

Is there corruption in public higher education institutions? Study of the HEIs of Minas Gerais

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Corruption in the Brazilian public administration has gained centrality due to the successive scandals unveiled in the country. The public higher education institutions (HEIs) did not go unscathed, bringing attention to the fact that they are organizations aimed at promoting citizenship and intellectual education. This article analyzed how the organizational environment is configured to fight corruption through a case study of the 17 HEIs in Minas Gerais. We verified characteristics related to corruption in administrative disciplinary proceedings established between 2015 and 2019 and interviewed civil servants who participated in the conduction of these processes. Although most interviewees did not have a clear perception of corruption in the HEIs, the research findings indicated the main factors related to integrity that contribute to fighting corruption in the organizational environment. These factors are the complaints channels, external and internal control mechanisms, instruments for promoting ethics and rules of conduct, transparency, and access to information. In terms of structure, it was found that corporatism was the main obstacle to fight corruption in the organizational environment. The study points out the need for future research to verify the institutionalization of integrity measures in the HEIs as a strategy to combat corruption.

Keywords: corruption; integrity; public HEIs; university; corporatism.

Corrupção na educação superior pública? Estudo das Ifes de Minas Gerais


A corrupção na administração pública brasileira vem adquirindo maior centralidade graças aos sucessivos escândalos desvendados no país. As instituições públicas federais de ensino superior (Ifes) não passaram incólumes por esse contexto, chamando a atenção por se tratar de organizações voltadas à promoção da formação intelectual e cidadã. Este artigo analisa de que forma o ambiente organizacional se configura para o combate à corrupção por meio de um estudo de caso nas 17 Ifes de Minas Gerais. Para isso, verificam-se as características relacionadas com a corrupção em processos disciplinares administrativos (PADs), instaurados de 2015 a 2019, e entrevistam-se servidores que participavam da condução desses processos. Apesar de a maioria dos entrevistados não ter uma percepção clara do fenômeno da corrupção nas Ifes, os achados da pesquisa indicam que os principais fatores do ambiente organizacional referentes à integridade que contribuem para o combate à corrupção correspondem aos canais para manifestação de denúncia, aos mecanismos de controle externo e interno, aos instrumentos de promoção da ética e às regras de conduta, transparência e acesso à informação. Em termos de estrutura, constata-se que o corporativismo é o principal empecilho do ambiente organizacional no combate à corrupção. Para isso, sugere-se o desenvolvimento de pesquisas futuras voltadas a verificar a institucionalização das medidas da integridade nas Ifes como estratégia de combate à corrupção.

Palavras-chave: corrupção; integridade; ifes; universidade; corporativismo.

DOI: <http://dx.doi.org/10.1590/0034-761220210100>

Article submitted on March 15, 2021 and accepted on October 04, 2021.

[Translated version] Note: All quotes in English translated by this article's translator.

ISSN: 1982-3134 

¿Corrupción en la educación superior pública? Estudio de las Ifes de Minas Gerais

La corrupción en la administración pública brasileña ha ido adquiriendo mayor centralidad debido a los sucesivos escándalos develados en el país. Las instituciones públicas federales de educación superior (Ifes) no permanecieron indemnes a este contexto, llamando la atención por tratarse de organizaciones orientadas a promover la educación intelectual y ciudadana. Este artículo analizó cómo se configura el entorno organizacional para combatir la corrupción a través de un estudio de caso en las 17 Ifes de Minas Gerais. Para ello, se verificaron las características relacionadas con la corrupción en los procesos administrativos disciplinarios (PAD) instaurados de 2015 a 2019 y se entrevistó a los funcionarios que participaron en la conducción de estos procesos. A pesar de que la mayoría de los entrevistados no tuviera una percepción clara del fenómeno de la corrupción en las Ifes, los hallazgos de la investigación indicaron que los principales factores del entorno organizacional relacionados con la integridad que contribuyen a la lucha contra la corrupción corresponden a los canales para la manifestación de denuncias, mecanismos de control externo e interno, instrumentos de promoción de la ética y reglas de conducta, transparencia y acceso a la información. En términos de estructura, se encontró que el corporativismo era el principal obstáculo del entorno organizacional en la lucha contra la corrupción. Se sugiere desarrollar investigaciones futuras orientadas a verificar la institucionalización de las medidas de integridad en las Ifes como estrategia de combate a la corrupción.

Palabras clave: corrupción; integridad; Ifes; universidad; corporativismo.

ACKNOWLEDGEMENTS

The authors would like to thank CAPES, CNPq, and FAPEMIG for their support in this research.

1. INTRODUCTION

Corruption in public administration has been highlighted in recent years in Brazil. It has acquired greater centrality thanks to successive scandals unveiled in the country (Pinho & Sacramento, 2018; Sadek, 2019). Corruption is not a new concept in Brazilian life (Romeiro, 2015; Schwarcz, 2008). Its multifaceted and complex nature is well-known (Fortini & Sherman, 2018; Rose-Ackerman & Palifka, 2016) and recent investigations have shown a high-level media impact that culminated in the condemnation of several Brazilian politicians and businesspeople, such as the *Mensalão* Scandal (Sadek, 2019) and the Operation Car Wash (Bechara & Goldsmith, 2020; Gonçalves & Andrade, 2019; Marcelino & Oliveira, 2021), producing political and cultural consequences (Mendonça & Figueiredo, 2019; Odilla, 2020).

The dynamics of corruption have involved accusations related to higher education, referring to circumstances such as fraud to secure admission or obtaining diplomas, privileges, ethically ambiguous behavior in research development, plagiarism. These situations are usually overshadowed by the relevant social and moral role of higher education institutions (Faria, 2015; Osipian, 2008). Some cases in Brazil are examples of these dynamics, such as the irregularities detected in 2018 in contracts of the University of Brasília (UnB) with companies selected without the appropriate public procurement process (Fraga & Motta, 2013); the investigation for misappropriation of research grants at the Federal University of Paraná (UFPR) in 2013 (Leher, 2019); and the investigation of complaints at the Federal University of Santa Catarina (UFSC) that culminated in the Dean's tragic suicide in 2017 (Oliveira, 2019).

The prevention and fight against corruption involve a variety of measures such as the consolidation of legislation (Godinho, 2011; Oliveira & Neves, 2014), the increase in social control and transparency (Bataglia & Farranha, 2020; Rose-Ackerman & Palifka, 2016), the reduction of inequalities (Machado &

Paschoal, 2016; Pinto, 2011), and the consolidation of the integrity system (Fortini & Shermam, 2017; Independent Commission Against Corruption [ICAC], 2018; Viol, 2021). However, according to the Organisation for Economic Cooperation and Development (OCDE, 2020, p. 5, our translation), public integrity is one of the strategic and sustainable responses to corruption because “traditional approaches based on creating more rules, stricter compliance, and stricter enforcement have limited effectiveness”.

Since 2010, several regulations applied to the Brazilian public service have been enacted. These also covered federal public higher education institutions (HEIs), with rules to curb corruption and promote corporate and public integrity. Examples of regulation are Decree 7,203 (Decreto nº 7.203, de 04 de junho de 2010), which prohibits the practice of nepotism; the Freedom of Information Law (LAI) (Lei nº 12.527, de 18 de novembro de 2011) and Decree 7,724 (Decreto nº 7.724, de 16 de maio de 2012), which provides for access to information; the Conflict of Interest Law (Lei nº 12.813, de 16 de maio de 2013); and the Governance Decree (Decreto nº 9.203, de 22 de novembro de 2017).

Against this backdrop, this article aims to analyze how the organizational environment is configured in the fight against corruption in public HEIs. These institutions are linked to the structure of the Brazilian Ministry of Education (MEC), are responsible for the transmission and generation of knowledge (teaching and research), and the transfer (extension) of benefits to society through the lenses of integrity. The HEIs studied depend on the federal budget transfer to cover personnel costs and capital expenses (Lei nº 9.394, de 20 de dezembro de 1996). Thus, budgetary and financial management autonomy is subject to the guidelines and criteria of the political and economic powers. However, public higher education is seen in Brazil as a cost, not an investment, with constant restrictions and budget cuts (Caetano & Campos, 2019).

Thus, despite the difficulties caused by the dispersion of power (Vieira & Vieira, 2004); by the weaknesses of university administrators (Tosta, Dalmau, Tosta & Tecchio, 2012); by the obstacles to managing administrative, subordinate, and personal relationships (Santos & Bronnemann, 2013); by the reduction of autonomy and budget (Caetano & Campos, 2019); and due to the overload of tasks of civil servants (Pires & Oliveira, 2020), the HEIs must also adapt to the legal requirements and norms of the regulatory entities (Santos & Bronnemann, 2013).

Civil servants at HEIs are governed by the Code of Professional Ethics for Civil Servants of the federal executive branch, which provides for the moral and ethical principles to be observed. From 2003 to 2020, 1,599 civil servants linked to the Ministry of Education were dismissed based on sanctions applied by agencies and entities of the federal executive branch – mostly workers allocated in HEIs. From these civil servants, 23.83% were dismissed for involvement in corruption, demonstrating an increase in the number of dismissals for this reason in the period (from 85 in 2010 to 171 in 2019) (Controladoria-Geral da União [CGU], 2020). Thus, this study analyzed the administrative disciplinary proceedings (ADPs) instituted from 2015 to 2019 in public HEIs of the Brazilian state of Minas Gerais and interviewed employees who conducted these proceedings.

From a theoretical point of view, how the phenomenon of corruption materializes in higher education in the country is little explored in the national literature. Thus, there is little research disseminating this type of information to the academic community and helping to understand, prevent, and fight corruption (Barreto, Midlej & Gomes, 2019; Marani, Brito, Souza & Brito, 2018). In social terms, the damage caused by corruption is not limited to the institution directly impacted. It is not

only economic damage but also negatively affects the political and social sphere (Ang, 2020; OECD, 2020; Sadek, 2019). Furthermore, from a practical point of view, the results of this study contribute to the instrumentalization of prevention and fight against corruption strategies within the scope of the HEIs. It takes into consideration an analysis carried out by the Federal Court of Accounts (Tribunal de Contas da União [TCU], 2018) on the exposure to the risk of occurrence of fraud and corruption cases. The analysis showed that of the 17 HEIs examined, only 1 had low exposure to the risk of fraud and corruption.

This article is divided into five sections, including this Introduction. The second section presents a literature review on the phenomenon of corruption, linking it to integrity. The third section lists the data and methods used to explore the research procedures. The fourth analyzes the content of the ADPs and how the interviewees recognize the dimension of the phenomenon of corruption in the studied HEIs. The fifth section presents the final considerations.

2. THEORETICAL FRAMEWORK ON CORRUPTION AND INTEGRITY

Since the country's colonization, corruption has been present in Brazilian society, manifesting in many patterns throughout history and according to the country's economic and democratic development (Balbe, 2006; Filgueiras, 2008; Romeiro, 2015; Schwarcz, 2008). Different strategies have been adopted to address this problem, such as the modernization of the state since the period so-called "*Era Vargas*" (1930-1945) (Bresser-Pereira, 2006; Filgueiras & Aranha, 2011), the enactment of the most recent Federal Constitution in 1988 (considered the country's major regulatory framework for combating corruption), and the creation and strengthening of control institutions (Filgueiras & Aranha, 2011; Machado & Paschoal, 2016; Viol, 2021).

Pinho and Sacramento (2018, p. 205, our translation) are emphatic in stating that "corruption in Brazil has accelerated in recent decades, despite the implementation of institutions and laws to combat the phenomenon; we do not see, at least in the medium term, a concrete possibility of breaking this vicious circle." Thus, despite the changes in Brazilian public administration over time, corruption is still a recurring ailment.

Another challenge is the very definition of corruption, given the complexity and multidimensionality of the topic. The definition evolves as society changes what is considered corruption (Brei, 1996; Filgueiras, 2008; Miranda, 2018).

Transparency International (2020) adopts a brief and comprehensive definition: "the abuse of entrusted power for private gain." Rose-Ackerman (2005), in turn, adds "political gains." In the view of Barreto, Midlej, and Gomes (2019, p. 2, our translation), corruption is a phenomenon that refers to the "use of public office for private gain, in which a public agent is responsible for performing a task using bad-faith for private enrichment." However, Sadek (2019, p. 1278, our translation) warns that perceptions about corruption "must be analyzed with due care, since they are not confused with reality nor result from analyzes based on scientific rigor," indicating a multifaceted concept.

Although there is no consensus on the definition of corruption, there are different interpretations of corrupt practices (Marcelino & Oliveira, 2021). Rose-Ackerman (2005) reinforces that bribery, fraud, embezzlement, and conflicts of interest are considered illegal in most countries, but it is not unanimous. For Rothstein (2018, p. 37), corruption manifests in many forms, "from outright demands

for high bribes in exchange for health care to more subtle exchanges of personal favors regarding the recruitment or promotion of civil servants”. The classic models, for example, focus on bribery (Ang, 2020).

For Miranda (2018, p. 256, our translation), there is only corruption when there are exchanges, “illegal payment (financial or not) for obtaining, speeding up, or for the absence of a service performed by an employee public or private.” From the author’s perspective, there is “petty corruption” (carried out by street-level bureaucrats, such as petty bribery and robbery); “large-scale corruption” (related to the preferences of political elites and affects the effectiveness of policies); and “legislative corruption” (related to how legislatures are influenced by an interest group).

Thus, just as there are different perspectives on what corruption is, there are also different approaches on how to combat this problem, with integrity being one of the strategic and sustainable responses. According to Transparency International (2000), integrity comprises a system of checks and balances to promote accountability, transparency, prevention, and penalty within the government units. In turn, Castro, Amaral, and Guerreiro (2019, p. 190, our translation) emphasize the relationship between integrity and corruption, defining integrity as a “set of internal mechanisms and procedures for the effective application of guidelines that detect and mitigate deviations, frauds, irregularities, and illegal acts committed against the public administration,” reinforcing integrity as a strategy to prevent and fight corruption.

In the 2000s, the debate on integrity increased substantially, thanks to pressure from multilateral organizations such as the United Nations (UN), the World Bank, and the OECD (Vieira & Barreto, 2019). These agencies began to consider integrity essential for political and economic progress and promoted initiatives and conventions, rules, monitoring guidelines, and sanctions (Huberts & Graaf, 2014; Machado & Paschoal, 2016) to address corruption. For Cochrane (2020), the demand on the public sector to meet the highest standards of integrity has increased significantly due to evidence of declining public trust in government institutions.

Laws and regulations aimed at curbing corruption and promoting corporate and public integrity in Brazil sought to improve the country’s regulatory apparatus over time, with a new emphasis from the 2000s onwards. Vieira and Barreto (2019) pointed out that, with the approval of the Anti-Corruption Law (Lei nº 12.846, de 01 de agosto de 2013), there was an interest in integrity programs – expanded after the Governance Decree (Decreto nº 9.203, de 22 de novembro de 2017), which made it mandatory for bodies and entities of the direct, autarchic, and foundational administration to institute integrity programs. The Office of the Comptroller General (CGU) was responsible for implementing the integrity measures (Viol, 2021).

These actions consist of establishing an integrity unit and preparing and approving an integrity plan encompassing the following institutional measures: promotion of ethics and rules of conduct for civil servants, promotion of active transparency and access to information, handling of conflicts of interests and nepotism, whistleblowing, verification of the functioning of internal controls and compliance with audit recommendations, and the implementation of accountability procedures. The CGU would be responsible for monitoring the institutions’ compliance with the provisions of CGU Ordinance 57 (Portaria CGU nº 57, de 04 de janeiro de 2019). In general terms, the framework proposed by the CGU seeks to outline a possible institutionalization of governance parameters aimed at integrity.

In short, integrity is a combination of strategies based primarily on the prevention and promotion of ethics and rules of conduct focused on correctness to mitigate and combat irregularities, unlawful acts, and corrupt practices – a portrait of the corruption phenomenon (Cochrane, 2020).

Therefore, the concept of corruption is multifaceted. The analysis presented in this article adopts the definition of “corruption” as a set of practices that overlay private and public interests to obtain illegal (pecuniary and/or political) advantages for oneself or others, through exchanges between actors or by adopting deviant behavior.

3. METHODOLOGY

This is a qualitative (Denzin & Lincoln, 2000) and descriptive (Collis & Hussey, 2005) research using a multiple case study (Yin, 2001). It seeks to analyze the factors of the organizational environment that contribute to fighting corruption in public HEIs.

Data was collected from different sources as recommended by Eisenhardt (1989): bibliographic consultations on the issues of corruption, integrity, and HEIs; document analysis; and field research through semi-structured interviews.

Document analysis was carried out following Silva, Emmendoerfer, and Cunha (2020), examining the content of administrative disciplinary proceedings (ADPs). ADPs can be considered as one of the visible channels demonstrating deviations that may occur in these institutions. These proceedings are mandatory to investigate the offense committed and establish a process to dismiss civil servants in Brazil (Gomes, 2014). The ADPs must be instituted upon discovering an irregularity in the public service to investigate functional infractions and apply penalties such as suspension for more than 30 days, dismissal, removal from an appointed position, cancellation of retirement, or cancellation of the state of availability (when civil servants must be available to work in different positions in case their function is discontinued) (Lei nº 8.112, de 11 de dezembro de 1990). The CGU indicates the classification of the processes based on the type of infraction under investigation.

Box 1 presents the 26 topics observed in the ADPs investigating irregularities committed by civil servants of the federal executive branch, according to the CGU’s Data Correction Panel. We selected eight of these 26 topics that could be related to corruption: improper accumulation of positions; non-compliance with exclusive dedication regime; irregular granting of benefits, licenses, or authorization; conflict of interest between the public function and acts of private life; disappearance or perishment of public assets; favoring oneself or third parties; irregularities or fraud in agreements; and irregularities or fraud in bids or contracts. This selection was made according to the semantic analysis of the subjects (Bardin, 2016) and, later, corroborated by the interviewees’ perception.

ADPs are classified for third-party access throughout their process but disclosed upon completion (Lei nº 12.527, de 18 de novembro de 2011). For this research, we analyzed 92 ADPs on the eight topics selected, established and completed from 2015 to 2019 for the 17 public HEIs of Minas Gerais.

The period analyzed was established after research carried out in September 2020 in the Data Correction Panel, which showed an increase in the number of dismissals of civil servants linked to the Ministry of Education (MEC) in 2015 (CGU, 2020). Thus, based on the assumption that the majority of employees of MEC are located in public HEIs and that such sanctions applied to federal employees are often related to corruption cases, this period was investigated to visualize the possible dynamics of this phenomenon.

BOX 1 TOPICS LEADING TO ADPS

Order	Topics
1	Improper accumulation of positions
2	Moral harassment
3	Sexual harassment
4	Lack of agility to execute tasks or to give information
5	Absent or late for work
6	Denounces (<i>Banco de Denuncias</i>) (subject to classification)
7	Irregular granting of benefits, licenses, or authorization
8	Conflict of interest between the public function and acts of private life
9	Disappearance or perishment of public assets
10	Non-compliance with the Freedom of Information Law (LAI)
11	Non-compliance with the norms related to public budget
12	Non-compliance with exclusive dedication regime
13	Designating attributions to personnel not related to the government unit
14	Disproportional relation between personal assets and income
15	Revealing classified information
16	Complaints received via the <i>e-OUV</i> (ombudsman) (subject to classification)
17	Procedural errors or non-compliance with rules or regulations
18	Lack of courtesy, improper conduct, lack of moderation in public, and exaggeration in expressions of like or dislike
19	Favoring oneself or third parties
20	Irregularities expressed in norms and regulations
21	Irregularities or fraud in agreements
22	Irregularities or fraud in bids or contracts
23	Irregularities captured via the control system <i>Monitor-Web</i> (subject to classification)
24	Nepotism
25	Debt recognition
26	Representation of private interest against the administration

Source: CGU (2020).

However, some public HEIs refused the request for access to the full content of the ADPs. Some of the reasons given were: not having the processes electronically, insufficient servers and equipment to digitize documents, difficulties in hiding confidential data. Thus, we decided to simplify and requested only part of the ADPs: the final report prepared by the commission, opinion of the legal attorney, and decision of the competent authority.

This study conducted semi-structured interviews with civil servants directly involved in conducting the ADPs, based on the idea that the person responsible for recording irregularities could visualize the dynamics of corruption. The interviews were conducted based on a non-probabilistic sample, intentionally selected according to the research interests (intentional sampling) (Thiry-Cherques, 2009).

Thus, between October and November 2020, the qualified interlocutor and 10 HEI employees were interviewed remotely. The first interview was conducted with a qualified interlocutor, selected because of their notorious knowledge – they held their position for more than five years – to verify if the interview script was adequate. From the seventh interview onwards, no new information was registered, indicating the adequacy of the criteria established (Salmons, 2014).

The confidentiality of the source was preserved, as recommended by Resolution 510 (Resolução nº 510, de 07 de abril de 2016), of the Brazilian National Health Council. In order to avoid identifying the participants' gender, the records were prepared as if all informants were male, attributing generic names, dissociated from the HEIs. The institutions were also randomly assigned a number (HEIs 1 to 17). This research does not aim to compare one institution with another but to analyze how the organizational environment configures itself in the fight against corruption in the HEIs.

Regarding data analysis, content analysis was carried out for the primary and secondary data, as described by Bardin (2016). Thus, three distinct steps were considered: pre-analysis, analytical description, and referential interpretation. The first consists of the organization itself and is summarized in Box 2. Of the 17 HEIs, only HEI 15 did not provide access to the data or respond to invitations for interviews.

After obtaining a corpus, the second stage (analytical description) was carried out by defining categories. The content analysis of the ADPs was based on two categories: corruption and integrity. In the “corruption” category, the irregularities that motivated the ADP were considered corruption when the Office of the General Comptroller (CGU) considered them as corruption cases. According to the CGU, corruption acts are those provided for in articles 43, items LXI and IX, of Law 4,878 (Lei nº 4.878, de 03 de dezembro de 1965); and in articles 117, items IX, XII, XII, and XVI, of Law 8,112 (Lei nº 8.112, de 11 de dezembro de 1990), and 132, items IV, X, and XI of the referred law. Because Law 4,878 (Lei nº 4.878, de 03 de dezembro de 1965) refers to the specific legal regime of police officers, which was not the object of this study, the content of the items referring to Law 8,112 (Lei nº 8.112, de 11 de dezembro de 1990) was considered.

BOX 2 CHARACTERISTICS OF THE DATA ANALYZED

Institution	Analyzed ADPs	Position of the interviewee	Years of employment	Years in the current position	Duration of interviews (minutes)
Qualified interlocutor	-	Professor	47	7	45
HEI 1	Not available	Administrative technician	32	6	65
HEI 2	2	Did not reply when invited			
HEI 3	8	Administrative technician	9	2	40
HEI 4	1	Professor	4	8 months	65
HEI 5	3	Administrative technician	8	4	43
HEI 6	1	Administrative technician	10	8	65
HEI 7	5	Professor	18	3	80
HEI 8	0	Administrative technician	7	3	75
HEI 9	8	Did not reply when invited			
HEI 10	5	Did not reply when invited			
HEI 11	3	Administrative technician	3	3	90
HEI 12	3	Administrative technician	Not informed	5	70
HEI 13	Not available	Administrative technician	27	17	105
HEI 14	7	Prefer not to participate in the interview			
HEI 15	Not available	Did not reply when invited			
HEI 16	1	Did not reply when invited			
HEI 17	2	Did not reply when invited			

Source: Elaborated by the authors.

In the “integrity” category, to analyze the factors of the organizational environment that contribute to fighting corruption in public HEIs, some of the institutional integrity measures described by CGU Ordinance 57 (Portaria CGU nº 57, de 04 de janeiro de 2019) were verified and used to detect the irregularity investigated in the ADP.

The content analysis of the interviews was based on three categories: corruption, integrity, and structure. In the category “corruption,” the existence of corruption was considered according to the interviewees’ perceptions. In the category “integrity,” we analyzed the institutional integrity measures described by CGU Ordinance 57 (Portaria CGU nº 57, de 04 de janeiro de 2019) to fight corruption

and the most used channels for detecting irregularities. For the category “structure,” the difficulties in preventing and fighting corruption were examined.

The third phase of the research consisted of treating the results to make them meaningful and valid. Inferences and interpretations were carried out considering the combination of the results and the theoretical framework (Bardin, 2016), seeking to identify the factors of the organizational environment that are configured to fight corruption in public HEIs.

4. PRESENTATION AND ANALYSIS OF RESULTS

During the document pre-analysis, we found 49 ADPs within the scope of the research out of the 72 ADPs available. Therefore, the study focused on these 49 ADPs. Regarding the interviews, the results refer to the perceptions of eleven participants (ten interviewees and the qualified interlocutor). It is worth noting that some results were presented in the form of frequency to illustrate and compare the data obtained, without any intention of providing statistical analysis.

Concerning the category “corruption,” of the 49 ADPs analyzed, only six contained corruption practices (according to the CGU’s understanding of corruption, as explained in the methodology) subjected to the penalty of dismissal. Four resulted in dismissal as provided for in item IV, art. 132, of Law 8,112 (Lei nº 8.112, de 11 de dezembro de 1990), which deals with administrative improbity. Another dismissal occurred due to the provision of item X of that article: damage to public treasury and dilapidation of national assets. Finally, another dismissal was classified as both administrative improbity (item IV) and corruption (item XI).

The field research showed that eight of the eleven interviewees considered that there is corruption in the HEIs, although half understand that the cases are rare (participants 4, 5, 7, and 8). However, if the cases investigated in the ADPs and reported by the interviewees were analyzed considering the definition of corruption adopted in this article (a set of practices that overlay private and public interests to obtain illegal (pecuniary and/or political) advantages for oneself or others, through exchanges between actors or by adopting deviant behavior, it would be possible to observe more events than those registered. For example, the qualified interlocutor mentioned that there are many cases of non-compliance with the exclusive dedication regime. However, the interlocutor does not consider the practice an act of corruption. This interpretation is corroborated by the document analysis since, of the eight ADPs analyzed from HEI 3, two were related to non-compliance with the exclusive dedication regime, and, in both cases, the infraction was proven but not considered corruption.

When entering an employment contract of exclusive dedication, the civil servant is aware that they receive an additional salary to ensure they will not engage in any other paid activity, except those permitted by law. Thus, by breaching this regime, there is illicit enrichment, which, according to the concept adopted in this article, would be a corrupt act, as there is an overlap of private and public interests to obtain illegal advantages for themselves.

This finding reinforces the challenge reported by Brei (1996) and Miranda (2018) regarding the lack of consensus on the definition of corruption. Furthermore, given that the field results are based on interviewees’ perceptions, it is to be expected that there will be differences in the interpretation of this phenomenon (Sadek, 2019).

The results of the category “integrity” are summarized in Table 1. All the questions asked in this category and in the category “structure” allowed multiple answers, so the percentages were calculated using a sample of 11 interviews.

TABLE 1 RESULTS OF THE CATEGORY “INTEGRITY”

Category	Analytical category	Indicators	ADPs	ADPs (%)	Interviews	Interviews (%)
Integrity	Instruments to detect irregularities	Internal denounce	18	37%	11	100%
		External control	11	22%	7	64%
		Internal audit	1	2%	6	55%
		Internal control	9	18%	4	36%
		External denounce	6	12%	3	27%
		Office of internal affairs	-	-	1	9%
		Others	4	8%	2	18%
	Institutional integrity measures	Internal control	-	-	2	18%
		Internal audit	-	-	10	91%
		Denounces	-	-	11	100%
		Promotion of ethics	-	-	11	100%
		Transparency	-	-	11	100%

Source: Research data.

Concerning the instruments for detecting irregularities verified in the ADPs, the most used were internal reporting channels (37%), followed by external (22%) and internal (18%) control mechanisms. These data are in line with the interviewees’ perception, who considered complaints made through internal channels (100%), external control mechanisms (64%), and internal audit (55%) the most used channels to detect misconduct. They revealed that the HEIs do not have a specific administrative unit for internal control and that, in general, control procedures are carried out by the internal audit or other sectors of the institution. This finding corroborates the analysis by Fortini and Shermam (2017) that several entities of the Brazilian public administration do not have a unit responsible for internal control and, those that do, occupy a lower position in the organizational structure.

Studies carried out in Australia, New Zealand, and by ACFE (the world’s largest anti-fraud organization) also identified reporting/denounces as the primary form of detecting corrupt conduct (ICAC, 2018; Sardenberg & Ayres, 2019). However, although public servants are required to file a complaint when they become aware of the irregularity resulting from their work, the ICAC survey (2018) found that 34% of those who witnessed misconduct or irregularities in the workplace did

not denounce for fear of retaliation. It should be noted that the fear of making complaints was also expressed by 8 of the interviewees.

Thus, it is evident that implementing and disseminating measures to protect the whistleblower and encourage complaints can contribute to curbing corrupt actions. As one of the ways to protect the whistleblower, ICAC (2018) recommends that institutions disclose the guarantee of confidentiality and the possibility of making an anonymous complaint.

All interviewees reported the existence of an Ethics Committee in the HEIs where they work. However, some HEIs have been more active, training employees on ethics (interviewees 6 and 9); the dissemination of booklets on duties, rights, and prohibitions of public servants (interviewees 7 and 9); and training new employees on the organization's rules of conduct and norms (interviewees 4 and 6). The findings corroborate Bonfim and Silva (2019), who empirically demonstrated that promoting ethics and rules of conduct contributes to reducing dishonest actions. Therefore, even if establishing a relationship between an active behavior regarding the operation of the Ethics Committee and the absence of corruption is reckless based on the research findings, it is possible to infer that actions aimed at encouraging the ethical conduct of public servants can contribute to the prevention of corrupt attitudes.

Regarding transparency, all interviewees reported that the HEIs have policies aimed at promoting this measure. However, only two mentioned campaigns to increase awareness and encourage sectors to make information available. Thus, it is inferred that most interviewees associate transparency with offering information on institutional Internet websites and responding to citizens' requests through electronic channels (*e-Sic*). This finding emerges from perceptions as manifested by interviewee 2, who revealed that the HEI presents a "deficient active transparency and a perfect passive transparency."

During the document analysis of the ADPs, weaknesses were found in the access to information systems, considering that 18% of the HEIs failed to comply with the deadlines established by LAI, and 47% rejected the request for information. Although, after filing the appeals, 82% of the HEIs granted access to the processes. The resistance to providing this information corroborates Cunha and Antunes (2021) and Mohallen et al. (2018). It appears that, despite the advances achieved in recent decades, with the creation of freedom of information laws and mechanisms aimed at promoting public transparency, HEIs must work to be more effective regarding access to information.

Regarding the category "structure," the main challenge to prevent and fight corruption, according to the interviewees, is corporatism. They reported strong resistance from civil servants to participate in proceedings committees due to the fear of judging their peers. These findings are corroborated by Odilla (2020), who demonstrated that such fear originates in self-protective behavior. Interviewees mentioned that some members of the proceedings committees procrastinate the conclusion of processes, contributing to surpassing the prescriptive period to apply penalties. Document analysis examining the ADPs reinforces these findings, revealing cases where the prescriptive period was surpassed and sanctions waived.

Another problem reported by interviewees and consistent with document analysis is the committees' unpreparedness, resulting in the nullity of the processes. This finding corroborates the study by Vieira (2012), which revealed that many investigation processes or ADPs are nullified by the lack of training and specialization of professionals on proceedings commissions. This situation reinforces the difficulties of public servants to investigate their peers, whether due to limitations in judging colleagues or the lack of structure, resources, and training.

5. FINAL CONSIDERATIONS

After corruption allegations reported by the media in recent years involving HEIs, which are organizations that promote citizenship and intellectual education, this research aimed to analyze all 17 public HEIs in the Brazilian state of Minas Gerais to find out how the organizational environment is configured in the fight against corruption through the lenses of integrity. We analyzed 49 administrative disciplinary proceedings (ADPs) established in these institutions from 2015 to 2019 and carried out eleven interviews with HEI civil servants directly involved in conducting the ADPs.

The main research findings suggest that the low occurrence of corruption cases in the HEIs does not seem to be intrinsically linked to the efficiency of the anti-corruption mechanisms. This conclusion is based on the coincident reports of the interviewees about the difficulties to prevent and combat this corruption, such as the reactive response from the ombudsman and the integrity and ethics committees, absence of correctional units, lack of measures to deal with conflicts of interest, employee fear over filing complaints, accumulation of tasks, among others. Furthermore, only three of the eight institutional measures analyzed (handling complaints, promoting ethics, and transparency and access to information), although with reservations, were mentioned by all interviewees as measures used to control corruption in the HEIs. These findings corroborate TCU (2018), which indicated that 94% of the HEIs in Minas Gerais are exposed to the risk of fraud and corruption due to weaknesses in controls.

This study suggests that understanding the concept of corruption influences the perception and analysis of the phenomenon. When the majority of interviewees report there are no cases of corruption in the HEIs or that there are sporadic cases, this may be due to their perception comparing the situation with more serious cases (such as corporate scandals with high media impact), considering that all cases analyzed in this research can be classified as “petty corruption” (Miranda, 2018). However, although all types of corruption must be combated, the impacts of systemic corruption (“large-scale corruption”) in the institutional, political, and economic scenarios for the country are of unprecedented magnitude (Bechara & Goldschmidt, 2020). In addition, there are limitations regarding the implementation of institutional measures of integrity, which may be linked to the contingency and cuts in HEIs resources. The issue of budget cuts and lack of resources has an important role in the debate addressed in this article.

As for the limitations of the structure needed to fight corruption, it appears from the study that corporatism is the main bottleneck in dealing with this phenomenon. A well-structured internal affairs department is suggested to overcome this limitation, responsible for instructing and assisting in proceedings commissions through technical support and demanding compliance with deadlines. This measure may reduce the annulment of processes and penalties by training members from different sectors, preventing civil servants from the same organizational unit from investigating peers.

Future studies could verify the institutionalization of integrity measures in HEIs as a strategy to fight corruption. Finally, this research confirmed the relevance of studying a phenomenon present in the Brazilian scenario since the country’s colonization, and that is still responsible for serious damage to society and public education.

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