described cases in which otherwise well-defined, but difficult to implement recruitment processes were subverted through "mock" compliance with procedural requirements in order to eliminate applicants in favour of candidates who were chosen "in advance". In Georgia there were also cases of undue, politically motivated external influence on the appointment decisions to be taken by school principals.

Policy vulnerabilities that lead to favouritism

Despite their obviously different development trajectories and policy solutions, Moldova and Georgia seem to share a range of such shortcomings in teacher policy, which create integrity vulnerabilities by fueling stakeholder distrust in the ability of schools and universities to deliver to expectations in legitimate ways. Some of them are long-standing and may never have been properly addressed, while others seem to have been caused by recent policy changes.

One of the major sources of integrity vulnerabilities are teacher shortages in both countries, which are forcing many school principals to bend or break the rules of recruitment to fill the vacancies and prevent the collapse of provision in their schools, for instance by disregarding the minimum qualification requirements for a teaching job.

A further policy weakness is the missing or unworkable recruitment procedures for new teachers. This shortcoming hinders compliance and opens the door to various forms of undue influence on appointment decisions.

Finally, there is ample amount of distrust in the formal credentials of candidates for teaching. In both countries, the principals of elite and ordinary schools alike tend to rely on prior, informal knowledge of candidates when selecting whom to recommend for hire. This suggests the presence of a problem with the credibility of formal credentials of teachers and candidates for teaching, so that trust is being replaced by informal substitutes based on acquaintanceship. From this point of view, favouritism is not just a way of securing a job at the expense of others or investing in a payback later. It is an effective remedy for deficiencies in the quality assurance of teaching and teacher training.

Abuse of financial resources: parental donations in Kyrgyzstan and Mongolia

Manifestations

In both counties that covered this topic in their national INTES research – Kyrgyzstan and Mongolia – parental donations are permissible and, in some way, even desirable practice as most public

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schools are forced to operate in conditions of high stakeholder expectations and stagnating public spending on education. The primary evidence collected for this research shows that, indeed, there is no reason to treat parental donations per se as an illicit practice. The integrity problem is rather that they are not protected by proper safeguards although they account for a considerable share of the operational funding of schools, and that they are consequentially being instrumentalised for a range of other integrity violations.

In Mongolia, for example, parents are being extorted to donate to schools and individual teachers under the pretext of supplementary tutoring and day-care services after the (excessively short) school day is over, which in 75% of the recorded cases are provided by teachers from the same school. These "donations" are habitually treated as an informal condition for admission or denial of access to schools. Schools may also offer enrichment and remedial lessons to their students for fee after (or in-between) regular classes. These lessons are optional, but parents are expected to donate to the school by enrolling their children and paying extra for the purchase of the additional learning materials used in these lessons. Some of the evidence also suggests that schools may fundraise with parents in view of committing procurement fraud with the help of the parental donations.

In Kyrgyzstan, the significance of parental donations as an enabling factor for integrity violations is even greater, at least in terms of the diversity of consequential violations recorded in the evidence collection. Like in Mongolia, schools may request "voluntary" parental donations as condition for admission. There is also abundant anecdotal evidence of cases in which students whose families refused to (or could not) pay a donation, were treated worse than the children of paying parents, for instance by lowering their grades. Finally, there is evidence that authorities in Kyrgyzstan are using parental donations as a pretext to replace school principals with political affiliates, especially in schools rich in donations, by accusing them of misappropriation of funds.

Policy vulnerabilities that lead to abuse

The national INTES reports provide an abundance of observations and data which point towards a rather precise set of policy vulnerabilities that promote the misuse of parental donations for integrity violations. For instance, the abuse of donations for illicit access to education in Mongolia can be traced back to concealed school enrolment capacity shortages after a rapid expansion of enrolment due to reforms for promoting universal access to education. Data suggests that the reform itself was a success, but that this was achieved by allowing for multiple, excessively short school shifts. In addition, decisions about opening of new schools are highly politicized and do not take into consideration local enrolment needs.

In comparison, in Kyrgyzstan the driver of misuse of donations for illicit access is the absence of reliable data on school performance, which leads to the proliferation of perceptions that some schools are much better than others. The national report suggests that there are too few schools which are perceived as being of good quality, which creates competition for places in such schools and provides their principals and the parents of prospective students with a matching set of incentives to agree about the need for "voluntary" donations in exchange for admission. The integrity violation is facilitated further by the absence of clarity about admission procedures and the lack of sanctions for bypassing them. Finally, in both countries parental donations are not regulated properly and there are no adequate safeguards in the form of accountability and transparency arrangements concerning their collection and use.

Pointers for action

The national reports offer a wealth of guidance for action which is country-specific but features elements of significance in cross-country perspective because it describes ways of creating shared responsibility for integrity among stakeholders on the grassroot level. The synthesis report organises these recommendations in 8 points for action, as follows:

- *Recommendation 1: Introduce structural changes to address resource shortages*
- *Recommendation 2: Invest in trust-building measures with the help of quality assurance reforms*
- *Recommendation 3: Increase autonomy in exchange for greater accountability*
- *Recommendation 4: Depoliticize decision-making processes by promoting transparency through media involvement*
- *Recommendation 5: Address the shadow provision of services by improving the conflict of interest regulations*
- *Recommendation 6: Encourage and protect whistleblowers*
- *Recommendation 7: Strengthen participatory governance*
- *Recommendation 8: Promote a culture of integrity on the level of education providers*

Overall, the purpose of this INTES research is not to cast blame, but to deliver evidence and insights which can facilitate and guide subsequent action by identifying areas of education policy and practice in need of improvement, both for the sake of integrity and for the sake of progress towards better, more equitable and inclusive education. Efforts to prevent illicit conduct will depend on how well they address the underlying policy problems in the areas of teacher and financial resource management.

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Chapter 1. Introduction

1.1 Research background

This report was prepared within the framework of the project Integrity of education systems: training for civil society organisations, which was carried out by the Center for Applied Policy and Integrity and the Network of Education Policy Centers (NEPC) in 2019-2020 with the support of the Open Society Foundations (Education Support Program), in partnership with four civil society organisations – members of NEPC from Georgia (International Institute for Education Policy, Planning and Management - EPPM), Kyrgyzstan (Foundation Education Initiatives Support – FEIS), Moldova (Educational Center PRO DIDACTICA), and Mongolia (Mongolian Education Alliance - MEA).

The project commenced with training sessions for the four civil society project partners in integrity assessments in education. This was followed by locally-led assessments of integrity in selected areas and reform priorities in education in the home countries of the project partners, as well as the preparation of a national report for each country (see the list of references for more details about the national reports).

The present synthesis report summarises key cross-country findings on the basis of these national reports. Like them, it is guided by the Integrity of Education Systems (INTES) methodology developed by the Center for Applied Policy and Integrity in the framework of the OECD and affiliation with the Lab on Institutional Corruption at the Edmond J. Safra Center for Ethics at Harvard University. The purpose of INTES is to help national authorities and stakeholders in understanding the policy-related conditions under which corruption in their education systems thrives.

1.2 About the synthesis report

Focus

In line with the INTES methodology and the approach adopted in the national assessments, this synthesis seeks to deliver answers to two questions: whether participants in school education in Georgia, Kyrgyzstan, Moldova and Mongolia engage in problematic practices (integrity violations) that lead to the abuse of human and financial resources in education and if the answer is yes, what are the mechanisms and systemic weaknesses which facilitate and motivate such conduct.

The INTES assessments in Georgia and Moldova focused on integrity in the management of human resources in education, while in Kyrgyzstan and Mongolia the reports analysed the integrity of using financial resources in the form of parental donations to public education providers.

Table 1.1 **National INTES assessments by country and thematic focus**

Focus on human resources (staff policies)	Focus on financial resources (parental donations)
Georgia	Kyrgyzstan
Moldova	Mongolia

The scope of "corrupt conduct" covered by our research includes both practices for which there is criminal liability and also softer, sector-specific actions which are harmful, but which may not qualify as corrupt by international standards. Both types of practices were subsumed in the notion of "integrity violation": an action which is intentional, systemic, involving education participants in professional positions (e.g. administrators, principals, teachers), and contradicting the values and principles that apply to the education sector of the four countries participating in our research.

We also gathered evidence on the vulnerable areas in education that create conditions in which integrity violations can thrive. The purpose was to provide practitioners, civil society stakeholders, and decision-makers with guidance on how these conditions could be improved. "Vulnerable areas" were thereby defined as weaknesses in policy and practice in education, which may provide education participants with systemic opportunities and reasons to engage in integrity violations.

This synthesis report is not a summary of the national reports, but a digest of the findings that an international team of education integrity experts as authors of this report considers to be the most important challenges requiring follow-up action in the form of further research, advocacy, and policy change. While the selection may not coincide fully with the choices of national authors, it is our hope that the findings complement the national ones in a way that is constructive and beneficial for all sides involved.

Research methodology and scope of evidence collection

National strand of research

On a national level, the methodology of this research consisted of three phases: desk research, primary evidence collection through focus groups and dynamic storytelling, and in-depth follow-ups in the form of semi-structured bilateral and group interviews in each country. The application of these steps varied across countries to account for the specificities in local contexts (see the Annexe to the synthesis for an overview). Throughout these phases, there were three guiding questions. One focused on illicit conduct (what is happening in education in terms of integrity violations?), the other two focused on integrity vulnerabilities in the professional environment (how do education policy and practice enable and motivate such conduct?).

In the desk research phase, each country's team built an initial repository of documents, mapped them according to their relevance for the research theme, and used the information to determine the focus of inquiry at the stage of primary evidence collection.

In the phase of primary evidence collection, national researchers consolidated a stratified purposive sample of participants in the phase, prepared guidelines and materials describing the focus group evidence collection protocols and carried out the evidence collection with the help of dynamic storytelling (DSM) techniques.

The total size of the sample across the countries was 224 counterparts, with large variations in the number and role of education participants, which was determined by the policy area focused on in each country. In Georgia and Moldova, where the theme was integrity in the management of human resources, the majority of counterparts were teachers and principals, while in Kyrgyzstan and Mongolia, the focus on parental donations led to the predominant involvement of parents Figure 1.1).

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Figure 1.1 Purposive sample composition by country

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

GeorgiaM oldova Kyrgyzstan Mongolia

Teachers School principals Parents Ministry NGO Experts

Source: National INTES reports

In the third and final phase of the research, there was the preparation and analysis of focus group transcripts, an initial overview of findings, and a series of subsequent follow-up discussions, interviews, and in some cases site visits to gain additional detail about individual stakeholder perspectives and experiences. The national reports were then subjected to several rounds of national and cross-country peer reviews before finalisation and submission for the cross-country analysis presented in this synthesis report.

Cross-country (synthesis) strand of research

The synthesis methodology behind this report was guided by the same set of three INTES research questions about integrity violations and their origin in the respective education environment. To determine the answers, the national reports were subjected to a three-step content analysis. We applied an inductive approach to consolidate a matrix of three levels of policy messages/findings in view of promoting peer learning and establishing a basis for further research.

First, we carried out an external review of each national report to identify the key integrity findings for each country (Level 1 findings) in response to INTES questions. Second, we extracted two groups of synthesis findings for each of the two themes in focus of our research (Level 2 findings). Third, we looked into whether there are similarities in the policy context of the integrity challenges in each country and consolidated an overview of shared vulnerabilities and contextual characteristics (Level 3 findings) in view of delivering a base of evidence for peer learning and further research.

The preliminary results on all three levels were subject to several rounds of peer review to ensure consistency and the accuracy of contextual interpretations.

Structure

This report presents the cross-country findings and synthesis messages on levels two and three. Chapter 2 provides an overview of findings by integrity violation. It groups the countries in pairs by a shared theme (the integrity of teacher policies in Georgia and Moldova and integrity in the management of financial resources in Kyrgyzstan and Mongolia), describes the manifestations and prevalence of integrity violations, and the policy vulnerabilities that lead to each. Chapter 3 then discusses a selection of findings that are common across the participating countries, including the dominant contextual commonalities, the policy vulnerabilities that create integrity risks, and a set of shared pointers for follow-up action.

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Chapter 2. Findings by country and integrity violation

2.1 The illicit conduct focused on in this report

The INTES typology of integrity violations in education describes nine integrity violations (IVs). These include the illicit provision or denial of access to education, improper private supplementary services - IPSS (i.e. private tutoring), the intentional politicisation of education, undue recognition of student achievement, favouritism in staffing decisions, the misappropriation of funds, procurement fraud, cheating, and accreditation and licensing fraud (Table 2.1).

In our research, we focused on two of these nine IVs: favouritism in staffing decisions (IV.5) in Georgia and Moldova, and misappropriation of funds in education (IV.6) in Kyrgyzstan and Mongolia.

Table 2.1 Typology of integrity violations in education

No.	Typology of illicit conduct (Integrity violations – IVs)	Definition
IV 1	Illcit provision or denial of access to education	Arbitrary withholding or provision of access to education by those in charge of access, in exchange for undue benefit or the prospect thereof.
IV 2	Improper private supplementary services	Services such as private tutoring, which are provided by teachers or other professionals privately and for personal gain in addition to their regular work in education, to students and in subjects or areas which they teach or otherwise cover in their regular work, with the purpose of student advancement and/or support.
IV 3	Politicisation of education	Building and promoting political and quasi-political connections, loyalties and networks in (public) education with a view to using them for personal or political advantage.
IV 4	Undue recognition of student achievement	Intentional over-marking or under-marking of students in regular education and the fraudulent granting of graduation credentials in exchange for personal benefit or the prospect thereof.
IV 5	Favouritism in staffing decisions	Redistribution of public resources in the form of employment contracts, employment-related promotions and benefits in favour of relations, friends, colleagues or people who are otherwise close to those in charge of the staffing decisions.
IV 6	Misappropriation of funds in education	Embezzlement of assets (funds) in education by someone who does not own them but is entrusted with their management or control.
IV 7	Procurement fraud	Use of fraudulent schemes to procure goods and services for education providers in view of personal enrichment.
IV 8	Cheating	Misrepresentation through fraudulent means (including plagiarism) by those seeking formal recognition of student achievement, of the work they have done and/or the knowledge and skills they have acquired.
IV 9	Accreditation and licensing fraud	The use of fraudulent means, including of personal favours or the prospect thereof, to obtain a license to operate, degree-awarding powers, and/or programme accreditation.

Source: (OECD, 2018)

Favouritism was understood to be the redistribution of public resources in education in the form of employment contracts, employment-related promotions, and benefits in favour of relations, friends, colleagues, or people who are otherwise close to those in charge of the staffing decisions. The misappropriation of resources on the other hand was defined as the embezzlement of assets in education by individuals who do not own them but are entrusted with their management and/or control.

A definition does not necessarily say much about the way integrity violation takes place (OECD, 2018). Depending on who is involved and what level of education is concerned, one and the same violation may have manifestations that vary between segments of education and within one and the same segment of education in different countries. While our participating countries described illicit conduct, which matched the shared definitions of integrity violations and in most cases also their manifestations, there were also some distinct, country-specific differences.

The next section describes the common and country-specific findings in this respect, by policy area.

2.2 Abuse of human resources in education: favouritism in Georgia and Moldova

Favouritism can influence decisions at any stage of the career path of professional staff in education, from the moment of their recruitment and first-time appointment, through decisions affecting their career development and working conditions, to matters concerning dismissal or retirement.

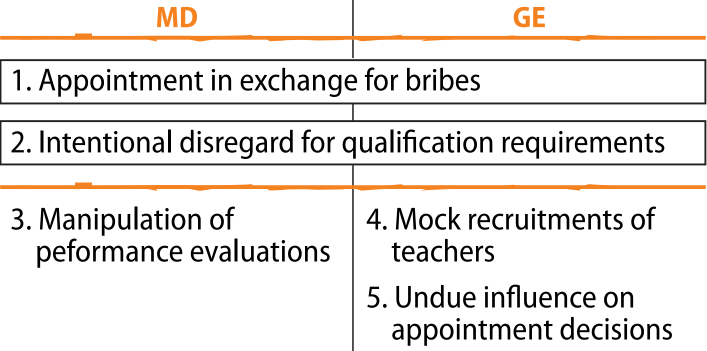
In Georgia and Moldova, favouritism seems to be most prevalent at the point of entry to the teaching profession, but there are also instances in which favouritism was targeting teachers who were already in the profession, i.e. through decisions about the distribution of workplace advantages and the outcomes of teacher appraisals, which were subject to undue influence in favour of relatives, friends or political affiliates.

Typical manifestations of integrity violation

Common manifestations

A noteworthy feature of the illicit conduct in the area of managing human resources is that some forms of favouritism were the same in both countries, although both have a different track record with anti-corruption reforms in their public sectors, including in education. Georgia is commonly considered a good practice example in this respect, while Moldova is still struggling to ensure that its anti-corruption efforts are gaining traction "on the ground."

Figure 2.1 Common and country-specific manifestations of favouritism



In both countries, the national researchers recorded cases of teacher appointment in exchange for bribes and the intentional disregard for minimum qualification requirements for new teachers (hiring candidates with less than the minimum qualifications required by law). These two manifestations are discussed in the next sections of this chapter.

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Appointment in exchange for bribes

In Georgia and Moldova, teaching is not a well-paid profession, however, in both countries, there are settings and situations in which it is an attractive enough professional option to allow for the extortion of informal payments from prospective candidates for teaching: from young graduates looking for first-time employment and from others who, for one reason or another, are on the look-out for employment stability and/or a job that requires only a part-time presence at the place of work.

The practice of bribing one's way into teaching seems to be present in Georgia, albeit there is no reliable evidence of its prevalence. One participant in the research noted that in some schools, the entry price of employment is known and set in advance (Quote 1), while another confirmed that it is widespread in rural areas, where bribes for jobs in teaching are more likely to be given in-kind:

> *Quote 1: "It has not happened in my school, but I have heard from my colleagues that there are certain prices set for teacher positions in some schools." (A participant in an FG discussion from Georgia)*

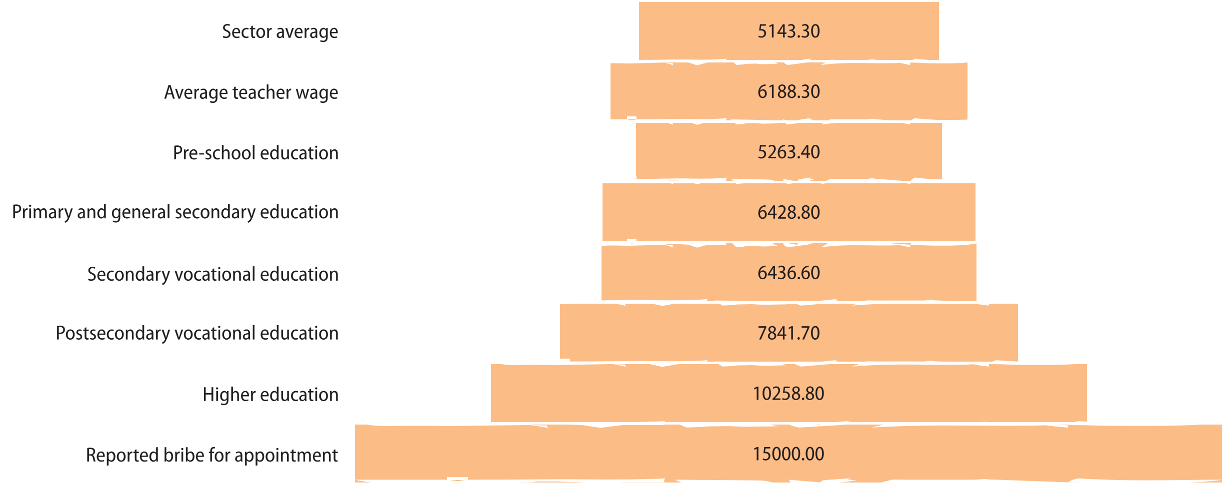
> *Quote 2: "This practice is widespread in our region. If in cities applicants pay money for positions, in rural areas they use non-monetary compensations." (A participant from an ethnic minority region in Georgia)*

In Moldova on the other hand, recruitment in exchange for bribes seems more prevalent in sought-after, "elite" schools in urban areas that enjoy a good reputation. Rural schools on the other hand would usually struggle to fill their teaching vacancies.

> *Quote 3: "I confess this case from my managerial experience at the national level, when one teacher, who intended to employ in an "elite" high school in the capital, the manager asked her for a bribe of MDL 15,000 to get a job. This was subsequently confirmed by other employees of the institution." (FG participant from Moldova)*

Quotes like this one also suggest that in settings where a bribe is a precondition for becoming a teacher, the initial investment for the prospective candidate can be substantial. The MDL 15,000 which were quoted as the typical amount for a bribe into teaching at a good urban school, amount to a quarter of the average annual salary in the education sector for 2018 (Figure 2.2). In turn, this may be excluding job applicants from more disadvantaged socio-economic backgrounds.

Figure 2.2 Reported teacher appointment bribe and the average income of staff in education, in MDL (2018)



Data source: National Bureau of Statistics of Moldova and INTES national report

Intentional disregard for qualification requirements

Another rather typical manifestation of favouritism in staffing decisions in both Georgia and Moldova is the practice of disregarding staffing regulations by appointing candidates with less than the minimum qualifications required by law. The national researchers recorded cases of favouring job candidates on the basis of alternative considerations, such as family connections or friendship, but also purely for convenience due to an otherwise burdensome, overly formal recruitment process.

In Moldova, for example, an audit of public vocational education and training (VET) providers carried out by the Ministry of Education (MoE) several years ago revealed that in some schools, just over a third of the staff appointed as teachers had teaching qualifications. The practice of appointing such candidates was described as an "illegal act" and it was implied that the schools in which such violations were discovered were not an exception, but rather the rule.

> *Quote 4: "The results of the control showed that several teachers were hired in positions for which they did not have the necessary qualification. For example, the instructor did not hold a didactic degree and pedagogical experience that would fit the profile of the educational institution…." "Of the 16 persons employed as teachers, only 6 held teaching degrees."(Excerpts from audit reports by the MoE, as quoted in the national INTES report of Moldova)*

The practice is also widespread in general education schools in Moldova. According to MoE information and the national report, close to 15% of the teachers in rural schools and 6% of teachers in urban schools had been appointed to several positions simultaneously, for instance as teachers in multiple subjects, as a way of providing them with additional income but without complying with the minimum qualification requirements, in some cases without even expecting them to teach (Quote 5).

> *Quote 5: "His (the principal's wife, a mathematics teacher, was employed as a full librarian and was appointed as an instructor in the cook group, without holding the necessary qualifications. The same misconduct was identified in the case of hiring the physical education teacher, who is the son of the school director. He was hired for the period 2014-2016 (8 months) without having the appropriate qualification. He is a lawyer, but in the payroll list he was registered as a graduate of the Pedagogical University, while he was employed simultaneously within the Social Assistance and Family Protection section of the … Rayon Council." (National INTES report Moldova).*

Of course, not all cases of teacher appointments in this way may qualify as integrity violations. In some cases, decisions like this may have been made out of convenience, for instance in situations of shortages when the regulations may have even allowed for exceptions. Cases like this were recorded in Georgia, where in 2019 the education authorities (Ministry of Education) adopted a transitional provision that permitted schools to appoint candidates with undergraduate degrees received in any field and not only in education.

The measure has proven controversial because it led to an influx of inexperienced teachers and to demand ad-hoc support (Quote 6). Importantly, it is a problematic solution also from an integrity point of view. The national INTES report of Georgia notes that under the disguise of shortages, the measure has led to the proliferation of favouritism (Quote 7).

> *Quote 6: "I received an inexperienced candidate and let him/her in the classroom, and at the same time I had to provide him with a tutor." (A school principal and interview participant from Georgia)*

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Quote 7: "The created situation increases the cases of favouritism since this enables decision-makers to make decisions in favour of their friends, relatives or acquaintances under the disguise of teacher shortages and flexibility of qualification requirements." (National INTES report Georgia)

Indeed, even though the actions of principals in such situations may be understandable and may have been undertaken in good faith, their conduct nevertheless poses an integrity risk because it normalises a solution to a wider, systemic problem (teacher shortage), which can be (and is being) abused for illicit purposes.

Country-specific manifestations

A number of manifestations of favouritism were country-specific and linked to persisting education policy weaknesses in each of the two countries. For instance, in Moldova, it is not uncommon for school leaders to abuse the performance evaluation of teachers to provide or deny access to work-related benefits and career development opportunities. Also in Moldova, the preferential treatment of some teachers over others concerning the more favourable distribution of working hours, additional pay, or opportunities for professional development seems to be widespread.
In Georgia on the other hand, the national report described cases in which otherwise well-defined, but difficult to implement recruitment processes were subverted through "mock" compliance with procedural requirements in order to eliminate applicants in favour of candidates who were chosen "in advance." In Georgia, there were also cases of undue, politically motivated external influence on the appointment decisions to be taken by school principals.

Manipulation of performance evaluations in Moldova

Career advancement is an important aspect of the attractiveness of teaching and it can also be a source of incentives for professional improvement (Darling-Hammond & Rothman, 2011). In some countries, the career progression of teachers depends on their tenure, while in others it may be linked to their performance, or both (OECD, 2005b).

Moldova belongs to the group of countries in which the career progression of teachers depends on their performance. The performance evaluations are prepared by the principals and the outcomes of these evaluations are combined with the attendance of in-service training and the grades of students to justify decisions about the promotion of teachers into more senior teaching ranks (there are a total of three ranks), or into school administration positions. Higher ranked teachers earn more than teachers with a lower rank do and, naturally, they also enjoy a higher standing among their peers in their schools.

In such a performance-based system of career promotion, the performance evaluations of the principals are a key instrument of human resource management. Unfortunately, in Moldova, they are also prone to abuse. According to accounts by teachers recorded by the national research team, some school leaders misuse the evaluations as a tool for arbitrary reprisals against teachers and/or to ensure their allegiance (Quote 8).

Quote 8: "As far as professional growth in the teaching career is concerned, some principals, deputy principals, use the evaluation of teachers as a punishment tool, which in many situations leads to corruption, for instance when a teacher wants to grow professionally." (A teacher and FG participant from Moldova).

Principals can also manipulate performance evaluations to justify unilateral redistributions of a school's budget for the year without accountability, and to favour loyal teachers by providing them with financial rewards (Quote 9), as well as in the form of additional hours (Quote 10). The national report notes that the budgetary implications can be substantial as wages and wage-related payments account for well over 70% of a school's budget on average.

> ***Quote 9:*** *"This year, the principal, without carrying out proper self-evaluations, filled in the annual evaluation, reducing bonuses, and forced teachers to sign them. For example, to a teacher with didactic grade 1, with 30 years of experience, she said that she "does not work in a team", and to another teacher "she does not contribute to the development of the school." However, she offered 10% bonuses to others, loyal teachers." (A teacher from a rural school in Moldova)*

> ***Quote 10:*** *"Moldova: Another integrity violation relates to the distribution of hours among teachers by favouring some teachers/relatives over others or offering unjustified bonuses." (National INTES report Moldova)*

Teachers too may engage in performance evaluation fraud, for instance when they are interested in preserving their status quo and the advantages that go with it, without having the necessary qualifications (Quote 11).

> ***Quote 11:*** *"On the other hand, in the evaluation process, acts of corruption are generated by some teachers, because they are not sure about their own knowledge, they avoid developing their professional competences, and the simplest way to solve problems is an act of corruption" (An FG participant)*

The fact that illicit conduct could be initiated by teachers and school leadership alike suggests that there is a degree of complicity across professional groups in the schools, which may be indicative of the widespread acceptance of favouritism as a norm of professional conduct.

The mock recruitment process for teaching positions in Georgia

In 2019, the authorities in Georgia revised the regulations describing the recruitment, appointment, and dismissal of teachers and introduced a procedure with clearly defined steps to ensure that the decisions in this area are fair, transparent and in the best interest of the profession.[1]

Evidence gathered in the course of the interview and focus group discussions for this integrity research suggests that compliance with the formal requirements of this process is widespread and in fact, many of the national counterparts in Georgia assessed that process positively. However, the national report also recorded cases in which the experiences of candidates during the recruitment interviews were in strong contrast with these otherwise encouraging impressions. For instance, some respondents noted that the interview for the job felt "very formal", that it lasted only a few minutes and that some principals even held group interviews, which the teacher candidates found "even more unacceptable."

The prevailing explanation of participants in the collection of evidence was that the vacancies had been distributed in advance and that the recruitment process was a mock process which was meant to validate the prior, informal decision about the appointment.

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[1] Decree No. 174/N of the Ministry of Education regarding hiring and firing schoolteachers as quoted in the national INTES report of Georgia and is available at www.matsne.ge

Quote 12: "I know for sure that the interview was formal in two schools. Later I was told that a candidate had already been chosen." (A teacher candidate and FG participant)
To avoid the appearance of fraud, in some cases principals had even told candidates not to apply for the job because the position was already taken and that the vacancy was announced just for the sake of compliance with the formal requirements of the law.

Quote 13: "I applied for a teaching position in one regional school and was asked for an interview by the principal. However, one teacher who worked at the same school and happened to be my teacher told me not to go to the interview since they had already chosen a candidate for the position." (A teacher candidate and FG participant)

It is difficult to determine the prevalence of such practices. Beyond statements like these, it is also hard to prove that appointment decisions have indeed been taken informally and in advance.

Information about the existence of such decisions is often provided in similarly informal ways and there is no evidence that unsuccessful candidates have ever filed formal complaints.

Undue influence on appointment decisions in Georgia

According to some authors, undue influence is a "subtle" form of corruption because those who seek to influence a decision-making process do so by using legitimate mechanisms (Hellman, Jones, & Kaufmann, 2000).

In the cases recorded by the national researchers from Georgia, selected stages in the recruitment process of teachers can become the target of undue influence, namely the stages of shortlisting candidates after the first round of applications in response to a vacancy announcement, and the final choice of a successful candidate.

Quote 14: "I received several calls. I also received a recommendation letter from the city hall. I received calls from the Ministry as well. Other colleagues told me the same." (A school principal)

Here too, there is no data about the prevalence of this manifestation of favouritism as such data has never been collected, however, remarks by the participants of focus groups, as noted in Quote 14, suggest that this practice may be rather widespread as well.

Policy vulnerabilities which lead to favouritism

The national reports of all four countries confirm one of the key insights from the INTES research so far, namely, that illicit conduct in education can usually be traced back to shortcomings in education policy and practice, as noted in the national report of Georgia: "...the most important (factors fostering integrity violations) are improper planning and implementation of educational policy. The situation is aggravated by accelerated changes and the lack of consistent monitoring."

These policy shortcomings create integrity vulnerabilities by fuelling stakeholder distrust in the ability of schools and universities to live up to expectations in legitimate ways (Milovanovitch, 2020). Despite their obviously different development trajectories and policy solutions, Moldova and Georgia seem to share a range of such shortcomings in teacher policy regarding the recruitment, promotion and dismissal of teachers. Some of them are long-standing and may never have been properly addressed, while others seem to have been caused by recent policy changes, as will be discussed in Chapter 3.

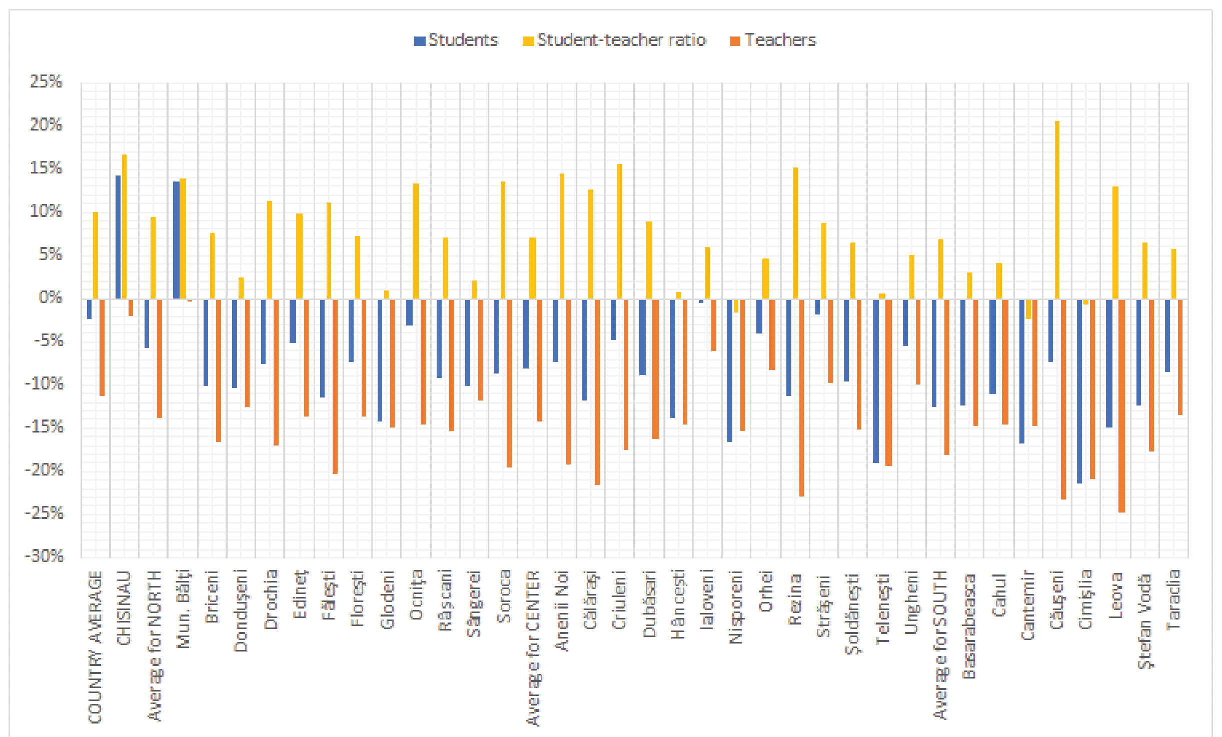
Teacher shortages due to gaps in planning and unattractive working conditions

Teacher shortages are a major source of integrity vulnerabilities in both countries. They are forcing many school principals to bend or break the rules of recruitment, for instance by disregarding the minimum qualification requirements for a teaching job, in order to fill their vacancies and prevent the collapse of education provision through their schools.

Some of these shortages are due to a long-standing disbalance in the distribution of the teaching workforce across the education system. Primary and especially secondary schools across Moldova, for example, are struggling with teacher shortages, in many cases due to their geographical location. The national report suggests that schools in rural and disadvantaged areas are particularly affected, as most young graduates prefer to find a job in a city. In urban schools, on the other hand, the loss of teachers is less pronounced, but it exists as well, mostly because of the influx of students from the province.

There is data to confirm these observations. In all regions and localities in Moldova apart from Nisporeni, Cantemir, and Cimislia, this has led to an increase in the ratio of students to teachers over the years since 2014, in some cases a substantial increase, for example, in Causeni (20%), Chisinau (16.6%), Criuleni (15.5%), Rezine (15.2%), and others (Figure 2.3).

Figure 2.3 Student-teacher ratio, number of students, and number of teachers: percentage change between 2014 and 2019 by region



Source: team calculations based on data from the National Bureau of Statistics of Moldova (National Bureau of Statistics, 2020)

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The problem can be traced back to gaps in the allocation of teachers across the education system and the planning of the school network, which does not seem to be aligned with the demographic developments. The national report notes that, although the number of students in urban areas surpasses the number of students in rural areas, rural schools continue to outnumber the schools in cities by a factor of three.

According to information in the national report of Moldova, teacher shortages are influenced not only by the location of the schools but also by the subjects they teach. Some subjects in the curriculum are more affected by teacher shortages than others, which leads to a situation in which about 10% of the teachers in the country are forced to teach two or more subjects and principals have an excuse to address the problem by appointing people who are close to them but do not possess the necessary qualifications (see the previous section about manifestations).

Unfortunately, the official education statistics in Georgia do not offer this level of detail, however, the national researchers from that country describe a similar situation of overt and covert teachers shortage, which helps to explain some of the reasoning behind the problematic staffing decisions described in the previous section, especially those before the recruitment reform.

> *Quote 15: "Due to the specificity of the Georgian educational system, it is a fact that up to 70% of schools are small scale schools, on the one hand, there is an abundance of teachers overall, yet on the other hand there is a deficit of teachers in certain regions (unequal geographic distribution) and disciplines. The student-teacher ratio varies greatly according to school location, type, and the number of students at the schools. The deficit is made worse due to the large number of teachers of retirement age." (National INTES report Georgia)*

An important reason for the shortages in the supply of new teachers in both countries is the low attractiveness of teaching as a professional option. The national research findings suggest that the employment conditions of teachers in both countries have some of the features of precarious employment, such as low wages and a degree of employment uncertainty (risk of employment contract termination), which have ramifications for the integrity of appointment decisions.

Box 2.1 Key elements of precarious employment

"The state of precarity takes somewhat different forms depending on the country, region, and the economic and social structure of the political systems and labour markets. Thus a variety of terms have emerged from particular national contexts, such as contingent, atypical or non-standard work.

Despite this variety of rather context-specific ways of referring to precarious work, some common characteristics can be identified (…) that encompass the majority of the workers who are the most adversely affected by precarious work arrangements." These can be grouped into two categories of contractual arrangements characterised by four precarious working conditions.

***Contractual arrangements:** the limited duration of the contract (fixed-term, short-term, temporary, seasonal, day-labour and casual labour); the nature of the employment relationship (triangular and disguised employment relationships, bogus self-employment, subcontracting and agency contracts).*

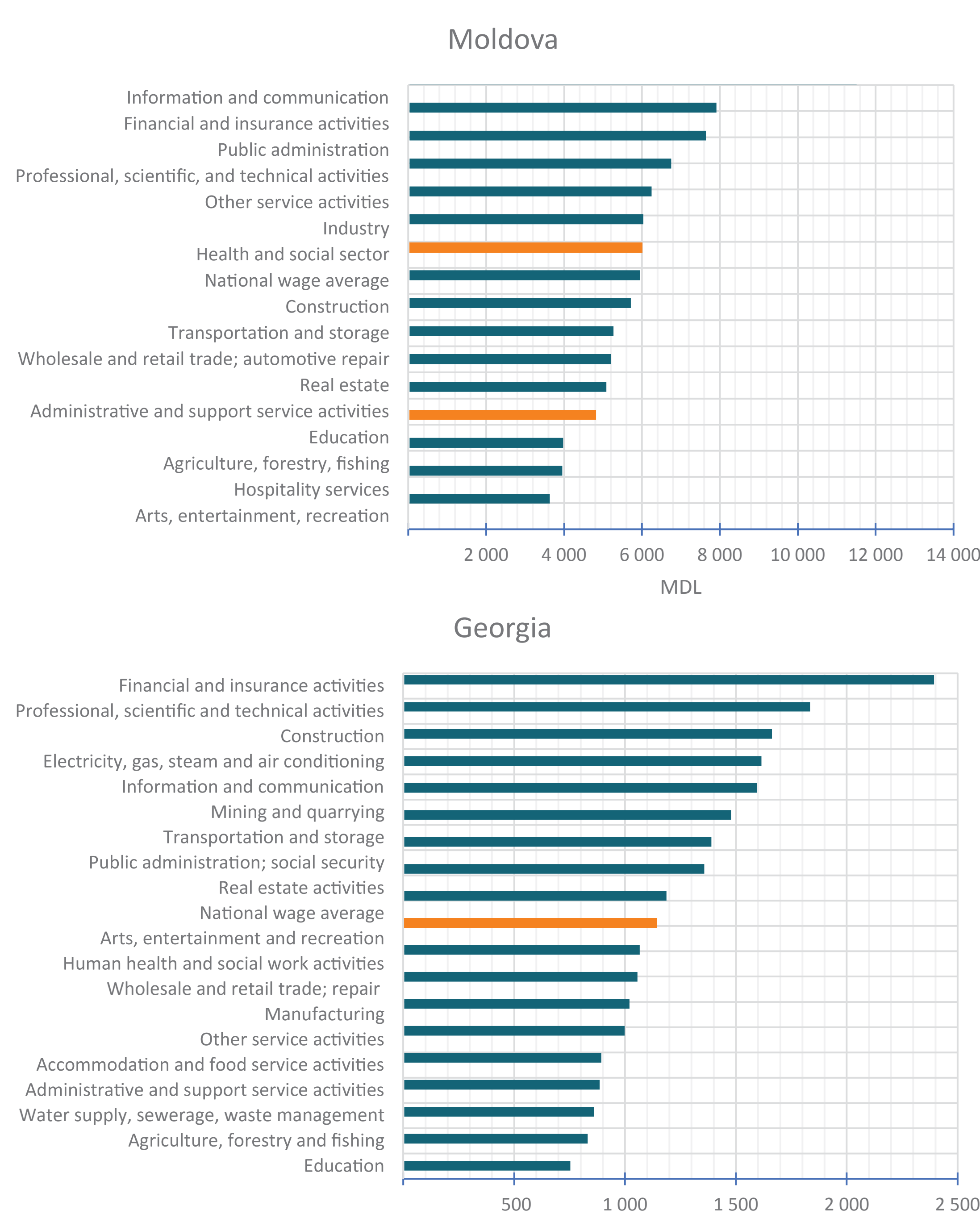
***Precarious conditions:** low wage; poor protection from termination of employment; lack of access to social protection and benefits usually associated with standard, full-time employment; lack of or limited access of workers to exercise their rights at work.*

Source: (ILO, 2011)

In Georgia, for example, education offers the lowest average wages of all sectors of the economy (Figure 2.4) and until the recent retirement campaign, many of the teachers could only work part-time because the teaching workforce was oversized, which limited the access of most of them to full-time employment and a more decent salary. In Moldova too, wages in education and school education, in particular, are among the lowest of all sectors and are considerably below the average wage for the country.

> *Quote 16: "Most cases of corruption occur because of the low salaries in the education system, but also because of the desire of the leaders to demonstrate authority over subordinates or to promote loyal ones." (A focus group participant from Moldova)*

Figure 2.4 Average monthly earnings by economic sector in Moldova (2017) and Georgia (2018), in local currency



Sources: Moldova: National Bureau of Statistics; Georgia: National Statistics Office

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Next to low wages, substandard working conditions also play a role, especially in rural areas. For example, the national report of Moldova notes that "on average 73% of the total budget of a school is spent on salaries" leaving only 27% of the budget for developing a school as an environment for learning and working. The same report emphasises that this has a negative impact on the teaching environment in schools and diminishes the attractiveness of teaching as a profession. In turn, this leads to shortages due to a lack of qualified candidates and provides schools with an excuse to hire relatives and friends to fill in the gaps. The participants in the focus groups in that country sent messages along these lines as well.

> *Quote 17: "The directors interested in hiring the best specialists publicly announce the vacancy, but municipal schools have a better chance of getting the candidates. In rural schools … the administration is happy to hire at least someone who would like to come, so it is no longer a competition." (A focus group participant from Moldova)*

The finding that the salaries of teachers in both countries are low is hardly new. Also, in terms of possible policy responses, the salary increases for teachers are usually the costliest and often least feasible measure for those in charge. It is also questionable whether wage increases alone will help remedy the teacher shortages that lead to the integrity risks that this chapter describes.

A more significant and possibly less costly to address challenge than salaries, is the absence of effective incentive schemes for prospective candidates to apply and accept positions in rural schools. There is also an obvious problems with the efficiency of planning of the school provider network, which is not aligned with demographic demand. These are factors that lend themselves to an immediate policy response, in both countries. Georgia has already introduced some actions along these lines, for instance, there are some projects that offer a wage supplement to qualified candidates who agree to accept teaching positions in rural schools, but there is need for more system-wide action in this respect.

Shortcomings in recruitment and appointment procedures

Missing or unworkable procedural requirements

Another policy weakness at the point of entry to the teaching profession in both countries that incentivises involvement in favouritism is the missing or unworkable recruitment procedures for new teachers. This shortcoming hinders compliance and opens the door to various forms of undue influence on appointment decisions.

In Moldova, for example, the national report describes a situation in which the competitions for a teaching position take place without a defined procedure. All decisions in this respect are left to the discretion of school principals, who in turn are susceptible to external pressure. Although the Education Code stipulates that the appointment of teachers should take place through a competition following a uniform methodology by the MoE,[2] the authorities have still not developed such a methodology and, in fact, the national report states that the methodology has been "put on hold" for some years now. In its absence, principals are free to follow their own, individual approach to appointments and take decisions with or without implementing a formal recruitment procedure.

[2] *Article 54, Education Code of the Republic of Moldova No.152 of 17 July 2014.*

On the other extreme, the recent staffing reform in Georgia included clear rules and the description of steps in the recruitment process, however, for most schools, the timeframe allocated for their implementation was impossible to observe, which in turn provided schools with an excuse to disregard these rules, sometimes on purpose and to the benefit of favourite candidates for a job.

> ***Quote 18:*** *"In 2019, the Georgian government offered teachers who reached retirement age an opportunity to retire and receive a two-year salary as a reward. As a result, approximately 6,000 teachers retired and therefore, many vacancies appeared in schools.*
>
> *The National Center for Teacher Professional Development (TPDC) defined dates for posting vacancies for teachers on a designated website, but the timing of these announcements and the associated deadlines were tight, which created additional difficulties for schools to carry out the recruitment process properly and find suitable candidates… Many teachers pointed out the fact that a large number of vacancies posted simultaneously created many difficulties." (National INTES report Georgia)*

Since a quarter of the teaching positions were held by people beyond the age of retirement, the recent retirement campaign incentivized most of them to retire, and it opened an unprecedented number of vacancies – all at the same time and shortly before the school year. As noted in Quote 18, overnight this put most rural schools in a situation of hard to address teacher shortages and forced the authorities to legitimise the practice of hiring underqualified candidates for teaching.

This situation also put a strain on the prospective candidates for teaching and limited their ability to attend interviews, prepare properly, and attend the interview sessions on time, all of which in the words of national researchers "caused chaos and inconvenience" and forced principals to hire the candidates available instead of those who would have been the best for the job.

> ***Quote 19:*** *"I was asked to come to an interview from three different schools at the same time. I could not attend all of them." (A teacher candidate)*

> ***Quote 20:*** *"I hired someone just to be able to provide lessons for students. I did this in physics and sports. We asked five candidates to come for a job interview but only one appeared. I had no other options." (A school principal)*

Inadequate recruitment criteria and procedures

According to the current legislation in both countries, the authority for appointing teachers in line with state policy has been delegated to the education providers. In both countries, the appointment procedures are referred to as based on a competition, which leads to appointments by the leadership of each school through a contract, in accordance with procedural bylaws. The school principals are also responsible for the dismissal of teachers.

Georgia and Moldova are not isolated examples of the decentralised approach to teacher recruitment. Some countries (e.g. Singapore, France, Spain, Japan, Italy, and others) keep this particular responsibility at the level of the government (central, regional or local) in charge of employing the teachers and principals, while many others delegate it to the leadership and/or professional staff of the education providers. In 2015, the latest year for which there is data disaggregated in such a way, in 47 of the 74 countries and economies participating in PISA, 50 or more percent of the students attended schools whose principals reported that the main responsibility for selecting teachers for

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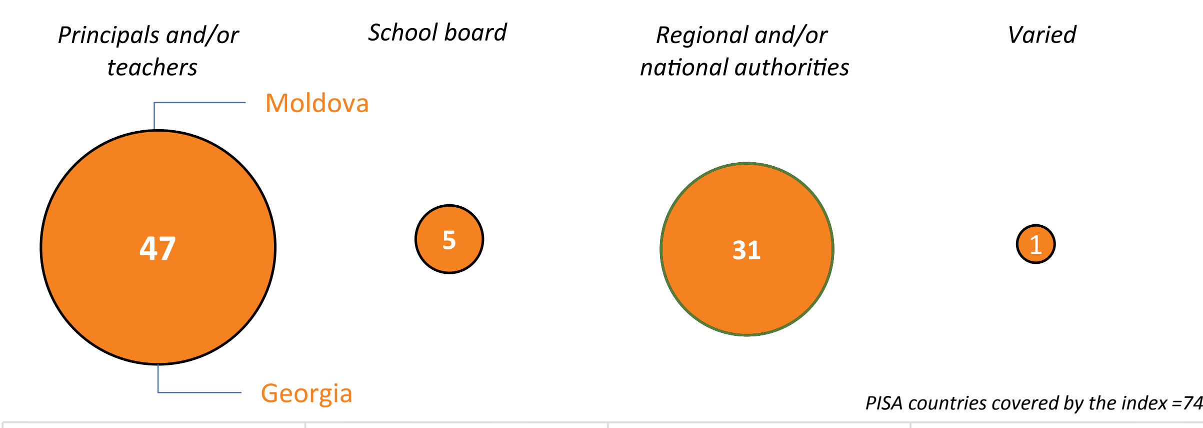
hire is with them and/or with the teaching collective, just like as in Georgia and Moldova. In 37 of those countries and economies (including in Georgia and Moldova), they also had the firing of teachers as a prerogative (Figure 2.5).

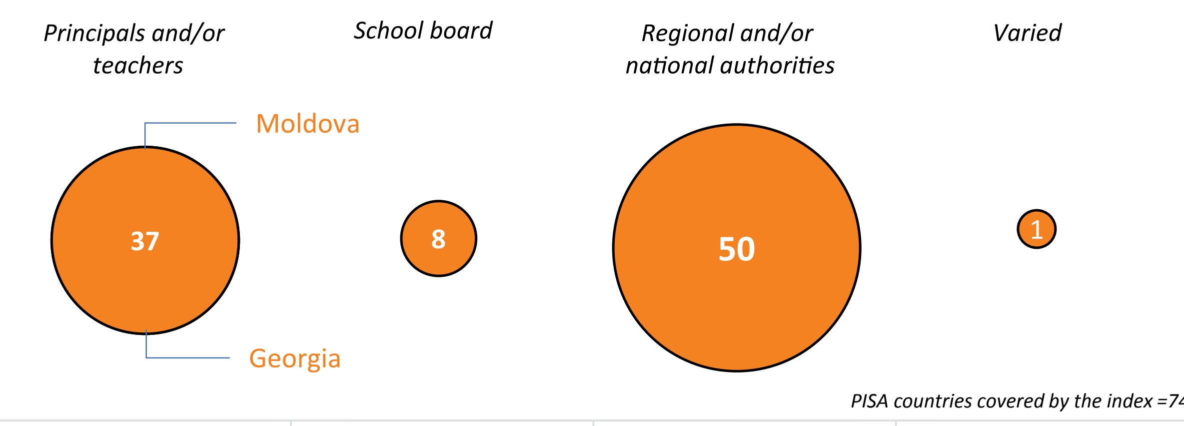
Figure 2.5 OECD PISA index of school autonomy over resource allocation: the distribution of the responsibility for selecting teachers to hire and the firing of teachers in selected countries

The number of PISA 2015 participating countries and economies in which 50 or more per cent of students attend schools whose school principals report that only "regional and/or national education authority", both "principals and/or teachers", or only "school boards" have considerable responsibility for selecting teachers to hire and for the firing of teachers. Countries in which none of these three patterns of responsibility distribution is predominant are grouped under "Varied."

Selecting teachers for hire



Firing of teachers



Note: The degree of responsibility of schools in allocating resources might not be strictly comparable between countries. Responses may depend on how school principals interpreted the questions (OECD, 2013).

Data source: OECD PISA 2015 Database, Table II.4.1 "Responsibilities for school governance."

In all countries with a decentralised approach to recruitment for which there is information, school leaders rely on detailed recruitment procedures and selection criteria for their decisions, with the help of which they are also accountable to their school boards, as well as regional and national education authorities. This makes it easier to apprehend those decisions and hold the decision-makers accountable. In many of these countries, a competitive examination of prospective teachers is a cornerstone of the recruitment process. The results and other criteria, such as interviews, academic qualifications, etc. are used to compile a transparent ranking list of suitable candidates, from which to select the future teachers (OECD, 2005b).

Despite the formal commitment to competition, in Moldova teaching candidates do not undergo any kind of testing, and the schools seeking to fill their teaching vacancies are not obliged to use candidate lists. This is a direct consequence of the procedural and selection provisions that are too generic to guide a more accurate selection approach, thus leaving scope for arbitrariness by those in charge of selecting teachers to hire. In particular, the requirements as stipulated in the laws and bylaws are limited to a description of the formal academic qualifications that candidates must have before they can apply.

Box 2.2 Recruitment of teachers in Denmark

Teachers working in the public sector are the salaried employees of municipalities, which are also in charge of their recruitment. As a result of greater decentralisation in decision-making, many municipalities have, however, delegated the power to appoint teachers to the schools, either for all teachers or for teachers on fixed-term contracts.

To obtain employment as a teacher in Denmark, individuals should have a recognised qualification, which is usually an approved teacher education degree, or an equivalent foreign qualification. Other requirements include a good command of the Danish language and satisfactory results in a criminal history check. Being the responsibility of school leaders, teacher recruitment and appointments are undertaken in the context of open competitions.

At the school level, a Selection Committee is appointed to examine the applications for teaching posts. The committee includes the principal, and the union and parents' representatives to the school Board of Governors. It selects a number of applicants, conducts job interviews and assesses the qualifications of the applicants, after which the Board of Governors or the principal makes a decision and sends the recommendation to the head of the municipal administration (if the power to appoint is not delegated to the school). Applicants are expected to have familiarised themselves with the school's values and profile. Many principals also expect the applicants to make an exploratory visit to the school before their application is sent.

Source: (OECD, 2005b, p. 152) (OECD, 2011, p. 85).

In 2019, the authorities in Georgia lowered the bar on the minimum qualification requirements and made them even more generic by allowing candidates with a bachelor's degree in any field to apply. The national report notes that this amendment has "significantly simplified the requirements for a teacher that existed even before 2015 when the qualification requirements and teacher standards were revised." As already noted, in Moldova too, principals are charged with the responsibility for appointments, however, without being given any specific guidance on what criteria to consider beyond the formal academic credentials of candidates.

Important as they are, such generic criteria are hardly sufficient to guide the identification of the best candidates for teaching. From an integrity perspective, in absence of more detail in both the

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recruitment procedure and the criteria it relies on, the full autonomy of school leaders for hiring and firing teachers makes the corresponding processes in both countries vulnerable to arbitrariness and abuse through favouritism. It opens up opportunities for alternative considerations and undermines the value and visibility of even those decisions that might have been taken on the basis of merit by school leaders who opt to preserve their professional integrity.

Favouritism is not properly defined as an offence in education

Two major international anti-corruption instruments – the United Nations Convention against Corruption (UNCAC) and the Council of Europe Criminal Law Convention against Corruption – advise (and in some cases require) their states-signatories to cover a wide range of corruption offences by defining them as offences under domestic law (OECD, 2008).

Favouritism in all its manifestations falls under the broader category of intentional "abuse of functions or position." The UNCAC defines it as the "performance of or failure to perform an act, in violation of laws, by a public official in the discharge of his or her functions, for the purpose of obtaining an undue advantage for himself or herself or for another person or entity" (see UNCAC, Article 19). The technical level recommendations on compliance with both the UNCAC and the Criminal Law Convention suggest countries have a general description of this offence and complement it with a more comprehensive "catalogue" of violations that fall under that description (UNODC, 2009).

The Law on Civil Service of Georgia has a number of provisions against conflict of interest and transactions involving family and household members of civil servants and public officials.[3] There are also similar provisions in the anti-corruption legislation of Moldova, i.e. in the Law on Prevention and Fight Against Corruption,[4] the Law on the Public Service and Public Servant Status,[5] and also in the current National Anticorruption Strategy.

It is safe to affirm that representatives of national and regional education authorities would be covered by the abuse of authority and conflict of interest provisions in these laws. However, in both Moldova and Georgia, the school principals are public sector employees, but not civil servants or public officials, and it is, therefore, less clear whether they are covered by these provisions. Although there are sector-specific rules, such as codes of conduct and professional standards, they do not focus on integrity violations nor do they clearly define sanctions/consequences for transgressions.

This, of course, is a serious limitation. The school principals in both countries play an important formal and informal role in staffing decisions and have strong incentives to influence these decisions in favour of their own candidates (family members, people whom they "know from before", etc.), as already discussed.

Would it be of benefit if Georgia and Moldova defined in their legislation favouritism in education in a more precise, sector-sensitive, and targeted way than is the case now? Very likely. Favouritism is a significant enough problem in both countries to merit a more precise focus by legislators. Furthermore, it is a matter of financial accountability and due diligence to ensure that recruitment is based on merit and takes place in a transparent manner. Also, the positive effect of technical remedies, such as the improvement of recruitment procedures and selection criteria, can be greatly enhanced by defining the administrative and criminal liability for non-compliance.

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[3] See for example Law on Civil Service, Articles 61 or 66.

[4] Law No. 90 of 25 April 2008

[5] Law No. 158 of 4 July 2008

International guidance on how best to approach this task is very limited. As of yet, there are no internationally adopted norms or recommendations about corrupt practices that countries should establish as criminal or other offences in the field of education, and legal research on the matter is also scarce to non-existent (Milovanovitch, Fighting Corruption in Education: A Call for Sector Integrity Standards, 2013). The examples of countries with more complete "catalogues" of special offences falling under the category of "abuse of functions" in the public sector might be of help, but they are rare. However, those countries that have compiled such lists have done it in a rather comprehensive way. In addition to favouritism, this usually includes definitions and provisions on bribery, obstructing the implementation of a law, misappropriation, unlawful taking of interests, violation of the duty of secrecy, neglecting or refusing to act within a reasonable time, etc. (OECD, 2005a).

Some of the solutions applied by those countries might help define favouritism as an offence on the sector level in Georgia and Moldova. France, for instance, stands out as a country with both highly centralised decisions about staffing in pre-university education, and differentiated criminalisation and rigorous sanctioning of corrupt practices in its public sector, including favouritism (Box 2.3) (OECD, 2005a).

Box 2.3 Criminalisation of offences, including favouritism, in the public sector of France

The Code Pénal (CP) or Criminal Code of France, provides for four types of offence: extortion (Art. 432-10), passive corruption and influence-peddling (grouped under Art. 432-11), abuse of office (délit d'ingérence) and undue advantage (prise illégale d'intérêt) (Art. 432-12 and 13), and favouritism (Art. 432-14). The offence of favouritism was created in 1991 and refined in 1993.

A list of disciplinary and administrative sanctions for these offences can be found under Section 66 of Act No. 84-16 of 11 January 1984. They fall into four categories: 1) warning and reprimand; 2) striking off the promotion lists, demotion, temporary suspension from duty, or transfer; 3) suspension; 4) early retirement or dismissal from public service. The strict definitions and resulting penalties have been extremely effective and have cleaned up sectors under high risk of favouritism and resistant to change, e.g. public procurement.

The composition of control bodies is also an important factor, guaranteeing the independence of its members and public trust. The French model of recruiting senior civil servants on the basis of a competition – no favouritism or nepotism – and giving them secure conditions of employment – security of tenure and salary scales – goes part of the way to freeing them from political pressure. Together with the sense of public service fostered by the major training colleges, this explains why most control bodies comprising senior civil servants work well. Only pressure from the administrative hierarchy, often itself subject to political supervision, can affect to some degree the independence of civil servants working in a hierarchical structure.

In 1993, France also created the Service Central de la Prévention de la Corruption (SCPC). It is an inter-ministerial service reporting to the Minister of Justice that centralises the information required to detect and prevent offences involving active or passive corruption and the corruption of private-company managers or staff, undue advantage, extortion, favouritism and influence-peddling.

Source: (OECD, 2005a, pp. 171, 195, 200)

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Distrust in the formal credentials of candidates for teaching

On paper, neither Georgia nor Moldova has a problem with unqualified or underperforming schoolteachers. The official statistics suggest that the percentage of trained teachers is 95% and 98% respectively,[6] and the newcomers to teaching are recruited from a vast pool of candidates with full academic degrees (bachelor or master). Teachers already in the profession are subjected to regular and seemingly strict performance/attestation reviews, which as far as the international team is aware, rarely lead to downgrading or dismissal for underperformance.

Yet, both the national reports and other, external sources suggest that in both countries, the principals of elite and ordinary schools alike tend to rely on prior, informal knowledge of candidates when selecting whom to recommend being hired. It is a setting in which the word of mouth from a fellow principal, the membership of a candidate in a family of teachers or a political party, and/or experience of another school in working with the candidate seems to be a better guarantee of "quality" than formal records of academic or on-the-job achievements.

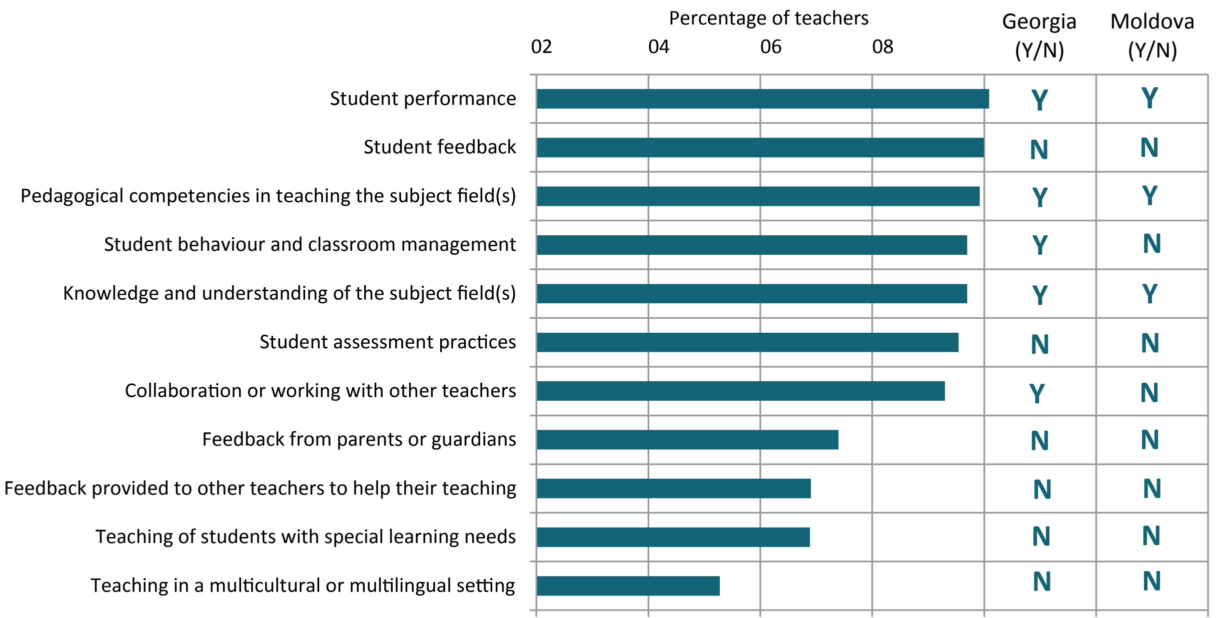
Such tendencies indicate that there might be a problem with the credibility of the formal credentials of teachers and candidates for teaching so that trust is being replaced by informal substitutes based on acquaintanceship. From this point of view, favouritism is not just a way of securing a job at the expense of others or investing in a payback later. It is an effective remedy for deficiencies in the quality assurance of teaching and teacher training. So far, the relationship between trust and favouritism in recruitment has not been researched, but it may deserve closer attention as it is probably a factor in inciting favouritism.

Distrust in the academic credentials of teacher graduates, for instance, might reflect a broader problem with quality. Universities and their faculties in both Moldova and Georgia differ substantially in terms of academic reputation, quality standards, overall standing and size, but common to most of them is that they list pedagogy in their offer of courses. This means that holders of the same teaching qualifications might, in fact, have graduated with a different, perhaps even unsatisfactory level of preparedness, as some research suggests (World Bank, 2015; OECD, 2019). Naturally, this renders their qualifications less trustworthy for schools as prospective employers.

It is less obvious what prevents the use of reviews of teacher performance as the main source of guidance in recruitment. One would expect performance reports to play a greater role in this respect, given the broad ground that performance reviews are supposed to cover: the pedagogical competence of teachers, their subject matter knowledge, the quality of the learning outcomes of their students, assessment practices, classroom management skills, methodological aptitude, and so on. The selection of areas may not be as broad as the selection in OECD countries, but it appears to be broad enough to reproduce a reliable and comprehensive picture of teacher competence and quality. The areas (particularly in Georgia) also coincide with many of those reported to be in the focus of appraisal for most teachers from the countries covered in OECD's Teaching and Learning International Survey – TALIS (Figure 2.6).

[6] Sources: UNESCO UIS and World Bank Development Indicators Database. Data for Moldova is from 2018. Data for Georgia is from 2009 (the latest available year).

Figure 2.6 Areas emphasised in the appraisal feedback to teachers in the selected countries, Georgia and Moldova



Notes:

1. The percentage of upper secondary education teachers who report the feedback they received emphasised the following issues with a "moderate" or "high" importance. Feedback is defined broadly as any communication of the results of a review of an individual's work, often with the purpose of noting good performance or identifying areas for development. The feedback may be provided formally or informally, by fellow teachers, external inspectors, school leaders, or by multiple evaluators (OECD, 2013).

2. The information for Moldova and Georgia is approximated through the provisions of the respective legislation and is presented in binary format.

Source of data and information: (OECD, 2014), (World Bank, 2015) (OECD, 2019).

A possible reason for the limited pragmatic value of these reports is their narrow purpose, which derives from the overall purpose of attestation as the only form or regular, recorded appraisal of teachers in both countries - to verify whether teachers comply with the position they hold, confirm their professional category, and determine whether they can advance to a higher one. This is a strictly summative type of appraisal, meaning it holds teachers accountable by assessing them against standards of teaching, and associating the results with consequences for their careers (OECD, 2013, p. 281). In essence, despite the diversified information about teaching, which such evaluations might be collecting, they are only used as an instrument of administrative control and decision-making, not for staff management. In addition, the appraisal in both countries takes place only every five years, which might not be often enough for a more differentiated, formative use of appraisal results (Figure 2.7).

In OECD and EU countries for which there is information, the reported purposes of appraisal are more diverse. The most common among them is the confirmation of the suitability of new teachers for teaching at the end of a probationary period. Another common purpose is internal performance management (mostly) on the level of schools to inform decisions about professional development, the distribution of responsibilities, needs for improvement, etc. (OECD, 2013). Among the teachers surveyed in OECD Teaching and Learning International Survey (TALIS) in 2013, only a relatively small number reported that there was a link between appraisal outcomes and their careers or salary (fewer than half - Figure 2.7).

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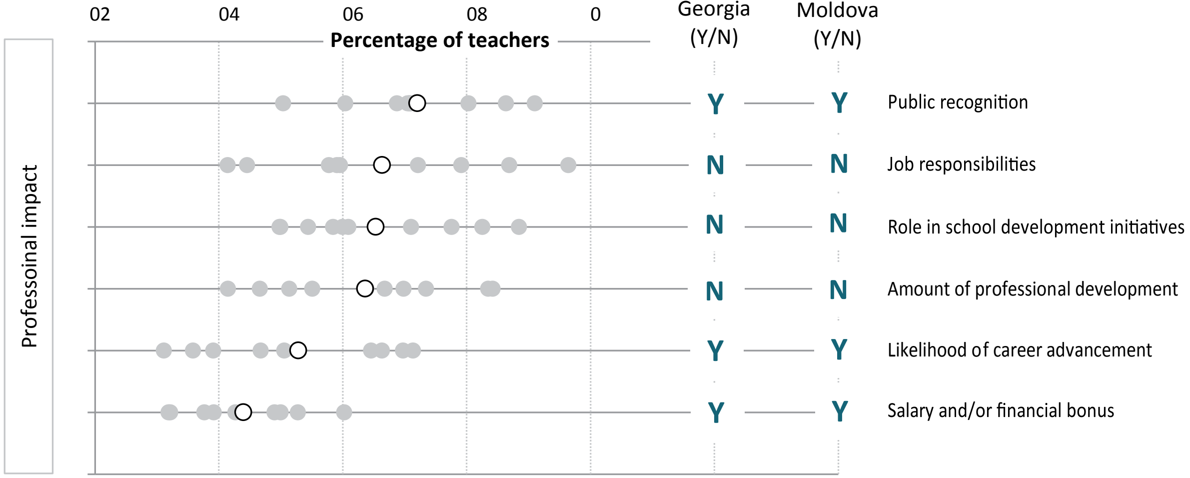
Figure 2.7 Outcomes of teacher feedback in secondary education

The percentage of upper secondary education teachers who report a "moderate" or "large" positive change in their career and work responsibilities after they received feedback on their work at their school [1,2]



Notes:

1. Each dot represents a country value except the white dots that represent the average.

2. Feedback is defined broadly as any communication of the results of a review of an individual's work, often with the purpose of noting good performance or identifying areas for development. The feedback may be provided formally or informally.

3. The information for Moldova and Georgia is approximated through the provisions of the respective legislation and is presented in binary format.

4. All outcomes (except Georgia and Moldova) are ranked in descending order based on the average percentage of teachers who report a "moderate" or "large" positive change in the following issues after they received feedback on their work at their school.

Source of data: (OECD, 2014) (World Bank, 2015) (OECD, 2019)

Another possible reason for distrust in the appraisal outcomes is that the procedure itself is considered a formality that always leads to a positive result.

> *Quote 21: "The attestation process is considered rather bureaucratic by teachers and has very few features that focus on the observation of daily teaching practices."(National INTES report Moldova)*

The people in charge of the attestations comprise the same individuals involved in recruitment (principals of schools and staff from the education departments in charge of the school, such as methodologists, administrators, inspectors, etc.), who have little reason to change the approach they had when hiring and appointing the teachers (or agreeing with the appointment decisions) that they now have to attest. Besides, the regulations do not envisage any form of compulsory external verification of the attestation results.

2.3 Abuse of financial resources: parental donations in Kyrgyzstan and Mongolia

Parental donations to public schools are a long-standing phenomenon across Eastern Europe and despite their potentially adverse impact on the equity, transparency, and integrity of education (Kazimzade & Lepisto, 2010), in many countries, the practice of private donations is not illicit per se. In Kyrgyzstan and Mongolia – the two counties that covered this topic in their national INTES research – donations by parents are in fact permissible and even encouraged. In Mongolia, for instance, in 2019 schools were allowed to receive parental donations for maintenance and capital investment purposes,[7] while in Kyrgyzstan, private donations to schools were recently legitimised under the condition that they are not collected in cash but through the bank accounts of legal entities such as parent organisations.

A scan through the primary evidence collected for this project in both countries shows that, indeed, there is no evidence that parental donations as such are considered illicit, and even less so that they are being embezzled. The integrity problem is rather that the recipients of the donations – teachers, principals, education providers – are instrumentalising them for a range of other integrity violations, which effectively transforms them into bribes. Some of these donation-driven violations are the same in both countries, for instance, donations in exchange for access to education (Table 2.2).

Table 2.2 Integrity violations driven by parental donations in Mongolia and Kyrgyzstan

No.	Typology of illicit conduct (Integrity violations – IVs)	Country	
		Mongolia	Kyrgyzstan
IV1	Illicit provision or denial of access to education	Y	Y
IV2	Improper private supplementary services	Y	No evidence
IV3	Politicisation of education	No evidence	Y
IV4	Undue recognition of student achievement	No evidence	Y
IV5	Favouritism in staffing decisions	No evidence	Y
IV6	Misappropriation of funds in education	No evidence	No evidence
IV7	Procurement fraud	Y	No evidence
IV8	Cheating	No evidence	No evidence
IV9	Accreditation and licensing fraud	No evidence	No evidence
	Parental donations as direct integrity violations	**No evidence**	**No evidence**

Sources: National INTES reports of Mongolia and Kyrgyzstan

Other violations are country-specific, such as direct donations to teachers in the form of cash-based fees for private supplementary services (Mongolia), the abuse of policies regulating parental donations for political purposes (Kyrgyzstan), donations in exchange for grades (Kyrgyzstan), favouritism in the appointments of principals based on anticipated income from donations (Kyrgyzstan), and procurement fraud with the help of parental donations (Mongolia).

[7] Decree No. a/508, as quoted in the national INTES report of Mongolia.

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Typical manifestations of integrity violation

Common manifestations

Donations in exchange for access to education

In settings in which schools need additional funding and have a degree of institutional freedom to select their future students, the prospect of financial and in-kind support by parents can be an important consideration at the stage of admission. Prior INTES research has shown that in such settings, families who can commit to regular financial donations or who can provide a one-off contribution to a school's fund would have a greater chance of securing a place in that school than families which are less well-off (OSF-Armenia, 2016; OECD, 2017; OECD, 2018).

The same observation holds for Mongolia and Kyrgyzstan. In Mongolia, for example, parents donate to schools and individual teachers under the pretext of day-care services. These "donations" are habitually treated as an informal condition for admission to schools, enrolment in classes under the leadership of specific teachers, or for transfers of students to specialised and better quality classes in certain subjects.

> *Quote 22: "My child got poor marks in the entry test to the enrichment class and could not enter it. However, after some time I noticed that those children who did not qualify at that time entered that very same class. I found out later that (the reason was) that I had not given some amount of money to the principal and teachers to get access to the class. I begged the classroom teacher to help, but she said - "no way" (Parent from the Uvurkhangai province in Mongolia)*

While there are many other and legitimate reasons why parents may be asked for a financial contribution, at the time of evidence collection for this project parents were most often donating to secure access to an educational service. The second most frequent reason was the "purchase" of improper private supplementary services (IPSS), such as day-care and private tutoring by teachers from the same school (Table 2.3).

Table 2.3 **Reasons for requesting parental donations in Mongolia, by share of references**

Reason for requesting parental contributions	Share of references
Admission to another class or to a school	31.0%
Improper private supplementary tutoring	13.8%
Classroom renovation and furnishing	9.2%
Contribution to the class fund	9.2%
Buying learning materials prepared by teachers	9.2%
Purchase of expendables	6.9%
Purchasing of printer for a teacher	Reason
Fee for classroom cleaning	4.6%

Art performance contests	4.6%
Paying the salary for an assistant teacher	3.4%
Celebration of holidays	3.4%
Excursion	1.1%
Buying food for teachers who are questors at exams	1.1%
Lending money to teachers	1.1%

Note: Total number of segments=87

Source: Analysis of focus group transcripts, as quoted in the national INTES report of Mongolia

In Kyrgyzstan too, schools may request parental donations as condition for admission. Although payments for admission to public education are illegal, the national report notes that such "voluntary" contributions are a "major practice", especially for admission to sought-after urban schools, where admissions-related donations can range from an average monthly salary to more than ten times the average income of people living in less well-off regions, such as Osh or Batken (Table 2.4).

Table 2.4 Average monthly wages by region and typical parental donations for illicit admission to schooling, in KGS (2019)

Region	Amount in KGS
Maximum donation for admission	118439.55
Issyk-Kul oblast	22207.60
Bishkek city	21081.80
National average	17232.00
Naryn oblast	15944.90
Djalal-Abad oblast	15842.80
Minimum donation for admission	15791.94
Osh city	14866.40
Chui oblast	14723.60
Talas oblast	12968.50
Batken oblast	11582.50
Osh oblast	11368.00

Note: Data on minimum and maximum donations was provided in current USD and converted using the current USD-KGS exchange rate on 18 September 2020 (USD 1=KGS 78.96)

Source: National INTES report Kyrgyzstan and National Statistical Committee of the Kyrgyz Republic

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Although year after year the Ministry of Education and Science (MoES) in Kyrgyzstan encourages whistleblowers to come forward and report such cases, none of those involved in the integrity violation does that because the stakes (i.e. admission to a good school) are too high.

> *Quote 23: "During the focus group discussions, parents discussed such cases as something that they know from "other schools" but not their own" (National INTES report Kyrgyzstan)*

> *Quote 24: "Everybody knows that in school # … they have to pay $500 for the enrolment and they are paying every month 1500 Soms for teachers' salary. And school does not have space to open new classes – children are sitting "on each other's heads…" (A parent from Kyrgyzstan)*

The national report also notes that fact-finding and whistleblowing is complicated by the fact that principals usually mask their requests for parental payments as requests for much needed investments in the maintenance of the physical infrastructure of schools.

Direct donations to teachers in exchange for grades and better treatment of students

In both Mongolia and Kyrgyzstan there is evidence of a connection between the academic success of students as measured by their classroom assessment results, and the readiness of parents to provide donations to teachers. The national reports provide anecdotal evidence of cases in which students whose families refused to (or could not) pay such direct donations, were treated worse than the children of parents who paid. The grades of children whose parents did not pay were lowered, and they also received less attention by the teacher in class.

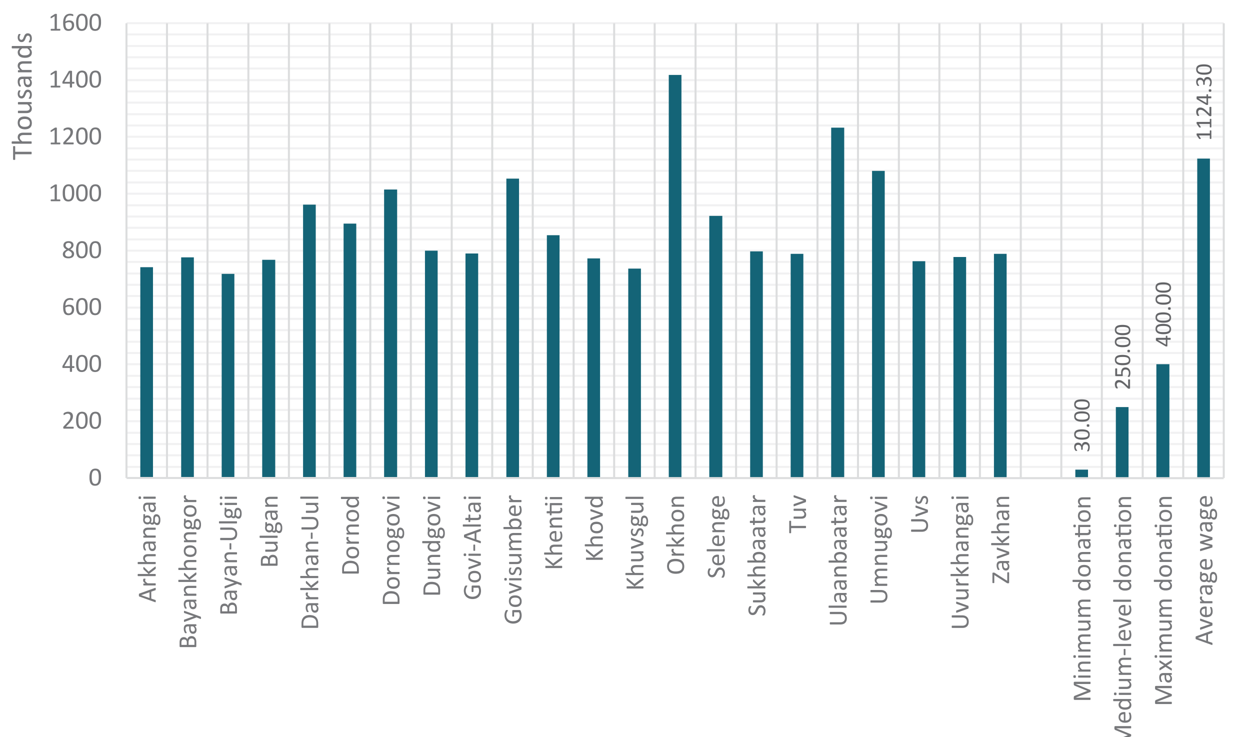
> *Quote 25: "For obvious reasons, information about cases of grade inflation or preferential treatment of some children (i.e. whose family pays more or helps the school in other ways) over others, is scarce. On the other hand there are a lot of stories about complaints about the unequal treatment towards students whose families did not pay the requested parental contributions." (National INTES report of Kyrgyzstan)*

To avoid the appearance of bribes and also to circumvent regulations that prohibit private supplementary payments to teachers for work that they are already paid for as public employees, parents donate in the form of fees for supplementary private classes. In Mongolia, for example, parents are being coerced to donate through additional services provided by the schoolteachers of their children in day-care centres after the (short) school day is over (Quote 26).

> *Quote 26: "Some 75% of the instructors at those centres are former and present teachers. The majority are primary education teachers, kindergarten teachers and Mongolian language teachers. Quite often, it is the schoolteachers providing the day-care services, which means that they have double employment. (There are) teachers doing double duties in addition to the basic work, operating day care without official permission, as well as covering and charging fees from the students they teach,… providing advantages to students who attend day care, and not reporting the income earned… (National INTES report of Mongolia)*

Although the cost of direct donations of this kind can easily amount to more than a third of the income of an average earner (Figure 2.8), the services rendered in exchange are usually of low quality and are not quality assured in any way.

Figure 2.8 **Average monthly wage and typical amounts of direct donations to teachers, in MNT (2019)**



Sources: National INTES report Mongolia and Mongolian Statistical Information Service

Still, for parents the fear of retribution against their children in case of non-participation seems stronger than their concerns about the quality of the tutoring provided (Quote 27) and so in both countries, the practice continues to thrive with their financial support and implicit agreement.

> *Quote 27: "My child's teacher runs day care for her students after the class, renting a two-room apartment. It costs MNT 250,000 a month. The quality of service, especially meals are not good and there is no noticeable change in my child's achievement, so I wanted to quit, but I am afraid of her negative attitude towards my child." (A parent from Mongolia)*

> *Quote 28: "None of the participants in our focus group discussions admitted that this kind of integrity violation is taking place in their own school. However, parents readily provided examples from other schools…" (National INTES report Kyrgyzstan)*

Quality is not the only problem in this context. The conditions of teaching in such supplementary "classes" are also sub-standard, there is no transparency and accountability regarding the purpose of these classes and the progress of students, and the professional circumstances of teacher involvement in such supplementary instruction point towards an obvious conflict of interest, which in both countries is against the law and creates a number of integrity challenges in regular education.

> *Quote 29: "During a school break teachers usually announce and conduct fee-based repetition class to students and it costs MNT 5,000 per hour, each day one or two hours, a total of 5 days, it makes 50,000 per parent. They said they accept it for the sake of their children but are disappointed because alongside this, in many cases the parents… do not have clear information about the purpose, content, volume and its importance. (…)" (A parent from Mongolia)*

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Quote 30: "Our 3 children go to one of the good, first-rate schools. We send the older child to a specialised English language class that the school organises, and (we) pay … annual fees. (...) The quality of the training is inadequate, and we don't know by what policy the school manages it. There were 20 children at the start, and now there are 40 children." (A parent from a first-rate school in Mongolia)

Country-specific manifestations

Parental donations as a vehicle for politicisation and favouritism in Kyrgyzstan

The national INTES report of Kyrgyzstan describes situations in which during election years, the education authorities are using parental donations as a pretext to replace school principals with political affiliates by accusing their predecessors of the misappropriation of funds. This is particularly common for schools that are rich in donations. In this sense, at specific times and in specific cases, the financial support of parents becomes a high-stake policy theme that can play an important role in the appointments of school principals. As the national report puts it, this can be "a process which is often abused for political purposes, as well as for the promotion of relatives and friends to the position of school leaders."

This practice seems to thrive in the context of public discussions on how to address the challenge of parental donations, which ignite discussions ahead of elections, mostly fanned by incumbents and candidates for political office with the purpose of gaining political capital by declaring parental donations "right" or "wrong." The national report suggests that an aspect of this "activity" is that it aims at facilitating the promotion of relatives and friends to decision-making positions in well-off schools, and that in the course of such actions some principals may be declared as "criminals."

Quote 31: "It is not a coincidence that the most "expensive" public schools (meaning schools with the highest annual and monthly parental payments) are always at the centre of these kinds of scandals. (…) It could be stated that there are political as well as material incentives to use parental contributions for political ends, as there are many possibilities to call into question school directors' activities connected with finances including various inspections/checks and even criminal investigations." (National INTES report Kyrgyzstan)

The approach of mobilising public opinion for the replacement of school leaders does not always work out. Every now and then there are cases in which such campaigns fail to gain the desired momentum or create lasting tensions in the professional community of educators because of the popularity of school principals who the authorities are trying to replace. The national report describes one such case from 2019 with a popular school principal of a school in the suburb of Novo-Pavlovka in Bishkek (Quote 32), which was significant enough to have a negative influence on the willingness of some school principals in the capital to participate in the national INTES research.

Quote 32: "At the beginning of 2019 a group of parents from Novo-Pavlovka school accused the director of corruption and the lack of transparency in spending parental contributions (…). The amount of the contribution was quite high for the village, however, this school provided better conditions and technical equipment than many expensive schools in downtown Bishkek.

Another group of parents immediately opposed and made a statement that these accusations were made in order to ensure the director's position for a relative of someone. After street protests

in front of the building of the Ministry and the "White House" (the main administrative building in the country), the Minister of Education fired the accused director. The director filed a lawsuit and was reinstated by a court decision though the MoES never confirmed her reappointment.

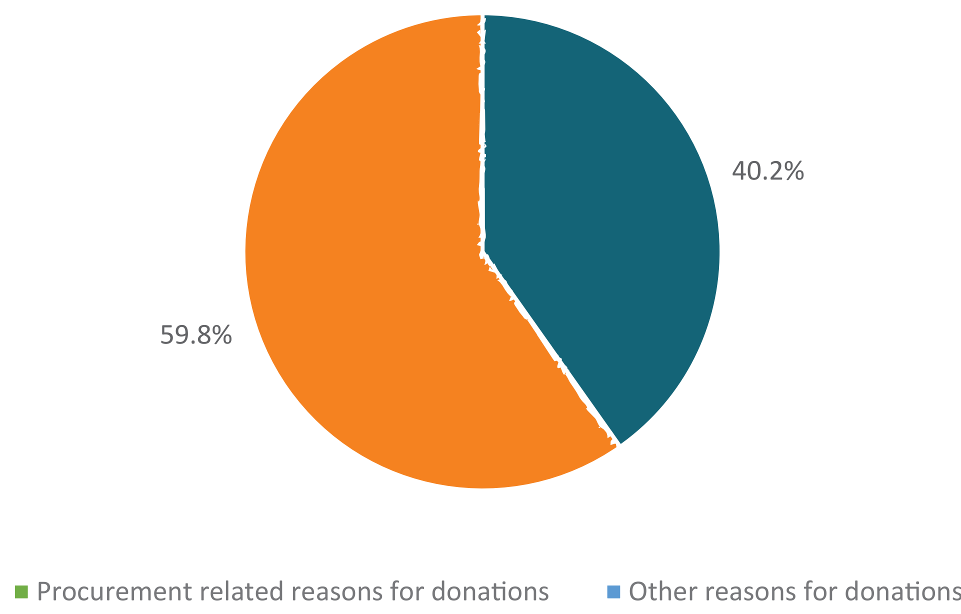
In the meantime, two people have already quit the director's position in Novo-Pavlovka because the teachers of the school did not accept the new principals and the parents are still divided into two opposing groups, which is creating impossible work conditions." (National INTES report Kyrgyzstan)

Embezzlement of parental donations through procurement fraud in Mongolia

According to some of the evidence collected by national researchers in Mongolia, schools may be engaging in procurement fraud with money they collect from parents for procurement purposes.

The procurement of goods (learning materials, stationery, and other expendables) and non-educational services (e.g. maintenance of school infrastructure) is one of the most common reasons for schools to approach parents with requests for financial support. In the INTES focus groups, procurement-related expenses accounted for over 40% of all references to the purpose of parental donations to schools (Figure 2.9).

Figure 2.9 Procurement-related and other reasons for parental donations, by share of references



Note: Total number of segments=87

Source: Analysis of focus group transcripts, as quoted in the national INTES report of Mongolia

In theory, parental payments for procurement purposes should be less problematic from an integrity point of view than donations provided for reasons such as the illicit admission to education or improper private supplementary tutoring. However, there is evidence that at least some of the procurement-related donations may be regularly embezzled by those in charge of procuring the additional goods and services.

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The national INTES report notes that in Mongolia, schools charge parents for classroom renovation in the spring and that the donations may vary substantially between schools. However, there is no clarity whether these resources are really needed and what they are used for. For example, one parent from the capital noted:

> *Quote 33: "A bookshelf, a wardrobe, a water boiler, floor covering, vacuum window, all were purchased with parental donations, but the following year all of it disappeared with the teacher (who collected the money). We had to collect donations to purchase those things again" (A parent from Ulaanbaatar).*

While there is no certainty about the prevalence of this kind of integrity violation, it seems that the lack of transparency and a general atmosphere of distrust surrounding the use of parental donations all contribute to a widespread perception that the money collected for procurement purposes may, in fact, be misappropriated on a more or less regular basis.

> *Quote 34: "There is no reporting back to the parents. Last spring MNT 25,000 was collected from every parent to purchase a curtain for the classroom where my child attends. But after several months the curtain was not purchased. I, myself, asked several times one teacher about the curtain during a parents meeting and through Facebook posts, she refused to respond. (A parent)*

Policy vulnerabilities which facilitate the abuse of financial resources

Shortages due to the inefficient allocation of financial resources

In Kyrgyzstan and Mongolia, the support of parents for schools is not only permissible but also desirable as most public schools are forced to operate in conditions of high stakeholder expectations and stagnating public spending on education. A decade ago, major research by NEPC into parental payments in Eastern Europe established that the perceptions of inadequate school funding are an important factor in explaining the phenomenon and its persistence.[8] Recent data confirms that today, inadequate funding remains a challenge and a token source of justifications for fundraising by public schools in both countries.

On paper, both Mongolia and Kyrgyzstan spend a sizeable share of their public wealth on education. In 2017, Mongolia invested 4.1% of its GDP in the sector, down from 5.2% in 2016. In the same two years, Kyrgyzstan allocated 6% and 6.6% of its national income to education respectively (Figure 2.12). These are substantial percentages in international comparison. In 2016, the latest year for which there is comparative data, OECD members invested 5.0% of their GDP in education on average. In that year, Kyrgyzstan even spent more than the countries that allocated most of their national wealth on education: Norway with 6.3% and Finland with 5.6% of GDP.

In both countries, spending on education has fluctuated substantially over the years, from as high as 5.2% and 7.4% of their respective GDP in 2012 to as low as 4.2% in 2015 in Mongolia and 5.5% in 2014 in Kyrgyzstan. Each year, this certainly brings an element of unpredictability to the financial allocations for education in both countries. Nevertheless, both countries allocate a persistently high share of their public sector budget to education. In 2017, Mongolia invested close to 13% of government spending in its schools and universities, and Kyrgyzstan allocated 15.7%, which in both cases surpasses the average allocations of OECD and EU countries (12.9% in 2016) (Figure 2.10).

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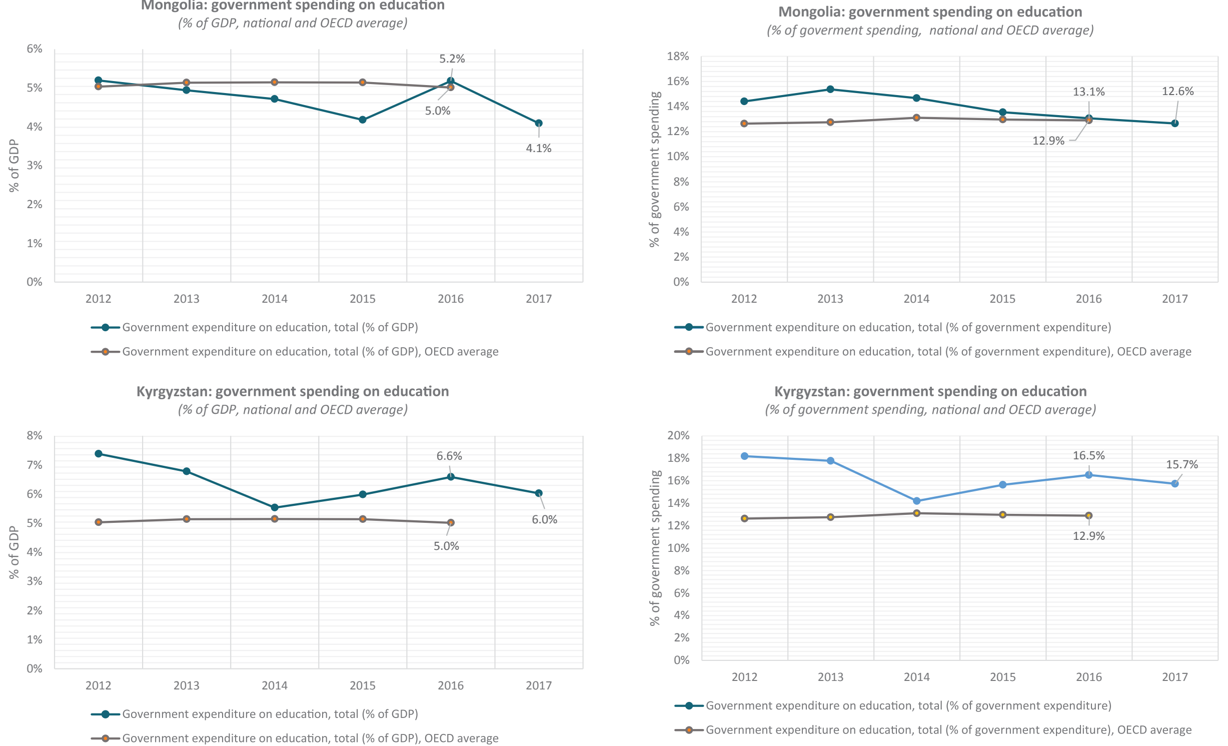
[8] See (Kazimzade & Lepisto, 2010) for a synthesis of findings from all countries covered in that research.

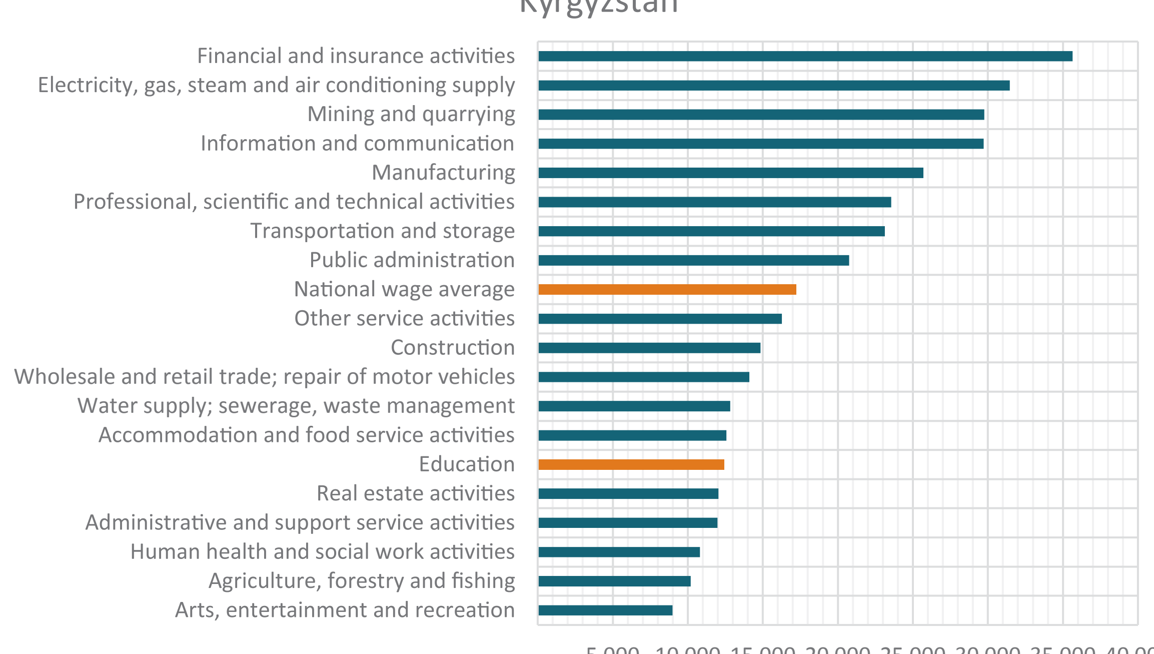
Figure 2.10 Government spending on education in Kyrgyzstan and Mongolia (2010-2019)
Government expenditure as % of GDP and total government spending



Sources: Kyrgyzstan: National Statistical Committee of the Kyrgyz Republic; Mongolia: National Statistics Office of Mongolia; OECD: World Bank Development Indicators

The data presented so far contrasts starkly with the leitmotif of numerous reports and observations that point out how education in both countries is plagued by resource shortages. Statistical and field evidence in support of such statements abounds in both national INTES reports and it also transpires in the official statistics. The salaries of regular teaching staff in both countries are notoriously low – in 2019 mid-career teachers earned more than a third less than workers with comparable qualifications, and wages in the education sector were 20% to 30% below the average national income (Figure 2.11).

Figure 2.11 Wages in education and selected sectors of the economy, Kyrgyzstan and Mongolia, local currency units (2019)



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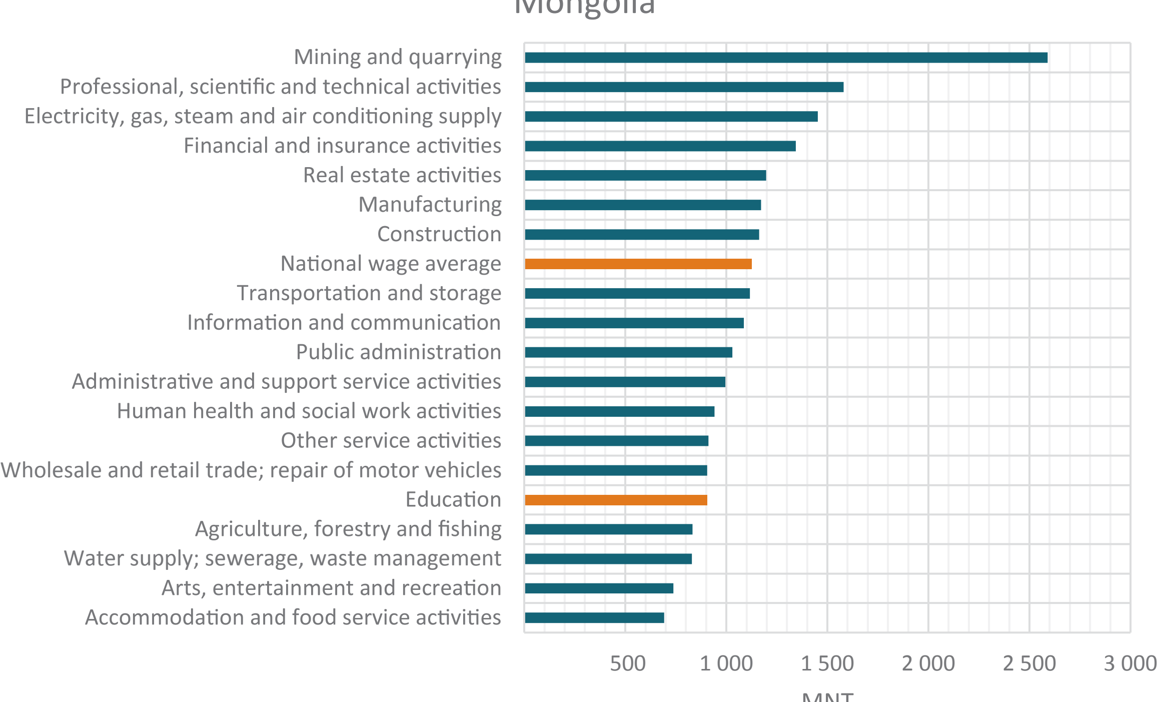

Sources: Kyrgyzstan: National Statistical Committee of the Kyrgyz Republic; Mongolia: National Statistics Office of Mongolia.

At the time of this research, numerous schools in Kyrgyzstan and Mongolia were also in need of capital investment and renovation, and statements by stakeholders and in particular school principals during the evidence collection suggest that education providers across both countries were facing difficulties in covering the expenses of maintaining their infrastructure in line with the expectations of parents (Quotes 35 and 36).

> **Quote 35:** *"If my school remains without parental money, I will have to terminate the contract with a security agency (…) I will also risk being without the cleaners because their salary is extremely low (…) I will probably lose my best teachers (…) There is no other way to cover all these necessary things. And I am talking about things that we need to get on with the (education) process. I have not started discussing computers, projectors or teaching and learning materials yet. The quality of education and the very reputation of the school depended on all of that. And we would not survive without parental money. No way." (A school principal from Kyrgyzstan)*

> **Quote 36:** *"A school budget tracking CSO survey analysis identified that school budgets are not realistic and (that they are) insufficient for the delivery of an efficient service. Only 3% of schools fully provide stationery and supplies for teachers and 47% have no provision from the schools. 36% of teachers get support from parents to purchase materials for effective teaching. Its findings show that budget items for learning materials, supplies, equipment for laboratories, field trips, stationery, books, renovation and maintenance, cleaning supplies, and extracurricular activities are so limited that they are forced to cover them with parental contributions." (National INTES report of Mongolia)*

The combination of spending that is sizeable in international comparisons, and of widespread resource shortages "on the ground" that fuel demand for parental support, is puzzling and raises important questions. Do the financial resources in both countries reach their destination? If so, are they used to best effect? Finally, are the funds allocated where they are needed most?

One obvious explanation can be summarised with the popular aphorism that says that a small piece of a big pie is better than a big piece of a small pie. The relative share of GDP allocated to education

translates into relatively modest spending in absolute terms. Another, even more significant explanation for the discrepancy is that resources are available but are not distributed in good enough ways. Kyrgyzstan, for example, allocates 94% of its already generous education expenditure to the salaries of its teachers, but they still earn considerably less than the national average income, which suggests that this substantial spending effort may be spread thinly across a system which employs an overly large number of teachers: in 2018, the average ratio of students to teaching staff in secondary general education in Kyrgyzstan was a mere 10.6 students per teacher,[9] which is low in international comparisons (in OECD countries that ratio in 2016 was, on average, 12.8 students per teacher).

The national report too underlines that, despite a lengthy transition to a per-student system of planning and allocating resources (called Standard of Budget Financing) that was recommended by the World Bank back in 2010 and is still ongoing,[10] the resources which schools receive are insufficient – partly because the per-student base is too low, and partly because the formula does not account for the cost of utilities, maintenance and capital investment, which are supposed to be covered by the municipal budgets. In addition, the current system of allocations does not apply to the many small-sized schools in rural areas. These schools are still funded on the basis of historic budget allocations, which leads to the replication of historic inefficiencies every year.

> ***Quote 37:*** *"Thus the school budget depends on the number of students, but it does not help to solve all the problems because the money that schools receive for each student is insufficient to cover the necessary expenses in any case." (National INTES report Kyrgyzstan)*

Table 2.4 shows that Mongolia spends a smaller proportion of its current expenditure on teachers, however, they also earn much less in national comparisons. In fact, teaching is one of the lowest-paid professions in the country. Here too, the national report provides information that suggests that the funding arrangements lead to inefficiencies in the resource distribution, which in turn lead to shortages on the level of education providers irrespective of the aggregate amount of public resources allocated to the sector.

The mechanisms of education funding are one source of difficulties in this respect. Back in 1998, Mongolia introduced a per capita funding that provides schools with budgets comprised of three elements: a baseline allocation per student, an allocation for utility costs, and an allocation for social assistance purposes in support of low-income students. The national INTES report notes that, although the system was designed to deliver resources where they are needed, in practice the circumstances of its application prevent it from developing to its full potential. The main problem is the lack of flexibility in the budget formation and execution, as schools have no autonomy to adjust spending to their actual needs (Quote 38). Besides, the baseline allocation has not been indexed for almost four years now and was too low to start with.

> ***Quote 38:*** *"The system leaves almost no scope for school managers to plan and budget as they see fit for the circumstances of their school. Without school autonomy, per capita financing alone has a limited impact on improving efficiency and school accountability. (…) The per-student amount by which schools are financed has to be revised every year to reflect the annual price changes by a Government decision. However, since 2016, it has not been reviewed and apart from an increase in teachers' salaries, no other normative means have been increased to reflect the changing market prices. This pushes school administrators to opt for parental contributions to cope with the budget deficit." (National INTES report Mongolia)*

Another source of difficulties that lead to allocation-related shortages is the politicisation of decisions about the distribution of resources for capital investment from the central budget for education.

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9 UNESCO UIS Database and (OECD, 2020).

10 See for instance (World Bank & OECD, 2010).

The national report notes that there were recent and "drastic" increases in education spending, but that these increases did not go towards the day-to-day expenses of schools as they were driven by the construction of new school buildings and kindergartens. Unfortunately, the decisions where to build these new schools were driven by political considerations and not by the assessment of the local needs for new infrastructure. The INTES report notes that public schools are a source of employment, especially in rural areas, and so schools may be opened in certain locations "to fulfil a political pledge, whether or not a school's location makes sense from a rational point of view."

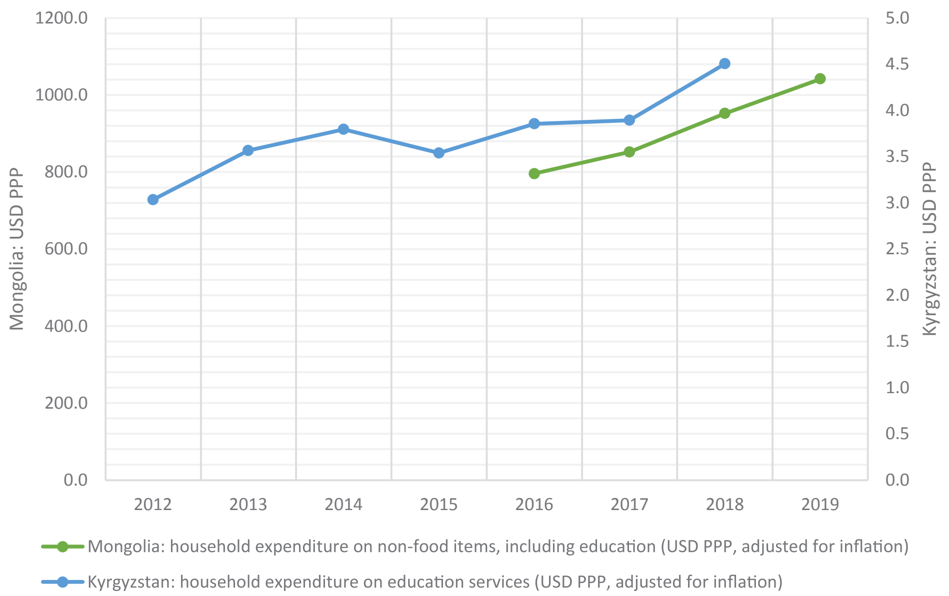
An important consequence of the resource shortage problem in both countries is that teachers, who are the main "interface" between schools and parents regarding school needs and the use of money collected to address those needs, count on the financial support of parents to improve their own income, and not only the availability of resources in their schools. Some researchers even think that this need and the proliferation of the fundraising practice has come far enough for parental donations to be counted as part of the teachers' regular income (Steiner-Khamsi & Harris-Van Keuren, 2009; Kazimzade & Lepisto, 2010).

Although the conduct of teachers is paramount for the integrity of their institutions, the scarcity of resources puts them in a position of dependence and personal bias. Willingly or not, they become instrumental in the proliferation of a culture of acceptance and the normalisation of private informal payments into the public schooling system, and of practices that lead to the use and abuse of these payments.

Lack of adequate regulations regarding private donations

Considering the discussion so far, it should come as no surprise that household investment in education in Kyrgyzstan and Mongolia has been on a steady rise over the years, even after adjusting for inflation. In Mongolia, private spending on non-food items including education has grown by 53% since 2016, while in Kyrgyzstan in 2018, families have allocated 49% more to education than they did in 2012 (Figure 2.12).

Figure 2.12 Household spending on education in Kyrgyzstan and Mongolia (2010 - 2019)
Household spending per month in USD PPP, adjusted for inflation



Sources: Kyrgyzstan: National Statistical Committee of the Kyrgyz Republic; Mongolia: National Statistics Office of Mongolia

The integrity vulnerability with that is not the fact of donations itself, but rather that these donations flow into the public schools without adequate safeguards and proper transparency although they account for a considerable share of the operational funding of schools and are often provided in an atmosphere of distrust.

In Mongolia, schools are allowed to receive parental donations for a clearly defined list of reasons, such as hygiene and safety, classroom renovation and maintenance, etc., and schools have an obligation to report these donations. However, the national report notes that there are no monitoring mechanisms to verify compliance and that the reporting obligations are partial. School principals for instance are not obliged to report about the use of donations, only teachers. This puts teachers in a difficult situation because, as noted in the national report, most donations are collected by teachers on behalf of the school leadership and are also used by the school leadership. Teachers are often not aware of how the donations are being used and they are also not in the position to hold their superiors accountable and request them to provide that information.

> ***Quote 39:*** *"There is no rule for accountability and financial reporting about parental donations in support of their children's schools. The amount received from parents is never recorded in the school's financial statements, so the school's accountant and principal are not accountable to anyone. The education department and the state treasury fund are not obligated to demand reporting about parental donations. The school inspectorate only ensures whether prohibited illegal payments have been made or not to the school by the parents." (National INTES report of Mongolia)*

Another regulatory weakness is that schools avoid registering the donations officially and run them through their bank account with the State Treasury to avoid burdensome procedures, as well as the associated accountability pressures. It is remarkable that they are able to do so and bypass this particular obligation, which in essence allows them to treat the additional resources they receive from parents as informal support and thus bypass the official form and requirements of reporting. An aspect of this problem is that there are also no provisions that might restrict the use of equipment purchased with parental donations for private purposes by school staff. Finally, the national report underlines that the wording used in the regulations is too vague to prevent integrity problems "on the ground" (Quote 40):

> ***Quote 40:*** *"In (the) current documents some terms are very generic, which can (lead to) abuse. For example, donations are supposed to be voluntary and willing. Assistance and support can be in any form such as monetary, material, and emotional, etc. In reality, schools and teachers insist parents give monetary donations, support, and assistance." (National INTES report of Mongolia)*

> *Similar regulatory and compliance weaknesses are present also in Kyrgyzstan. Although the laws prescribe similar obligations as in Mongolia to collect, declare and handle donations officially through bank accounts, the national report notes that most of the use of donations is through cash payments because of the otherwise burdensome administrative and procurement procedures.*

> ***Quote 41:*** *"The strict and inconvenient conditions of using official accounts also motivate parents and administrators to avoid them. At the same time, the lack of clear procedures and proper control over the spending of parental money provides many opportunities for integrity violations such as the misappropriation of funds and procurement fraud." (National INTES report of Kyrgyzstan)*

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Such cash payments are documented through receipts and other papers that are difficult to trace and understand, and easy to falsify. The proportion of donations that is spent through the banks is also difficult to control because the accounts with the donations are commercial and thus protected by privacy laws.

Country-specific structural and policy weaknesses

Resource shortages and regulatory gaps are not the only drivers of integrity risks around the private investment in public education. The 2010 NEPC cross-country study points out a number of additional reasons such as the low quality of teaching and of education in general, missing learning materials; peer pressure to donate; and others (Kazimzade & Lepisto, 2010).

Some of these non-monetary factors identified by the NEPC study have remained powerful drivers of problematic conduct over the years. One example is the peer pressure motivated by the prospects of undue personal benefit for teachers. In Kyrgyzstan, parents feel compelled to donate as a pre-emptive measure against the possible discrimination of their children in the class. Some of the cases recorded by the research team suggest that their concerns are justified (Quote 42). Teachers too may feel pressured by their peers to fundraise (Quote 43).

> ***Quote 42:*** *"The most extreme case in this respect was covered by the media and happened in 2017 (Sputnik KG, 2017). A student from the 7th grade (13 years old) was lost for 3 days. He quit school but did not come back home. After 3 days the police with volunteers found him in an abandoned house. The boy complained that he was humiliated and threatened to be excluded from the school because his family had not paid regular contributions." (National INTES report of Kyrgyzstan)*

> ***Quote 43:*** *"Of course teachers should not pay attention to that. However, a payment by a student means that the teacher can receive an allowance and vice versa – a student who does not pay means that the teacher does not get an allowance. So, the head teacher pressures responsible teachers (klassnyi rukovoditel) to collect money and in turn, these teachers put pressure on the child…" (A teacher from Kyrgyzstan)*

The integrity angle of the INTES methodology allowed national researchers from both countries to complement the list of known reasons with an abundance of additional observations and data. They point towards a rather precise set of additional vulnerabilities that promote the misuse of parental donations for integrity violations. Despite the commonalities in most forms of illicit conduct involving parental donations, the additional vulnerabilities enabling that conduct differ between countries.

For instance, the abuse of donations for illicit access to education in Mongolia can be traced back to concealed school enrolment capacity shortages after a rapid expansion of enrolment due to reforms for promoting universal access to education. Data suggests that the reform itself was a success, but that this was achieved by allowing multiple, excessively short school shifts (e.g. schooling days of four hours etc.) and overcrowded classrooms.

In comparison, in Kyrgyzstan, the driver of misuse of donations for illicit access is the absence of reliable data about school performance, which leads to the proliferation of perceptions that some schools are much better than others. The national report suggests that there are too few schools that are perceived as being of good quality, which creates competition for places in such schools and

provides their principals and the parents of prospective students with a matching set of incentives to agree about the need for "voluntary" donations in exchange for admission. The integrity violation is facilitated further by the absence of clarity about admission procedures and the lack of sanctions for bypassing them.

The two countries also differ in the shortcomings which enable direct payments to teachers, for instance in the form of improper tutoring services through parental donations in Mongolia. The key policy shortcoming promoting the practice in that country is the short school day, which leads to an insufficient number of hours for teaching in regular classes, especially in high stake subjects such as mathematics, literature, the Mongolian language, etc. In addition, the low number of teaching hours provides teachers with ample time to engage in additional, financially rewarding activities even if they are problematic from an integrity point of view. The practice of teachers in Kyrgyzstan to discriminate against students whose parents refuse to pay, on the other hand, can be understood from the point of view of the usual considerations about the substandard income of teachers.

> Quote 44: *"It is a shame that parents who have not yet paid are repeatedly reminded and called by their children's names through the parents' Facebook group." (A parent from Mongolia)*

When discussing integrity vulnerabilities, another important topic emerged – the quality of education. According to national reports, public perception is that quality of education is low and that education does not provide children with competencies needed for a rapidly changing world. In the case of Mongolia, this kind of perception motivates parents "to enrol their children into enrichment classes to increase their achievement and increase their chances to enter a university."

> Quote 43: *"I adapted to the situation, I paid money for enrichment classes for my child. I think my child is lucky to have this kind of opportunity and he likes it. It is a good thing for my child, so I paid for it, it is common practice here." (A parent from Mongolia).*

A similar mechanism was reported in Kyrgyzstan, where there is a difference in the quality of education across the schools and some schools are considered to provide a higher quality of education.

> **Quote 44:** *"There is a huge difference in the amount of money collected in some schools in the centre of Bishkek and schools in new residential/suburban or rural areas. It may vary between 30 Soms (KGS national currency) which is about ½ of 1 USD and 500-1,000 Soms (8-12 USD) per month not including annual or enrolment contributions that may reach 500-1,000 USD per family. Access to prestige and so-called "elite" schools is limited by money, though children should be formally enrolled in a school according to the territory where they live." (Kyrgyzstan National Report)*

In both cases, parents need to ensure their children's well-being in cases where the quality of education differs across the school. This gives parents a strong impetus to "donate" to the schools.

Finally, one more noteworthy but less discussed gap is the practice of classroom assessments, which are prone to arbitrariness and bias. The politically motivated replacements of principals under the pretext of addressing problems with the misuse of parental donations suggest the presence of weaknesses in the regulations about the appointment and dismissal of staff, while the procurement fraud with the help of parental donations in Mongolia is greatly facilitated by accountability shortcomings. As already noted, they include the absence of written records about the donations and the fact that schools have no obligation to report about the way that they use them.

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Chapter 3. Cross-country weaknesses and pointers for action

3.1 Shared weaknesses

Education policy reforms as a dominant contextual commonality

A leitmotif running through all the national reports is a context of long-term reforms, which have commendable goals but are also wide-reaching and ambitious enough to have the potential to disrupt established ways and practices in education in all countries participating in this research. A remarkable feature of these reforms is that they have all been initiated to close the very gaps that this research has identified as the primary policy drivers of illicit conduct in the management of human and financial resources in education.

In Moldova, the national report describes reforms that aim at the introduction of performance-based attestation of teachers as well as competitive recruitment procedures for their appointment. In Georgia, the newly implemented policy for the recruitment, promotion, and dismissal of teachers has been identified as the primary source of concern in terms of integrity vulnerabilities. In Mongolia and Kyrgyzstan, the adoption of per capita funding in education, which was meant to boost the efficiency of education spending, has instead led to resource shortages, and in addition, the expansion of enrolment in Mongolia has also resulted in enrolment capacity shortages across the education system. At the same time, all four countries have introduced comprehensive anti-corruption strategies with a strong reference to the education sector, and in all, these strategies are still not gaining the desired traction (Transparency International, 2019).

Integrity vulnerabilities as a legacy of reforms

These contextual observations justify a critical question: to what extent is the abundance of integrity vulnerabilities in the four countries the legacy of the very reforms that were introduced to address them?

With this in mind, the cross-country insights that this INTES exercise has delivered so far may seem disappointing. The results confirm the existence of well-known gaps in areas that are known to need improvement. Different as they are, the four countries in our research are struggling with a comparable range of challenges that lead to a comparable degree of system-wide integrity risks.

What is considerably more interesting is that these areas are “still around” despite decade-long reform efforts to address them. A number of pre-existing, long-standing problems remain unresolved despite all commitments and efforts, such as the shortage of financial resources for the day-to-day operations of schools in Kyrgyzstan; the shortage of teachers in Moldova and now Georgia, especially in rural areas; the precarious employment conditions in education in Moldova and Mongolia; and the considerable limitations in enrolment capacity in Mongolia, which schools are compensating for with the help of excessively short shifts.

Table 2.5 An overview of reform gaps of significance for integrity

Reform gaps		
Partial implementation	Disruption and missed target	Poor planing and design
Mongolia: Rapid, but uneven expansion of education coverage	**Georgia:** Reform amplified teacher shortages instead of addressing them	**Georgia:** Excessively short time for recruitment of new teachers before the school year
Moldova: Recruitment policies left without implementation rules in the long-term	**Kyrgyztan:** hortages despite per capita funding due to a low normative baseline	**Mongolia:** Decisions about building new schools are based on political considerations
	Moldova: New attestation procedures did not lead to a merit-based evaluation of teachers	

In a way, the INTES assessments in the four countries revealed much more about the gaps opened by education policy and reforms over time than about the illicit conduct that fills these gaps. The reports describe examples of the partial implementation of reform intentions as in Mongolia, where education coverage has expanded rapidly but unevenly, and in Moldova, where for some years now the new teacher recruitment policies have been left without rules for implementation.

The national research also provides information about the disruptions and missed reform targets as in Georgia, where the teacher reform amplified the teacher shortages instead of addressing them, or Kyrgyzstan where per capita funding diminished the resources for schools instead of distributing them more efficiently because the baseline per-student amount of the state grant was set too low to address the funding needs of the schools.

Finally, there are instances of poor reform planning and design, as in Georgia, where the time for recruiting new teachers was excessively short, and in Mongolia where the decisions about new schools are justified by the need for expansion, but remain politically motivated and do not take into consideration the enrolment needs on the local level.

3.2 Recommendations for follow-up action

The national reports offer a wealth of guidance for action that is country-specific but features elements of significance from a cross-country perspective because it describes ways of creating shared responsibility for integrity among stakeholders on a grassroots level. Below is an overview of

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these recommendations, organised in eight points for action. These points are drawn from the four countries' reports and reproduce them where appropriate.

Recommendation 1: Introduce structural changes to address resource shortages

It is recommended to revise and improve the mechanisms for the planning and the distribution of resources – human and financial – in ways that allow a resource demand by education providers to be met where it emerges. The basis for such revisions should be a sound planning of enrolment capacity according to local demand and the allocation of staff positions that is in balance with both the number of students and the available resources for their remuneration.

The national report of Mongolia also recommends revising the financing formulas to bring them closer to the reality of education provision, for instance by optimising the allocations for wages, investing in social protection and student safety, and also mobilising the donations of parents in ways that allow them to complement the gaps in public funding more efficiently.

Recommendation 2: Invest in trust-building measures with the help of quality assurance reforms

Distrust is a strong driver of integrity risk (Milovanovitch & Lapham, 2018). In all countries covered in this research, there is an acute lack of reliable and objective information about the quality of education delivered by teachers and schools. This fuels distrust and creates situations of information asymmetry in which parents may resort to pre-emptive action in the form of payments for additional and often illicit services such as improper private supplementary tutoring, donations in exchange for better grades, payments for admission, etc.

The INTES report of Kyrgyzstan notes that a way to remedy this information asymmetry is to create a basis for the provision of trustworthy information about the outcomes of education, specifically the performance of education providers by developing a new generation of multidimensional (multifactor) school evaluations. These evaluations should take into consideration not only the dimensions of performance that are of importance to authorities, such as compliance with regulations but also such that matter to beneficiaries and stakeholders, i.e. parents, such as learning outcomes, learning atmosphere, the safety of the school environment, the transparency of procedures, trust between parties, etc. This will help parents make informed school choices and understand better whether schools really need their support for education quality reasons and if so, what kind of support.

The report from Georgia expands upon the same priority, suggesting that it is time to create an effective system of performance-based school evaluations that also takes into consideration the qualifications and performance of teachers. The suggestion is to include that in the school evaluations with a focus on the quality of the teaching process, student achievements, teachers' professional development, etc. The report notes: "school principals will be motivated to pay special attention to quality teaching and therefore, will be discouraged to get involved in different integrity violations."

Such trust-building measures should be complemented by the granting of access to the financial reports of schools, which also implies that schools should be provided with the capacity for financial management on the institutional level in order to prepare such reports and lead their own accounting.

Recommendation 3: Increase autonomy in exchange for greater accountability

In all countries, it would be important to strengthen control over the processes that involve decisions regarding the use and allocation of human and financial resources, while at the same time ensuring that providers are supplied with clear regulations in this respect, as well as with guidance on compliance with these regulations.

Specific targets in this respect must include regulations and autonomy concerning the provision of supplementary educational services, the appointment of staff, the execution and rebalancing of school budgets (including the provision of greater flexibility with the use of money donated through the treasury accounts of the schools), and most of all the proper and realistic regulation of private donations in education.

Recommendation 4: Depoliticize decision-making processes by promoting transparency through the involvement of media

One of the national reports (Kyrgyzstan) suggests that journalists and opinion makers (bloggers and social media activists) should be trained to maintain and provide the public with a critical position on materials concerning the use and abuse parental contributions.

This recommendation can be expanded to all other countries and could also include a focus on the manipulation of staff appointments and the hiring of candidates who do not qualify for their positions in education. The report further notes "as far as this issue becomes a matter of manipulations just before elections and is often used for political campaigns, it is important to help people to form their own position on that matter instead of "taking sides" without critical observation."

Recommendation 5: Address the shadow provision of services by improving the conflict of interest regulations

In their national INTES report, the team from Mongolia underlines that there is a need for a coherent and clear set of regulations regarding the conditions of provision of paid supplementary services in education, such as those delivered in the day-care centres. The purpose is to avoid the conflict of interest of teachers working in such settings and to introduce the minimum standards of quality for the service. Similar suggestions are formulated in the report from Kyrgyzstan: even where paid supplementary services are regulated, control tends to be weak and needs to be reinforced.

More and stricter regulations alone will not resolve the challenge, not unless there are also mechanisms to support compliance with such regulations. At the core of the integrity problem with supplementary services is the conflict of interest of teachers as public employees. In this sense, measures addressing the shadow provision of services must also feature a focus on the provision of support for them in the form of incentives, guidance, and the possibility to seek consultation about how to identify a potential conflict of interest and act upon it. This includes the creation of conditions in which they can act upon that without fear of being disadvantaged.

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Recommendation 6: Encourage and protect whistleblowers

The Council of Europe defines whistleblowers as persons who report or disclose information about a threat or harm to the public interest in the context of their work-based relationship, whether it be in the public or private sector (Council of Europe, 2014). Data on whistleblowing in education is still scarce, but where it is available, it suggests that there is a sharp rise in cases especially concerning high stake situations such as exams and grading.[11]

The integrity violations discussed in this report are systemic and thrive through the participation of numerous people who have various roles as education participants. Although most of them would not have an incentive to disclose their involvement in problematic conduct, some may be willing to act differently and preserve their professional and personal integrity by "blowing the whistle" on the integrity violations they are witnessing.

Providers and education authorities should create the conditions for that to happen by ensuring that there are open channels of communication and legal arrangements that can protect such people by safeguarding their anonymity and shield them from professional reprisals. Some of the countries in this research (Mongolia) recommend the establishment of fair and efficient hotlines to ensure that signals about irregularities can be properly shared and communicated on the different levels of governance, for example.

Recommendation 7: Strengthen participatory governance

As discussed, some of the integrity-related policy problems can be traced back to policy gaps caused by partial or failed reforms in the education sector. The list includes the financial management reforms in Kyrgyzstan and Mongolia, the incomplete overhaul and hasty implementation of staffing reform in Georgia, the recruitment methodology in Moldova, etc.

Education reforms may be incomplete or ill-planned for a number of reasons, but one of them is the lack of shared purpose and ownership between those involved in the reforms. It is therefore recommended to ensure that, as the research team from Georgia puts it, the "planning and implementation of policy changes is a participatory process" that should involve practitioners and beneficiaries early on to ensure that the initial stages of reforms lead to good planning decisions. The involvement of parents and community players in governance and decision making as well in the monitoring of services is thereby particularly important.

Recommendation 8: Promote a culture of integrity on the level of education providers

In the INTES report of Moldova, the national research team suggests that it is high time to undertake measures to transform the anti-corruption strategies and commitments into "a constituent element of the organisational culture" of schools. The focus should be on strengthening the professional integrity of staff with the help of a combined action to improve their working conditions and introduce binding anti-corruption rules on the level of education providers, i.e. Codes of Ethics. Directly or indirectly, the national reports converge around that point, which in essence recommends the promotion of a culture of integrity in schools through a combination of structural, regulatory, and good practice interventions.

[11] See for instance the recent discussions in the UK: https://www.theguardian.com/teacher-network/teacher-blog/2012/dec/10/whistleblowing-schools-teachers-malpractice

3.3 Conclusion

The purpose of this INTES research is not to cast blame but to deliver evidence and insights that could facilitate and guide subsequent action by identifying areas of education policy and practice in need of improvement, both for the sake of integrity and for the sake of progress towards better, more equitable and inclusive education. Efforts to prevent illicit conduct will depend on how well they address the underlying policy problems in the areas of teacher and financial resource management.

The cross-country synthesis offers several pointers in this respect, which pointers share several common features. The first feature is that the discussion of human and financial resource shortages is a discussion about the proper distribution of resources, rather than just one about their absence. In most cases, the countries that participated in this INTES research are already operating at the limit of what is possible in terms of public spending on education. It is time to look into ways of empowering school providers to use the public and private resources that are already in education for their own purposes and more efficiently than is the case now.

The next feature is based on the certainty, which this research has delivered, that the integrity angle may help to reassess the impact of some education reforms and discuss ways to remedy that impact in case it is adverse. The discussion of integrity offers a new take on old challenges and may provide the justification for the reopening of issues and problems that are considered closed or too difficult to tackle. For this to work, it is important to use the INTES findings and reporting for follow-up research that would be more focused on the very problems identified so far.

In the same vein, efforts to prevent illicit conduct in all four countries will depend on how well these efforts will manage to address the underlying policy problems in the areas of teacher and financial resource management. Education participants have a good reason to do what they do, and even if their conduct is problematic from an integrity point of view, it is worthwhile investing in the understanding of these reasons in view of designing evidence-based responses that address their concerns and expectations as education stakeholders.

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Annexe: implementation of the INTES methodology on a national level[12]

The national reports covered by this synthesis rely on a methodology for the assessment of the integrity of education systems (INTES), which was developed in the framework of the OECD by the Center for Applied Policy and Integrity and has guided education integrity assessments and research since 2010.

The declared aim of INTES is to help national authorities and stakeholders understand the policy-related conditions under which corruption in their education systems thrives and support the development of solutions that improve these conditions in ways that prevent malpractice at its roots. The approach follows the assumption that integrity problems and corruption in education are not phenomena that affect the sector "from outside" but are a consequence of deeper-rooted problems in the education system itself, which can (and should) be addressed with the means at the disposal of decision-makers, practitioners and stakeholders in that sector (OECD, 2018).

The INTES methodology seeks to deliver answers to two questions: whether participants in education engage in corrupt practices and if they do, how the conditions in which they participate in education may play a role in that (Milovanovitch, 2020). The focus is on the ways in which policies and practices in education may create opportunities and incentives for education participants to engage in corrupt conduct.

The scope of "corrupt conduct" may include practices for which there is criminal liability as well as softer, sector-specific actions, which are harmful, but may not qualify as corrupt by international standards. Both types of practices are subsumed in the notion of "integrity violation": an action which is intentional, systemic, involving education participants in professional positions (e.g. administrators, principals, teachers), and contradicting the values and principles that apply to the education sector of the country under assessment (OECD, 2018). The national reports follow thereby the 2019 update of the INTES typology of integrity violations.[13]

In line with the INTES methodology, the national reports also gathered evidence about the vulnerable areas in education that create the conditions for integrity violations to thrive, with the purpose of informing practitioners and decision-makers on how to change these conditions for the better. "Vulnerable areas" are defined as weaknesses (shortcomings or gaps) in education policy and practice that may provide education participants such as teachers, principals, parents and education administrators with the opportunities and reasons to engage in integrity violations (Kovac Cerovic, Jovanovic, & Milovanovitch, 2019; OECD, 2018).

On the national level, the methodology of this research comprised three phases: desk research, primary evidence collection through focus groups and dynamic storytelling, and in-depth follow-ups in the form of semi-structured bilateral and group interviews in each country. The application of these steps varied across the countries to account for specificities in the local contexts, as described below.

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12 Reproduced from the national reports

13 For the latest update of the INTES typology see www.policycenters.org/INTES

Georgia

"The aim of this study is to identify the opportunities and incentives of favouritism in the schoolteacher hiring process in Georgia and provide relevant policy recommendations. The rationale for choosing this specific integrity violation is the current large-scale reforms of schoolteacher recruitment and dismissal process in Georgia. It was interesting to observe and evaluate the ongoing process in order to prepare policy recommendations and help policymakers to remedy any flaws discovered during the assessment.

Qualitative research methods and an analysis of secondary sources were utilised in order to study favouritism in staffing decisions. This report was prepared based on desk research that covered existing literature related to this topic and published articles, interviews, television appearances, similar studies done by other countries, and national legislation.[14] Public information regarding the number of vacancies announced, the number of people hired, any complaints received by the ministry and its centres, was solicited from the Ministry of Education, Science, Culture and Sports of Georgia (MoESCS) and its various centres. However, the Ministry did not provide the solicited information. The response letter received from the Ministry stated that they are not collecting information about competitions held in public schools.

The INTES assessment is also based on the information collected from focus group discussions and in-depth interviews. Focus group discussions (hereinafter "FGD") were held both in the capital and in regions including a region with ethnic minorities. It was important to cover regions that have ethnic minorities since in general, favouritism is more widespread in those regions because of their small size and small populations who are either relatives or have different kinds of relations, and also because of the limited access to public information and lack of knowledge of the Georgian and/or English language in these regions. According to the research "Ethnic Minority Students and University Graduates Professional Development, Career Advancement and Employment Opportunities and Perspectives" conducted by the Centre for Civic Integration and Inter-Ethnic Relations "… students emphasise the importance of a wide circle of acquaintances for employment opportunities and think that nepotism is more important than education and professionalism… a wide circle of acquaintances influences employment opportunities in ethnic minority communities much more than generally in Georgian society" (Gorgadze & Tabatadze, 2017, p. 69).

For the FGDs we decided to select teachers who went through the schoolteacher recruitment process. In the FDGs we mixed teachers who were hired, teachers who were rejected and those who had been rejected by one or more schools but hired by another one. We wanted this diversity in participants in order to hear different perspectives and ideas, and also to let participants hear each other's ideas and start meaningful discussions. We did not include school principals and/or other officials in the FGDs with teachers to avoid asymmetric power relations that might have caused the silencing of some FGD participants.

In order to select FGD participants, we utilised a nominations strategy. We asked our partner institutions (the Educators and Scientists Free Trade Union, universities and schools) to gather focus group participants for our study because they collaborate with different groups of teachers including those that would suit the above-mentioned predetermined criteria. In-depth interviews were held with school principals, deputy principals, Teacher Professional Development Centre (TPDC) representatives, MoESCS representatives, schoolteachers (who expressed their wish to participate separately in an interview instead of a focus group) who participated in the hiring process, as well as educational experts. School principals for in-depth interviews were chosen from the list of schools that had announced vacancies (See Table 2).

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[14] Please find the list of the researches, studies and legislative documentation in the bibliography section.

Table A.1 In-depth interview participants

Principals	6 (4 principals from regions and 2 from capital)
Deputy principals	2
Ministry representative	2
National Centre for Teacher Professional Development Representative	1
Education expert	2
Teacher	3 (2 from regions, not hired; 1 from the capital, rejected/hired)
Total	16

Approximately 10-12 people participated in each Focus Group Discussion. Three FGDs were held with 29 participants (12 from the capital and 17 from the regions). Out of 29 participants, 17 were hired, 2 were rejected and 10 were rejected by one or more schools but hired by another one (See Table 3). We also had two more FGDs planned, one in the regions and one in the capital, however, these FGDs were cancelled since only a few participants came to the meeting. We transformed these FGDs into in-depth interviews.

Table A.2 Focus group participants

Focus Group	Number of Participants	Capital	Region	Hired	Not Hired	Hired/not Hired
1	11	11	0	9	0	2
2	10	1	9	4	2	4
3	8	0	8	4	0	4
Total	29	12	17	17	2	10

The research data was collected in September and October 2019. The data was analysed, and the initial report was drafted in November and the first half of December 2019."

Kyrgyzstan

"The main focus of our research is on parental contributions: voluntary (at least formally) payments that schools collect to support their on-going functioning as well as provide some educational services. Obviously, the last two types of violations: (8) Cheating and (9) Accreditation and licensing fraud are not so easy to connect with the issues of parental contributions. However, all of the others (no. 1-7) fit into the purposes of our analysis that aimed at the identification of the misuse of parental money as well as the fair justification of the very need of fees. It actually shows that parental contributions facilitate all of these violations in specific ways: this money helps schools to cover necessary expenses that are not officially provided, however, control over this money remains very fragile.

This approach helped to describe the structure of the integrity violation of educational systems that includes the incentives to breach existing rules as well as the opportunities to do so. Both of these structural components are rooted in policy shortcomings either in legislations or/and in

procedural practices. For instance, a lack of funding is a strong incentive for fraud and the search for illicit kinds of financing. On the other hand, the unclear instructions of state budgeting lead to the informal or even illegal practices of money distribution. Hence, the degree of violation might be put within a continuum starting with problematic conduct and leading to criminal activities through some administrative offences. For example, misconduct or administrative problems may be part of spending money without proper documentation for reporting or using substitutive financial documents that do not reflect real purchases (to cover tax expenses or reflect another product that is not necessary for school yet fit official reporting forms). However, it may sometimes be part of the fraudulent schema with false prices reflected within documentation in order to conceal part of the parent's money for theft by the people responsible for a purchase and this is already a real criminal activity in the field of parental contribution.

In order to analyse the parental contributions to public schools from an integrity point of view the data was collected from different sources: (1) the media materials and discussions in social media were used to analyse public opinion and discourses about parental contributions in public schools; (2) the legislation and normative framework along with interviews experts were used to analyse the existing orders and rules for financial management in schools; (3) in-depth interviews and focus group discussions with dynamic storytelling techniques to explore the practices of parental contributions in various schools.

To study practices in more detail, case studies of schools of different types were conducted: an "elite/expensive" school, a kind of "average" municipal school and two schools with a low level of parental payments in new urban districts ("novostroika"). The next section is devoted to our findings in the functioning of parental contributions in each of these school types.

Within each school, the directors were interviewed (in-depth interviews) and one focus group discussion (FGD) took place with parents-activists involved in money collection, distribution and control. The "elite" school included 39 participants working in small groups and sharing results during the joint discussions. The same schema was applied to the "average" school with the 20 parents that came to the meeting. The FGD in novostroikas involved eight parents in the first school and 40 in the second.

In addition, three semi-structured interviews were conducted with experts: one financial specialist from municipal administration and two school accountants.

The interviews and focus-group guides as well as samples of the stories used for dynamic storytelling are in the Attachments."

Moldova

"In addition, this study applied qualitative methods in the form of literature and policy reviews, which were supplemented by focus groups and interviews. The documents were analysed based on the objectives enshrined in the Code of Education, which contains explicit provisions regarding the academic integrity and ethical behaviour required both by teachers and managers, as well as of the parents. The enforcement of new provisions was examined by the extent the subordinated legislation includes specific words, zero tolerance to corruption, transparency, integrity, and honesty, thus contributing to the promotion of integrity practices in schools. These selected words define the ideology/philosophy of the texts from the perspective of promoting a culture of integrity in education, which is essential for determining the orientation of the consequent reform.

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The research started with a desk analysis that included the national legislation, local studies, researches, and articles in the mass media. A list of normative acts was scanned for the sensitivity to integrity and corruption in education, such as the standards of professional competences of the management of general education, the standards for professional competences of teachers, the methodologies for school evaluation and the evaluation of managers and the regulation for the attestation of teachers.

The collection of qualitative data took place through two focus group discussions with storytelling activities (one with student teachers and one with managers). The first focus group was organised on 13th November 2019 with a group of 10 master's degree students in Educational Management at the State University of Moldova included teachers and managers with different pedagogical backgrounds. On 12th December 2019, a group of 13 principals participated in the focus group within the EC PRO DIDACTICA premises. Both groups had participants from both urban and rural areas, men and women, teachers, and managers.

The first focus group took place at the State University of Moldova with one group of master's degree students. It was composed of 10 people, 8 women and 2 men, 9 from urban and one from rural educational institutions, including one man from the training department of the Ministry of Interior. The average age was 35 years. The duration of the group was 2 hours.

The focus groups comprised of questions regarding the context of the educational process from the integrity perspective, from general questions regarding corruption to specific ones on improper practices in the process of hiring and promoting teachers.

In the second focus group, 13 managers participated, among whom were; a representative of the National Agency for Quality Assurance in Education and Research (NAQAER), responsible for evaluating and accrediting institutions and managers; an ex-director of the National School Inspectorate, 3 directors of educational institutions in the capital city, 4 of the rural institutions, 3 of the district centres, a representative of the regional Education Department and one special guest was a representative of the National Anticorruption Center. They represented all levels of educational institutions: kindergartens, primary schools, secondary schools, high schools, and colleges (VET), apart from universities. The average age was 46 years. The duration of the focus group was 4 hours.

The discussion started with the presentation of an article titled "Forms of corruption in the educational system from Moldova: a backstage view",[15] published on 30th October 2019 on the Platzforma webpage. The article mostly presents the integrity violations committed by teachers, as the violations committed by principals are not discussed in public space as much. Nevertheless, it provoked hot debates and contradictory opinions, many agreeing while others questioned the author's objectivity. Other questions during the focus group were focused on the malpractices regarding teacher recruitment and promotion, the perspectives and challenges to promote integrity in schools, the necessary policy reforms, and other necessary changes at the school level.

The next step was three in-depth interviews, one with the representative of the MoECR responsible for the evaluation and professional development of teachers; one with a former Minister of Education, whose agenda was fighting corruption in education; and one with a teacher, a national expert and trainer in language didactics who also had experience in presiding the national commission for the organisation of the baccalaureate national exam. They were selected based on their professional relationship with EC PRO DIDACTICA and partnership in the projects.

[15] http://www.platzforma.md/arhive/387774

The respondents were asked to describe in depth the practices of teacher employment and examples of illicit acts that they had encountered and how they happened (who is the victim, what are the factors that facilitate these acts and what are the measures to stop them). They were also asked about good practices regarding human resource management in education and to name other common cases of corruption in schools. In the conclusion, they were asked to share their opinions regarding the perspectives/challenges of promoting integrity in education and what should be done.

The respondents were not available for face-to-face interviews. They postponed it several times because it was during the period of the winter holidays. In the end, they responded to the questions in writing and sent them by email. To validate the answers and to add details, the final questions were discussed over the telephone."

Mongolia

"The data used in this assessment was collected through focus group discussions, individual interviews, social media analysis, and desk research. For the collection of evidence through the focus groups, we applied the INTES-based AIREN[16] approach. The purpose of different data collection technique was to understand the experiences connected to acts of corruption in education as conveyed by those involved: teachers, parents, civil society, and authorities.

Three focus group discussions were organised with dynamic storytelling techniques to explore the practices of parental contributions in various schools. At first, the piggyback focus group was conducted inviting members of the Parent-Teacher Association after their annual event in the capital city. The group was composed of 23 parents from six rural schools from four aimags. For them, the dynamic storytelling method was used to explore the context. A survey by the Asia Foundation served as the basis for the stories to be used in the storytelling. Four unfinished stories about a child to be admitted to a school, to be transferred to a different class or school, and about a child attending day care with their own teacher were given to the groups to write happy endings. The group included school and kindergarten teachers and was therefore faced with some limitations (…) Key topics discussed were parental contributions, the illicit access to prestigious public schools, the undue recognition of student achievement and the ways to prevent these illegal practices.

The second focus group was in Uvurkhangai province, involving five participants including three herders, one NGO representative and a retired school staff member. A letter with attached instructions was sent to a non-governmental organisation, the most active in Uvurkhangai province that had collaborated with MEA on the WB funded project of the Social Accountability and Community School asking to nominate participants for the FGD. The other focus group discussion was conducted in Ulaanbaatar, the country's capital city. The city group included seven people, including representatives/parents from the private sector, international NGOs, national NGOs, the Mongolian National University, and former public employees.

Several individual interviews were organised with an officer of the Education Inspectorate in Uvurkhangai aimag and Ulaanbaatar city.

This phase was preceded by desk research, which was instrumental in the preparation of this report. Numerous documents that we collected for the desk research included laws such as the National Constitution, the Law on Education, the Law on Anti-corruption, the Law on Conflict of Interest Prevention, the Law on Civil Service; rules and regulations such as the Code of Ethics of school teachers and administrators, the School Rule, Public Servants Code of Ethics, the National Programme against corruption, third parties reports such as the Asia Foundation survey on the perceptions and knowledge of corruption (SPEAK), the IAAC survey and social media materials etc."

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16 Analysis of Integrity-Related Education Narratives.