

TEMPLATE 4: ACTION PLAN

<p>Case number:</p> <p>Name Organisation under review: University of Belgrade</p> <p>Organisation's contact details: 11000 Belgrade (Republic of Serbia), Studentski trg 1, Phone: +381113207401; Fax: +381113207481; kabinet@rect.bg.ac.rs</p>

SUBMISSION DATE: JULY 13, 2018

1. ORGANISATIONAL INFORMATION

Please provide a limited number of key figures for your organisation. Figures marked * are compulsory.

STAFF & STUDENTS	FTE
Total researchers = staff, fellowship holders, bursary holders, PhD. students either full-time or part-time involved in research	4735
Of whom are international (i.e. foreign nationality)	184
Of whom are externally funded (i.e. for whom the organisation is host organisation)	N/A ¹
Of whom are women	2292
Of whom are stage R3 or R4 = Researchers with a large degree of autonomy, typically holding the status of Principal Investigator or Professor.	2547
Of whom are stage R2 = in most organisations corresponding with postdoctoral level	N/A ²
Of whom are stage R1 = in most organisations corresponding with doctoral level	2188
Total number of students (if relevant)	99760
Total number of staff (including management, administrative, teaching and research staff)	8671
RESEARCH FUNDING (figures for most recent fiscal year)	€
Total annual organisational budget	170,787,000

¹ Integrated financial and funding information of the faculties and institutes within the University of Belgrade is not available. The University of Belgrade has decentralized funding, which means that the faculties and institutes, being separate legal entities, remain direct beneficiaries of government funding, as well as of research grants. In addition, the University of Belgrade (Rectorate, as its central administrative unit) does not have legal tools to exert financial control (including collecting the relevant data) over its members (faculties and institutes). For the mentioned reasons, no overall funding data analysis is possible.

² Many of researchers from the University of Belgrade carry out research within post-doctoral programs abroad, but the formal position (job) dedicated to post-doctoral research in institutions located at the territory of the Republic of Serbia is not recognized neither by the Law on Higher Education, nor by the Law on Scientific Research. For example, although the former strongly encourages all types of scientific training and continual education (Art. 58 Par. 2), the latter explicitly guarantees certain labor-based rights only to researchers who pursue their postdoctoral research *abroad* (Art 95). For all these reasons, no statistical measurement of the required data is possible.

Annual organisational direct government funding (designated for research)	N/A ¹
Annual competitive government-sourced funding (designated for research, obtained in competition with other organisations – including EU funding)	N/A ¹
Annual funding from private, non-government sources, designated for research	N/A ¹
ORGANISATIONAL PROFILE (a very brief description of your organisation, max. 100 words)	
<p>The University of Belgrade is the oldest university in Serbia and the largest in Southeastern Europe. Founded in 1808, it consists of 31 schools, 11 research institutes, 13 centers, Computer Center and the University Library. It provides education in Sciences and Mathematics, Technology and Engineering Sciences, Medical Sciences, Social Sciences and Humanities. Being one of the largest universities in the wider region, and top-ranked at global lists, the University of Belgrade has highly developed international cooperation.</p>	

2. STRENGTHS AND WEAKNESSES OF THE CURRENT PRACTICE:

Please provide an overview of the organisation in terms of the current strengths and weaknesses of the current practice under the four thematic headings of the Charter and Code at your organization.

Thematic heading of the Charter and Code	STRENGTHS and WEAKNESSES
Ethical and professional aspects	<p>The level of research freedom is high and it is safeguarded by the Statute of University, Code of Ethics within the framework provided by the Law on Higher Education and the Law on Scientific Research. Professional attitude of the researchers is imposed by the contractual obligations of the institutions towards the project funders, and awareness on those obligations is relatively high. The University adopted Regulation on determining the types of non-academic behaviour concerning written works (2016), with subsequent amendments, and the Regulation on the doctoral studies (2016). Still, there is an unsatisfying level of awareness among members of academic community (including PhD students) of the existing ethical rules at the University and the level of its implementation. The dissemination and exploitation of the research results has reached satisfying level. The UB has established an innovative system for permanent archiving, indexing and use of digital objects, named PHAIDRA (Permanent Hosting, Archiving and Indexing of Digital Resources and Assets). PHAIDRA contains deposited PhD and master thesis, final exams and other published papers, and keeps them protected, in accordance with copyright legislation. However, there is a lack of strategic research framework at the university level, aligned with national and international policies and frameworks.</p>

<p>Recruitment and selection</p>	<p>The University has adopted a sufficiently transparent legal framework for recruitment of researchers (Regulation on minimal conditions for obtaining the title of lecturer at the University of Belgrade with amendments, 2016). Criteria for employment and/or career advance are considered as transparent and clear by the researchers. Career breaks are typically not considered as an obstacle. There is a significant number of English-language doctoral and master programmes. In accordance with the legal framework of the Republic of Serbia, ever since 2014, the competent Ministry (ENIC/NARIC centre) is responsible for recognition of foreign higher education degrees for professional purpose.</p> <p>Still, we found an insufficient level of execution of existing legal framework in the field of researchers' recruitment. Advertisements for job positions are still not sufficiently at international level. There is also a lack of multidisciplinary approach to selection criteria, and informative feedback after the completion of the selection process is insufficient. Besides formal requirements (primarily bibliometric indices), less quantifiable criteria are not always taken into consideration in order to assess overall potential of applicants.</p>
<p>Working conditions</p>	<p>Social security, health and pension contributions are paid by the university to the full extent. Work hours are flexible, sabbatical leave is possible under good conditions. Recognition of mobility of (outgoing) PhD students is regulated. There is a Centre for career development at the university, as well as the Centre for Lifelong Learning, and, as a result of the extension of the initial action plan implementation they now cover also young researchers. Most of the teaching staff (sometimes from the level of assistant professor and above) participates (with voting rights) in the work of professional boards of the faculties. Participation in mentioned activities is typically mandatory, and all teaching staff can be nominated as the members of professional boards.</p> <p>Still, research positions often suffer from the lack of guarantees for permanent employment, due to the diminished level of security of public financing of project activities. There exists no system for monitoring trends in career paths of female and male researchers. Not researchers from all stages of their career are represented in decision-making bodies of University (at least not in a satisfactory way). Professional status of PhD students is not fully recognized. Research infrastructure (equipment and facilities) is not well developed, due to a lack of funds. In general, researchers are overloaded with the teaching engagement. Salaries are considered as low.</p>

Training and development	<p>Ministry for education, science and technological development is regularly awarding travel grants for the scientific events and bilateral projects. In both cases, the participation of PhD students is esteemed. The University Rulebook on PhD studies, adopted in 2016, provides for various rules of supervisor's conduct during several phases of the studies. The formal conditions given by the Rulebook include mandatory participation in permanent education programmes.</p> <p>Although training, workshops and similar tools are generally available, there is a need to make them planned and well-structured. There is no standardized process of monitoring or evaluating of the supervision and mentoring processes.</p>
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3. ACTIONS

The Action Plan and HRS4R strategy must be published on an easily accessible location of the organisation's website.

Please provide the web link to the organisation's HR Strategy dedicated webpage(s):

*URL: <http://bg.ac.rs/sr/nauka/primena-strategije.php>,

Please fill in a sum up list of all individual actions to be undertaken in your organisation's HRS4R to address the weaknesses or strengths identified in the Gap-Analysis:

Proposed ACTIONS	GAP Principle(s)	Timing (at least by year's quarter/semester)	Responsible Unit	Indicator(s) / Target(s)
<p>Widening publicity scope of formally existing relevant legal acts of the University. Adressing the problem of unsatisfying level of awareness among members of academic community (including PhD students) of the existing ethical rules at the University and the level of its implementation</p>	<p>Ethical principles</p>	<p>1s/2y</p>	<p>Board for Professional Ethics</p>	<p>Ethical principles and importance of their respect are properly accentuated and publicized by the means of: - publishing the Code of Ethics, and the Rulebook of the faculties' ethical committees (Serbian and English version) and of the University Ethical Committee at a more exposed location at the University website; - promoting ethical</p>

				principles contained in the relevant legal acts of the University by regularly informing the teaching staff and researchers; - organizing courses on academic integrity for students and lecturers
Providing precise rules on mandatory use of anti-plagiarism software	Professional responsibility	1s/1y	Senate of the University	Adoption of a procedure at the University level for full eradication of plagiarism; organising trainings for researches and teaching staff, aiming at appropriate use of the anti-plagiarism software (at least twice per semester)
Introducing precise mechanisms for education and training of the EU funded project members on financial administration of projects	Professional attitude	1s/1y	International Cooperation Office	Promotion of the EU funded projects; Organizing courses in the field of project management aimed at continual education of all stage researchers (R1-R4) (five times a year)
Providing specific rules about manipulation and transparency of research data in the relevant legal framework	Accountability	1s/2y	Rector	Forming the Working Group with the task of implementation of Open Science principles; adoption of Platform for Open Science at the University of Belgrade
Introduction of the strategic approach to deeper understanding of research goals and its relevance at the wider public level	Public engagement	2s/1y	Office for Studies and Research	Organizing several promotion days for stressing the importance of fundamental values of integrity of research (p. e. at scholarships fairs) Organizing events aimed at establishing wider communication of research goals to relevant public and private stakeholders (government, commerce, industry)
Providing for more	Recruitment	2s/2y	Senate of the	Introducing

<p>consistent implementation of the University legal framework in the field of researchers' recruitment</p>		2s/3y	<p>University</p>	<p>amendments to the Strategy of Internationalization, in order to enhance the using available tools for international recruitment</p> <p>Translating the OTM-R regulations provided on the website of the University of Belgrade (that are currently only available in Serbian) into English</p>
<p>Enabling better visibility of job advertisements at the international level</p>	<p>Recruitment (Code)</p>	2s/1y	<p>Information Centre</p>	<p>Translate and publish the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade</p>
<p>Ensuring multidisciplinary approach to selection criteria</p>	<p>Selection (Code)</p>	2s/3y	<p>Office for Studies and Research; Senate of the University</p>	<p>Organizing events for promotion and adequate valorisation of the multidisciplinary/interdisciplinary/trans-disciplinary approach, and subsequently amending the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade</p>
<p>Making informative feedback after the finalization of the selection process mandatory</p>	<p>Transparency (Code)</p>	2s/3y	<p>Senate of the University</p>	<p>Amending the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade, in order to introduce a formal and fully informative feedback in the process of selection</p>
<p>Defining criteria, apart from bibliometric measures, which will</p>	<p>Judging merit (Code)</p>	2s/3y	<p>Senate of the University</p>	<p>Amending the Rulebook on the manner and procedure</p>

forefront additional useful skills				of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade, in order to introduce additional recruitment requirements (such as useful skills)
Including indicators such as career breaks or variations in the chronological order of CVs in the relevant rulebook	Variations in the chronological order of CVs (Code)	2s/3y	Senate of the University	Amending the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade
Making mobility experience formally recognized and valued	Recognition of mobility experience (Code)	2s/3y	International Cooperation Office; Senate of the University	Organizing panel-discussions aimed at promotion and exchange of the mobility experience, and subsequently amending the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade
Ensuring formal professional recognition of all types of research and teaching activities within the University	Recognition of the profession	2s/3y	Senate of the University	Adoption of the Employment Policy, which will contain framework for formally recognizing all types of professional engagement, including non-academic types of employment (business sector, public administration, government)
Ensuring a more appropriate balance between teaching and research activities	Research environment	2s/3y	Senate of the University	Adoption of the Employment Policy, in which the time ratio research and teaching duties will be recommended, in order to be fully implemented in corresponding legal framework (bylaws, contracts, etc) where

				appropriate
Providing tools for monitoring trends in career paths of female and male researchers	Working conditions	2s/3y	Senate of the University	Adoption of the Gender Equality Policy, which will ensure monitoring system on research career development; Adoption of annual reports with conclusions on trends in career paths
Organizing programme- and project-targeted trainings for researchers as a measure for broadening private, non-national, and other external sources of funding	Stability and permanence of employment	2s/2y	Centre for Technology Transfer; Senate of the University	Creation of strategy for establishing meeting points with representatives of private (non-public) sector, in order to facilitate professional mobility between the academic staff and the private sector; Organizing trainings for researchers (at least twice a year) with the purpose of better inter-connecting of the academia and business sector
Creating additional normative framework which stimulates stronger cooperation between academia and industry	Funding and salaries	2s/2y	Senate of the University	Adoption of rulebook on cooperation of the University of Belgrade and industry (private sector), in accordance with previously defined strategic approach (see the column above)
Ensuring a fairer representation of female researchers at higher levels of research and academic careers	Gender balance	2s/3y	Senate of the University	Adoption of the Gender Equality Policy, which will provide for bylaws aiming to ensure gender-sensitive policies of electing top management
Ensuring a more supportive approach to career development of the researchers	Career development	2s/3y	Secretary-General; Information Centre	Introducing more dynamic communication (meetings, consultations etc.) between HR offices of faculties and institutes, and that of the University of Belgrade, in order to provide adequate support for

				<p>researchers' career development; Organizing frequent consultations between (at least twice a year);</p> <p>Establishing web-service (at the website of the University of Belgrade) with frequently asked questions on main issues of the career development of researchers</p>
Enhancing inter-sectoral mobility between industry (business) and academia	Value of mobility	2s/3y	Senate of the University	Adoption of the Employment Policy, which will contain framework for formally recognizing all types of professional engagement, including non-academic types of employment (business sector)
Establishing well-founded practice in the field of access of researchers to career advice	Access to career advice	2s/2y	Senate of the University	Establishing (at the level University of Belgrade) procedures for mentoring system at the faculties and institutes
Preventing misbalance between teaching and research activities	Teaching	2s/3y	Senate of the University	Adoption of the Employment Policy, in which the time ratio research and teaching duties will be recommended, in order to be fully implemented in corresponding legal framework (bylaws, contracts) where appropriate
Correcting disparities in researchers' representatives between different member units of the University	Participation in decision-making bodies	1s/2y	Rector	Organizing a panel-discussion between representatives of the University of Belgrade, its member units, and the government, with the aim of identifying and suggesting adequate measures for reforms of existing legislative framework (which currently

				presents an obstacle in this field) ³
Providing additional tools for scrutiny of supervisors' role in conducting PhD students' duties	Relation with supervisors	2s/2y	Senate of the University	Introduction of amendments to the Rulebook on PhD studies, by which formal mechanisms to better scrutinize supervisors' role in conducting PhD studies' obligations will be introduced
Creating constructive and positive relationship between senior and early-stage researchers in research projects management within the national framework	Supervision and managerial duties	2s/2y	Computer Centre	Creation and maintaining of a database, at the University of Belgrade level, in which information on the structure of projects' members' duties and responsibilities is measurable and (more) transparent
Ensuring a well-structured plan for attending workshops and similar types of professional development tools	Continuing Professional Development	2s/3y	Senate of the University	Establishing (at the level University of Belgrade) procedures for planning researchers' professional development activities
Communicating training opportunities, workshops, and similar tools for researchers' career development at a wider scale	Access to research training and continuous development	2s/2y	Rector	Adoption of recommendation of the management of the University of Belgrade, in which valorisation of attending all types professional development tools will be contained
Providing inclusion of the feedback mechanisms for assessment of proper implementation of the Rulebook on PhD studies regarding supervisors' role	Supervision	2s/2y	Senate of the University	Introduction of amendments to the Rulebook on PhD studies, by which full enforcement of application and scrutiny of supervisors' role will be ensured

³ This is the reference to the contradictions between texts of certain norms of the Law on Higher Education on one hand, and the Law on Scientific Research on the other.

The establishment of an Open Recruitment Policy is a key element in the HRS4R strategy. Please also indicate how your organisation will use the Open, Transparent and Merit-Based Recruitment Toolkit and how you intend to implement/are implementing the principles of Open, Transparent and Merit-Based Recruitment.

Please fill in a sum up list of all individual actions to be undertaken in your organisation's HRS4R, based on the weaknesses identified in the OTM-R:

Proposed ACTIONS	OTM-R Principle(s)	Timing (at least by year's quarter/semester)	Responsible Unit	Indicator(s) / Target(s)
Organization and implementation of OTM-R workshops for R2 and R3 researchers	<i>Is everyone involved in the process sufficiently trained in the area of OTM-R?</i>	2s/3y	Office for Studies and Research; Centre for Career Development	2-4 workshops organized
Adoption and distribution of a recommendation letter to the faculties and institutes to make job announcements available in English language as well	<i>Does our current OTM-R policy encourage external candidates to apply?</i>	1s/2y	Rector	Recommendation letters sent
Organization, coordination and implementation of Serbian language courses for foreigners (PhD students and other researchers); Translation and publishing the English language version of OTM-R policy relevant legal acts	<i>Is our current OTM-R policy in line with policies to attract researchers from abroad?</i>	2s/1y	Vice-Rector for International Cooperation	Serbian language lectures are well defined, organized, and implemented. The University Rulebook is officially translated into English and published (the University website OTM-R page is updated)
Adding further specific non-discrimination measures (related to career advance and employment) for recruitment of researchers belonging to underrepresented groups, to the relevant University bylaws (the Employment Policy and the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the	<i>Is our current OTM-R policy in line with policies to attract underrepresented groups?</i>	2s/2y	Senate of the University	The Employment Policy and the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade are updated

employment status at the University of Belgrade)				
Improving the content of job advertisements, in order for them to include: starting date of the employment; researcher career profiles (R1-R4); working conditions, workplace, entitlements; professional development opportunities; career development prospects; the application procedure and deadline, which as a general rule, lasts for at least two months from the publication date (the current deadline, provided in the Rulebook, is 15 days); a reference to the institution's OTM-R policy; a reference to the institution's equal opportunities policy; contact details	<i>Do we include in the job advertisement references/links to all the elements foreseen in the relevant section of the toolkit? [see Chapter 4.4.1 a) of the OTM-R expert report</i>	2s/2y	Legal and HR Office	Content of job advertisements is improved
Facilitating publishing of job advertisements on EURAXESS portal	<i>Do we make full use of EURAXESS to ensure our research vacancies reach a wider audience?</i>	2s/1y	Centre for Career Development	Training of the University administrative staff in EURAXESS jobs advertisements publishing is well organized and implemented
Establishing an exclusive transmission of supporting documents by electronic means by adoption of the Employment Policy and amending of the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade	<i>Do we keep the administrative burden to a minimum for the candidate? [see Chapter 4.4.1 b)</i>	2s/3y	Senate of the University	The Employment Policy and the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade are updated

Introducing the necessary legal requirement for the University, its faculties and institutes to inform the candidates on the strengths and weaknesses of their applications	<i>Do we provide adequate feedback to interviewees?</i>	2s/3y	Senate of the University	The Employment Policy and the Rulebook on the manner and procedure of obtaining the title of lecturer and on establishing the employment status at the University of Belgrade are updated
Establishing a system for the OTM-R deliveries' assessment by introducing a special work group whose task would be to make necessary assessments in the field of the implementation of OTM-R objectives	<i>Do we have a system in place to assess whether OTM-R delivers on its objectives?</i>		Rector	Special work group is established, well organized, and competent for regular assessment of implementation of OTM-R objectives

If your organisation already has a recruitment strategy which implements the principles of Open, Transparent and Merit-Based Recruitment, please provide the web link where this strategy can be found on your organisation's website:

URL: <http://bg.ac.rs/en/university/OTM-R.php>

4. IMPLEMENTATION

General overview of the expected implementation process:

Implementation of the action plan will be carried out by the responsible management, research and administrative staff at the level of the University, as well as at the level of its members, *i.e.*, faculties, and institutes. It will be coordinated most directly by the *Steering group for the implementation of HRS4R process of the University of Belgrade*, constituted by the rector's decision adopted on September 27, 2017. The chairman of the Steering Group is the Vice Rector for Science, Innovation, and the Technology Transfer, and the vice-chairman is the Secretary-General of the University. Other members were selected in order for all of the researchers' categories (R1 to R4) to be represented. **In addition, for the purposes of taking care of the implementation and communication of HRS4R process within the University, a special Implementation Committee is established by the decision of the Rector (February 14, 2019).**

In compliance with the Draft of the Human Resources Strategy for Researchers, and under the scrutiny of the Steering Group **and Implementation Committee**, wider involvement of the faculties' and institutes' management in the process is going to be facilitated, by maintaining

regular consultations with responsible personnel of the members of the University at least **four times** a year. Objectives of these consultations are: to inform the faculties and institutes about the progress in implementation of the Strategy, to put the best effort to get support of the members' management, and to resolve any operational (including legal, technical, etc.) obstacles, **as well as to ensure timely and successful implementation of the Strategy. One of the key elements of the implementation process will be the Employment Policy of the University of Belgrade.**

Through professional skills development program and OTM-R workshops, the process has for its aim to enable the engagement of all the researchers in various stages of scientific career (all of the researchers' categories (R1 to R4)). In order to increase the awareness of the principles of Charter and Code and their implementation, the workshops having for subject explaining the significance of OTM-R are to be organized on a regular basis.

Make sure you also cover all the aspects highlighted in the checklist below, which you will need to describe in detail:

Checklist	*Detailed description and duly justification
How will the implementation committee and/or steering group regularly oversee progress?	<p>The Steering Group will hold meetings at least six times a year. The main issue will be focused on developing the content of the future Employment Policy of the University of Belgrade, in full compliance of the Charter and Code principles, and by following guidelines provided by the conclusions outlined in the Gap Analysis. In addition, management and responsible administrative staff of the University will be consulted by the Steering Group regularly, and the Group will submit reports on its activities to the rector of the University.</p> <p>Due to its more operative character, the Implementation Committee is intended to hold meetings more frequently than the Steering Group (once a month). The Committee's main task is monitoring of the process of implementation of the Strategy (HRS4R).</p>
How do you intend to involve the research community, your main stakeholders, in the implementation process?	In accordance with recommendations given to them by the Steering Group and the Implementation Committee , responsible personnel of the members of the University (vice-deans of faculties and directors of institutes) will inform the lecturers' and researchers' staff, within

	<p>the scope of their competence, about the occurring processes in the field of drafting of the HRS4R, and, further in the perspective, in the field of its implementation. <i>Via</i> the same or similar channel of communication, the research community of the faculties and institutes will be strongly encouraged to take participation in the process, to give comments and suggestions, and to have an appropriate insight in the direction of drafting and implementation of HRS4R.</p>
<p>How do you proceed with the alignment of organisational policies with the HRS4R? Make sure the HRS4R is recognized in the organisation's research strategy, as the overarching HR policy.</p>	<p>The Employment Policy, Gender Equality Policy, and other relevant acts, as well as aforementioned actions, will be strongly correlated to HRS4R, sharing its main aims, recommendations, and further projections of improvement of HR potential.</p>
<p>How will you ensure that the proposed actions are implemented?</p>	<p>In its personal composition, the Implementation Committee contains, among other members, representatives of the top management of the University of Belgrade (one being its chairman). Besides, in addition to the fact that the Implementation Committee has been formed by the decision of the rector of the University of Belgrade, it is also responsible to him in fulfilment of its duties. Since rector of the University of Belgrade is <i>ex officio</i> president of the Senate (which is composed of deans of faculties and directors and institutes), activities connected to HRS4R will be closely inspected by the main decision-making of the University of Belgrade.</p>
<p>How will you monitor progress (timeline)?</p>	<p>The Steering Group and the Implementation Committee will be submitting reports on their activities to the rector after each one of the meetings they hold. In addition, they will submit annual reports on implementation progress to the Council of the University of Belgrade, in order for it to be included in the overall annual report on the activities of the University of Belgrade.</p>
<p>How will you measure progress (indicators) in view of the next assessment?</p>	<p>The Steering Group and the Implementation Committee will closely follow whether the full number of issues recognized in the Gap Analysis is addressed properly. This, being the main</p>

	parameter for assessment of the process' adequate implementation, will be done in partial sequences; i.e. on each of the Group's and Committee's meetings, as well as – in a more documented way – within their annual reports to the Council of the University of Belgrade
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Additional remarks/comments about the proposed implementation process:

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