e-ISSN: 2636 – 9109
Volume 7 Number 2 September 2025, 01 ~ 07
DOI: https://doi.org/10.37698/knsj3j60


# Study of Integration MS ISO 9001:2015 with MS ISO 37001:2016 at Higher Education Institutions

**Nur Athirah Syuhada Binti Hasni[1*], Nordiana Binti Ahmad[1], Norsanariah Binti Zainol Abidin[1],**
[1]Faculty of Technology, Design and Management, UCYP University, 26600 Pahang, Malaysia.

**ARTICLE INFO**

***Article history:***

Received Sept 28, 2025
Revised Nov 20, 2025
Accepted Jan 22, 2026

***Keywords:***

Integrated Management System,
ABMS,
QMS

***Conflict of Interest:***

None

***Funding:***

None

**ABSTRACT**

This study examines the integration of Management System (MS) ISO 9001:2015, which focuses on Quality Management Systems (QMS), with MS ISO 37001:2016, which addresses Anti-Bribery Management Systems (ABMS), within the institutional framework of higher education institution. Employing doctrinal research, the study involves an in-depth analysis of the texts and requirements of both ISO standards to identify areas of convergence, compatibility, and potential integration. The research systematically reviews and interprets the relevant clauses, principles, and documentation structures to evaluate how the standards can be harmonized to support organizational quality and ethical governance. The findings reveal that despite their different objectives, both standards share several foundational elements such as leadership, risk-based thinking, internal audit, and continual improvement, which enable integration opportunities. This study offers opportunities and strategies for the integration of ISO 9001:2015 and ISO 37001:2016 documents, providing strategic guidance for higher learning institution to enhance operational efficiency while promoting a culture of integrity and anti-bribery compliance.

***Corresponding Author:*** Nur Athirah Syuhada binti Hasni, Faculty of Technology, Design and Management, UCYP University, 26060 Kuantan Pahang, Malaysia. Tel.: +60-17-4877699. E-mail: athirahsyuhada2225@gmail.com



## 1. Introduction

In recent years, higher education institutions in Malaysia have increasingly embraced international management standards to strengthen governance, quality assurance, and institutional credibility. In higher education institutions, the documentation and operational controls for management systems MS ISO 9001:2015 and MS ISO 37001:2016 are maintained separately, resulting in duplicated procedures, parallel audit schedules, and fragmented risk management practices. This separation increases administrative workload, consumes additional resources, and may lead to inconsistencies in policy implementation. While integration offers clear benefits, there is limited research and practical guidance on integrating these two standards specifically in the Malaysian higher education context. Without a structured integration framework, higher education institution either risks either non-compliance due to overlooked requirements or inefficiency due to redundant systems. To avoid this, a thorough study needs to be done to study the feasibility of integration.

To ensure good governance in business world, a lot of organizations choose to practice multiple management systems including ISO 9001 Quality Management System (QMS) and ISO 37001 Anti Bribery Management System. Organization which practices QMS will gain several benefits like constant improvement of process and product quality, customer satisfaction regarding effectiveness, increased product confidence, and cost savings through increased process efficiency. Anti-Bribery Management Systems Standard (ISO 37001) is developed for the purpose of assisting organizations to prevent, detect and address bribe towards better ethical business culture Each management system works in particular area and offers benefits in that area. Rybski et al. assert that it is possible to combine all separate management systems into a single management system

(Rybski et al., 2017). Some significant advantages of the integrated systems include increased corporate efficiency, unified audit, and optimal resource utilization.

While each standard serves a distinct purpose, both share common structural elements, as they are aligned with the Annex SL high-level structure. This commonality presents an opportunity for document integration, potentially reducing administrative burden, improving efficiency, and enhancing compliance monitoring. This study, therefore, seeks to analyze the extent to which the documentation and processes of MS ISO 9001:2015 and MS ISO 37001:2016 can be effectively integrated at higher education institutions. The goal is to develop a practical integration model that maintains compliance with both standards while improving efficiency, consistency, and overall governance.

## 2. Literature Review

### *2.1 ISO 9001:2015 Quality Management System*

Since its initial publication in 1987, the ISO 9001 International Standard has grown to become a significant aspect of the quality movement and a crucial management framework for all kinds of enterprises across the globe (Fonseca, 2015). ISO 9001 certification plays a significant role in international business and is a highly visible proxy for the adoption and intensity of quality management systems (QMSs), even if it is not required. With reduced focus on paperwork and new/reinforced approaches, ISO 9001:2015, which was released on September 15, 2015, will significantly assist QMSs and ensure that ISO 9001 represents the needs of modern enterprises (Fonseca, 2015).

In the higher education sector, ISO 9001 provides a structured pathway for standardizing academic and administrative processes, optimizing service delivery, and aligning institutional operations with stakeholder expectations. Increasingly, Higher Education Institutions (HEIs) are adopting ISO 9001 as part of a broader movement toward structured quality assurance systems that are both internationally recognized and adaptable to diverse educational contexts.

The ISO 9001: 2005 standard encourages a strong quality management system (QMS) based on seven fundamental principles: customer focus, leadership, engagement of people, process approach, evidence-based decision-making, relationship management, and continuous improvement. These principles align with the institution's vision of attaining excellence in educational service delivery and stakeholder satisfaction (International Organization for Standardization [ISO], 2021; SIRIM QAS, 2023).

The integration of ISO 9001 within higher education institutions (HEIs) reflects a growing international trend toward structured quality management systems aimed at enhancing institutional performance, satisfying stakeholder requirements, and aligning with global standards.

ISO 9001 encourages reliable and standardized processes throughout academic and administrative sectors, which directly contributes to enhanced institutional performance. Recent studies highlight that universities with ISO certification experience significant gains in process efficiency, especially when supported by strong leadership and ongoing training for staff (Iqbal, 2024). Gamit et al. (2024) endorse that in public universities, ISO 9001 facilitates systematic process monitoring, performance reporting, and responsiveness to external audits, all of which are essential for institutional growth and accreditation readiness.

A focus on stakeholders is a fundamental aspect of ISO 9001, and in higher education institutions (HEIs), this includes ensuring student satisfaction, engaging employees, and enhancing service quality. Rodríguez-Mantilla et al. (2024) note that the application of an ISO-based Quality Management System (QMS) increases an institution's responsiveness and influences internal organizational structures through improved communication, inclusivity, and services that cater to users' needs. (Iqbal et al., 2024) further emphasize the connection between staff development aligned with ISO standards and greater job satisfaction, which subsequently leads to better academic and operational results.

The ISO 9001:2015 standard, designed under the Annex SL, promotes the integration of quality management with other governance frameworks. When incorporated with an anti-bribery system like ISO 37001, ISO 9001 fosters ethical transparency, accountability, and mitigates risks within academic governance. These integrative approaches support institutions in meeting both internal performance objectives and external compliance requirements.

ISO 9001 has been shown to positively influence both administrative and academic aspects of operations. Studies by (Gamit et al., 2024)and the Index Copernicus (2021) illustrate that ISO adoption in HEIs leads to improvements in internal audits, document management, responsiveness to quality evaluations, and overall management efficiency. Moreover, these systems improve the quality of curriculum review processes and evaluations of student outcomes, supporting data-driven academic decision-making.

Nevertheless, implementing ISO 9001 in HEIs is not without challenges. (Maqbool, 2023) identifies financial constraints, inadequate training, and resistance to change as major hurdles in both public and private institutions. In response, some HEIs have devised hybrid quality frameworks that combine ISO 9001 with national accreditation frameworks or education-specific standards like ISO 21001, which helps to reconcile quality assurance with academic freedom (Ramese et al., 2024).

Recent research consistently affirms the role of ISO 9001 in advancing quality assurance across higher education. When implemented with contextual sensitivity, continuous staff development, and ethical governance, ISO 9001 promotes both operational effectiveness and academic excellence. However, to mitigate the risks of strict compliance and bureaucratic processes, institutions should pursue a flexible, adaptive strategy that aligns ISO 9001 with broader educational goals and local quality assurance requirements.

### *2.2 ISO 37001 Anti Bribery Management System*

MS ISO 37001:2016 is an internationally recognized standard that provides organizations with a structured framework for establishing, implementing, maintaining, and continually improving an anti-bribery management system. It outlines practical measures to help prevent, detect, and respond to bribery, thereby strengthening ethical governance and fostering trust among stakeholders (ISO, 2016). ISO 37001:2016 is suitable for organization to increase the awareness towards operational activities that have potential of bribery (Laela & Isnaini, 2021). The standard follows the High-Level Structure (Annex SL), making it easier to integrate with other ISO management systems, such as ISO 9001:2015. This alignment supports a consistent approach to compliance, documentation, and performance monitoring across different systems.

In October 2016, ISO published the Anti-Bribery Management System standard (ISO 37001) to help businesses avoid, identify, and deal with bribery in order to foster a more moral corporate culture. It is intended to assist a company in creating, implementing, maintaining, and enhancing a program to prevent bribery. It can assist organizations in strengthening their current controls or putting in place an anti-bribery management system. It lowers the likelihood of bribery and can show stakeholders that globally accepted best practices for anti-bribery controls have been implemented(Ishak et al., 2017).

While ISO 37001: 2016 cannot ensure that bribery will not occur, it can offer methods and tools that can lower risks and assist companies in managing risks in the event that they do. According to ISO (2016) ISO 37001 can be applied in all sectors including private, public, and non-profit sectors for small, medium and large organization. ISO 37001 specifies organization's implementation of policies, procedure and controls that are proportionate to the bribery risks that the organizations face(Putri et al., 2022). Furthermore, investors and other stakeholders will be reassured by the implementation of ISO 37001: 2016 that the company has an efficient management system in place to control bribery risk. The structure of ISO 37001 is comparable to that of other management system standards like ISO 9001 and ISO 14001(Hanindita et al., 2021).

Implementing an anti-bribery management system based on ISO 37001 in a university setting can significantly enhance governance and maintain integrity across its operations. ISO 37001 provides a systematic framework for preventing bribery through various strategic measures, including risk assessment, due diligence, and training(Hanindita et al., 2021). In the context of universities, which often engage with diverse stakeholders including government agencies, industry partners, and academic communities, adherence to robust anti-bribery protocols promotes transparency, reinforces organizational reputation, and aligns with global standards of ethical conduct.

## 3. Method

This study adopts a qualitative research design that combines doctrinal analysis and desk study to produce a theoretically accurate and practically applicable integration framework for MS ISO 9001:2015 and MS ISO 37001:2016 at higher education institutions.

Desk studies primarily serve to collate secondary data, allowing researchers to synthesize previous findings and draw contextual conclusions about a specific subject area. Legal doctrinal research plays a pivotal role in understanding and interpreting legal frameworks. This methodology encompasses the 'study, description, explanation, and analysis' of prevailing legal norms and values that often present conflicting principles within current legal systems. The primary goal of doctrinal research is to provide normative insights into how laws should operate, thereby offering proposals for legal reform and enhancement(Majeed et al., 2023).

The doctrinal analysis method was employed to conduct a systematic examination of the authoritative texts of MS ISO 9001:2015 and MS ISO 37001:2016 as published by the Department of Standards Malaysia. Each clause and sub-clause were reviewed to determine its specific intent, mandatory requirements, and relationship to other clauses. This ensured that the integration framework would remain fully compliant with both standards and avoid the risk of misinterpretation.

The research process involves a systematic clause-by-clause analysis to identify similarities and differences in the requirements stipulated by both standards. Using the common structure provided by Annex SL, the study maps overlapping clauses, highlights complementary requirements, and pinpoints unique provisions that require separate attention.

Subsequently, the findings are used to develop a harmonized strategies that enables both standards to be implemented concurrently, ensuring that the organization can meet quality management and anti-bribery compliance in a unified and efficient manner. This method not only streamlines documentation and processes but also supports sustainable compliance and operational excellence.

## 4. Results and Discussion

One of the primary advantages of IMS is enhanced organizational efficiency. By integrating various management systems, organizations can eliminate redundancies and avoid duplicative efforts in documentation and compliance processes, leading to significant time and cost savings(Solin et al., 2023). For example, Khairil highlights that an integrated approach enhances operational workflows, particularly in sectors such as manufacturing and service industries, where coordination across different management systems is crucial for performance improvement(Solin et al., 2023). This is further supported by Irawanto's findings, which indicate that organizations integrating their quality and environmental management systems consistently report better operational efficiency and stakeholder satisfaction(Wirawan Irawanto, 2021).

Organizations can benefit from IMS development in a number of ways, including reduced costs and tasks, less bureaucratic issues and conflicts between systems, and simplified paperwork, manuals, procedures, and registrations. In addition to having a systemic strategy for risks, organizational, communication improvement, and organizational performance management, it also permits structured and systematized conformance to the current regulations and allows time and resources to be saved through its senior management(Bernardo, 2014).

Moreover, IMS fosters continuous improvement and innovation within organizations. The literature indicates that the integrated approach empowers organizations to be more agile in responding to changing regulatory and market demands. By aligning their management practices with strategic objectives, companies can better respond to stakeholder expectations and ensure compliance with varying regulations across environmental and safety domains(Solin et al., 2023). The importance of awareness and training among employees regarding their roles in an IMS is emphasized by Francisco, who asserts that a well-trained workforce is fundamental to achieving continuous improvement in management practices(Francisco et al., 2024).

Another significant benefit of adopting an IMS is the facilitation of risk management. Khairil notes that integrating different management systems helps organizations identify overlaps and gaps in their risk management strategies, leading to a more comprehensive approach to risk mitigation(Solin et al., 2023). In IMS, risks are more likely to be discovered and addressed when processes are examined from various perspectives. This holistic perspective is vital in industries where compliance with health, safety, and environmental regulations is stringent and complex, allowing for better preparation and responsiveness to potential risks(Solin et al., 2023). Furthermore, as organizations adopt sustainability as a core value, IMS assists in managing risks related to environmental impact and social responsibility, thus supporting the achievement of the United Nations Sustainable Development Goals (SDGs)(Solin et al., 2023).

The strategic alignment achievable through IMS provides additional long-term benefits. The integrated framework enables organizations to pursue their sustainability goals more effectively, balancing social, environmental, and economic considerations, as articulated in the triple bottom line concept (Solin et al., 2023). Such alignment transcends basic compliance, allowing organizations to leverage their integrated efforts to enhance brand reputation and improve relationships with stakeholders who prioritize sustainability, as noted by Irawanto in his examination of the pharmaceutical sector in Indonesia(Wirawan Irawanto, 2021).

Challenges in implementing IMS may arise from the complexities involved in harmonizing various management standards and practices. Effective implementation requires organizations to adopt best practices tailored to their unique contexts (Zutshi & Sohal, 2005). Furthermore, organizations must address inherent risks associated with the transition to an integrated system, including potential disruptions during the implementation phase (Häkkinen & Hilmola, 2007). Anticipating and managing these challenges will be crucial to leveraging the full potential of IMS and achieving long-term sustainability.

In summary, IMS represents a strategic evolution for organizations aiming to improve operational efficiency and responsiveness. The benefits of such systems—ranging from enhanced resource utilization to improved stakeholder engagement—are supported by substantial research. However, careful planning and execution are essential to overcoming the complexities and risks that accompany integrative approaches.

**Integration of ISO 9001:2015 and ISO 37001:2016**

Both ISO 9001:2015 and ISO 37001:2016 follow the Annex SL High-Level Structure, which ensures consistency and easier integration between ISO management system standards. The common HLS includes:

1. Scope
2. Normative References
3. Terms and Definitions
4. Context of the Organization
5. Leadership
6. Planning
7. Support
8. Operation
9. Performance Evaluation
10. Improvement

Annex SL is a framework developed by the International Organization for Standardization (ISO) that provides a unified

structure, core text, and common terminology for all ISO management system standards.

Annex SL is a novel management system framework that facilitates the development of new standards and simplifies the implementation of numerous standards inside a single business (Tančić, 2014). Integration of document may be done by analyzing clause by clause. Firstly, the features ISO 9001:2015 and ISO 37001:2016 will be analyzed. Next, the similarities and differences between both ISOs will be analyzed and summarized in table below.

Both standards are similar in certain aspects. Firstly, they implemented a cycle knows as Plan-Do-Check-Action or better known as PDCA. This reflects to continuous improvement of both standards. Secondly, both standards highlight the same structure which follows Annex SL High Level Structure. This will make it easier for the standards to be integrated. Thirdly, implementation of the standard can be applied to the whole organization in all levels. Fourthly, both standards are based on risk management. This act as preventive measures which shall be planned in details. Next, the success of both standards is depending on top management commitment and the involvement of all personnel within the organization. The leaders in the organization shall demonstrate commitment to ensure the organization establish, implement, maintain and review the policy to achieve its objectives. Lastly, both standards require documented information in its implementation. With the significant similarities, the integration will be easier.

The differences are analyzed by reviewing each clause in the standard as below:

| No. | High Level Structure, Annex SL | ISO 9001 : 2015 | ISO 37001 : 2016 | Differences |
|---|---|---|---|---|
| **1.** | Scope | Quality Management Systems | Anti Bribery Management System | Different objectives: QMS is about quality & customer satisfaction; ABMS is about ethical conduct & bribery prevention. |
| **2.** | Normative References | ISO 9000:2015, Quality Management Systems – Fundamentals and vocabulary | No normative reference | QMS depends on another ISO document; ABMS is self-contained. |
| **3.** | Terms and Definitions | Terms and definitions in ISO 9000:2015 | Some of important terms are being defined. Eg : bribery, organization, | QMS language is product/service-oriented; ABMS language is compliance & ethics-oriented. |

| | | | | |
|---|---|---|---|---|
| | | | interested party, requirement, management system, top management, governing body, anti-bribery compliance function, effectiveness, objective, risk, competence, documented information, process, performance, outsource, monitoring, measurement, audit, conformity, nonconformity, corrective action, continual improvement, personnel, business associate, public official, third party, conflict of interest, due diligence | |
| **4.** | Context of the Organization | Clause 4.1 emphasizes organization shall determine external and internal issues that are relevant to achieve quality management.<br><br>Clause 4.2 states that organization need to understand the needs and expectations of <u>interested parties</u>.<br><br>Clause 4.3 highlights that organization shall determine the scope of quality management system | Clause 4.1 emphasizes organization shall determine external and internal issues that are relevant to achieve anti bribery management including some factors listed in the provision.<br><br>Clause 4.2 states that organization need to understand the needs and expectations of <u>stakeholders</u>.<br><br>Clause 4.3 highlights that organization shall determine the | There is one extra requirement for ISO 37001:2015 stated in Item 4.5. The organization is required to undertake regular bribery risk assessment. The organization shall review regularly to ensure changes can be properly assessed. On top of that, the organization needs to keep the documented information that demonstrates the bribery assessment has been conducted. |

| | | | | |
|---|---|---|---|---|
| | | Clause 4.4 states that organization shall establish, implement, maintain and continually improve QMS and its processes. | scope of anti-bribery management system.<br><br>Clause 4.4 states that organization shall establish, implement, maintain and continually improve ABMS and its processes.<br><br>Clause 4.5 Emphasizes on Bribery Risk Assessment. | |
| **5.** | Leadership | Clause 5.1 stresses on leadership and commitment related to quality management system. This item focuses on customer satisfaction.<br><br>Clause 5.2 states that top management shall establish a quality policy, | Clause 5.1 stresses on leadership and commitment related to anti bribery management policy.<br><br>Clause 5.2 states that Top Management shall establish Anti-Bribery Policy. | The policy focus and responsibilities are different for both standards. In ISO 9001, top management must ensure that the QMS is effectively implemented and maintained. In ISO 37001, Top management must ensure an Anti-Bribery Compliance Function is established (e.g., a compliance officer or committee). They must actively support reporting mechanisms (whistleblowing), ensure no retaliation, and allocate resources for bribery risk management. |
| **6.** | Planning | Clause 6.1 highlights on actions to address risks & opportunities.<br><br>Clause 6.2 states that organization shall establish quality objective and plan to establish them.<br><br>Clause 6.3 stresses that organization shall carry on changes in a planned manner. | Clause 6.1 highlights on actions to address risks & opportunities.<br><br>Clause 6.2 states that organization shall establish anti bribery objective and plan to establish them. | ISO 9001:2015 emphasizes the importance of implementing changes in a planned and systematic manner to ensure the integrity of the quality management system is maintained throughout the change process. In contrast, ISO 37001:2018, which focuses on anti-bribery management systems, does not explicitly mandate the requirement for changes to be carried out in a planned way. However, this gap has been addressed in the forthcoming amendment in ISO 37001:2025, which now incorporates a similar planning requirement to align with the principles of ISO 9001:2015. As |

| | | | | |
|---|---|---|---|---|
| | | | | of July 2025, Many HEIs has not yet fully adopted or implemented ISO 37001:2025, but active discussions, internal reviews, and preliminary preparations are currently underway to ensure a smooth transition and compliance with the updated standard. |
| **7.** | Support | Clause 7.1 determines and provide resources for QMS.<br><br>Clause 7.2: Ensure competence of personnel.<br><br>Clause 7.3: Ensure awareness of quality policy, objectives, and implications of nonconformance.<br><br>Clause 7.4: Establish communication processes.<br><br>Clause 7.5: Control documented information. | Clause 7.1: Determine and provide resources for ABMS.<br><br>Clause 7.2: Ensure competence in anti-bribery matters.<br><br>Clause 7.3: Ensure awareness of anti-bribery policy, objectives, and implications of noncompliance.<br><br>Clause 7.4: Establish communication, including confidential reporting (whistleblowing) channels.<br><br>Clause 7.5: Control documented information | Both ISO 9001 and ISO 37001 share several significant similarities, as they both emphasize the need for adequate resources, competence, awareness, communication, and documented information to ensure the effectiveness of their respective management systems.<br>ISO 9001 is primarily concerned with supporting the organization in consistently delivering products and services that meet customer and regulatory requirements. It focuses on ensuring the availability of competent personnel, proper infrastructure, and necessary documentation to maintain quality standards.<br><br>On the other hand, ISO 37001 also addresses support elements but with a specific focus on promoting ethical conduct and legal compliance to prevent bribery. While it shares the general requirements for competence and awareness with ISO 9001, ISO 37001 introduces additional layers of support that are unique to anti-bribery management. This includes the need for personnel with legal or ethical expertise, heightened awareness of ethical risks, and mechanisms to facilitate whistleblowing without fear of retaliation. |
| **8.** | Operation | Clause 8.1: Plan and control operations for delivering | Clause 8.1: Plan and control operations with anti-bribery measures. | ISO 9001:2015 Clause 8 centers on operational processes required to consistently deliver quality products and services, including planning, design, |

| | | | | |
|---|---|---|---|---|
| | | products and services.<br><br>Clause 8.2: Determine customer requirements.<br><br>Clause 8.3–8.5: Design, development, production, and service provision.<br><br>Clause 8.6: Release of products/services.<br><br>Clause 8.7: Control of nonconforming outputs. | Clause 8.2: Implement anti-bribery controls in contractual relationships.<br><br>Clause 8.3–8.4: Conduct due diligence for projects, business associates, and transactions.<br><br>Clause 8.5: Apply financial and non-financial controls to prevent bribery.<br><br>Clause 8.6: Implement anti-bribery in procurement and project approvals. | production, and control of nonconformities. In contrast, ISO 37001:2016 Clause 8 is dedicated to operational controls for preventing, detecting, and responding to bribery risks. It includes requirements for bribery risk assessment, due diligence, financial and non-financial controls, and management of third-party relationships. While ISO 9001 emphasizes product and service quality, ISO 37001 prioritizes anti-bribery safeguards across all organizational activities. |
| **9.** | Performance Evaluation | Clause 9.1: Monitor, measure, analyze, and evaluate QMS performance.<br><br>Clause 9.2: Conduct internal audits.<br>Clause 9.3: Management review. | Clause 9.1: Monitor, measure, analyze, and evaluate ABMS performance.<br><br>Clause 9.2: Conduct internal audits of anti-bribery controls.<br><br>Clause 9.3: Management review with focus on ABMS effectiveness and compliance. | Clause 9 in ISO 9001:2015 and ISO 37001:2016 both deal with performance evaluation, but with different focuses. ISO 9001:2015 emphasizes monitoring and evaluating the quality management system to ensure customer satisfaction and continual improvement, including internal audits and management reviews of product and process performance. In contrast, ISO 37001:2016 centers on evaluating the effectiveness of anti-bribery measures through performance monitoring, internal audits of bribery-related controls, and management reviews that focus on bribery risks, incidents, and corrective actions. Both standards emphasize on monitoring and internal audit however ISO 9001 requires organization to monitor customer satisfaction and feedbacks. |
| **10.** | 11. Improvement | Clause 10.1: Identify | Clause 10.1: Identify opportunities for | Clause 10 of both ISO 9001:2015 and ISO 37001:2016 highlights a shared commitment |

| | | | | |
|---|---|---|---|---|
| | | opportunities for improvement.<br><br>Clause 10.2: Address nonconformities and take corrective action.<br><br>Clause 10.3: Continual improvement of QMS. | improvement in anti-bribery controls.<br><br>Clause 10.2: Address bribery incidents or noncompliance and take corrective action.<br><br>Clause 10.3: Continual improvement of ABMS. | to continual improvement as a key aspect of effective management systems. Both standards stress the importance of identifying nonconformities or noncompliance, analyzing their root causes, and implementing corrective actions that prevent recurrence. This ensures that organizations move beyond temporary fixes and address underlying issues that may hinder performance or ethical compliance.<br><br>By adopting this structured approach, organizations can maintain systems that are not only compliant but also adaptable and aligned with strategic objectives. Continual improvement under Clause 10 supports a culture of accountability and responsiveness, enabling management systems to evolve alongside internal developments and external challenges, such as regulatory changes or shifting stakeholder expectations. |

**Integration Opportunities for Higher Education Institutions**

| No. | Clause | ISO 9001:2015 | ISO 37001:2016 | Integration Opportunity for HEIs |
|---|---|---|---|---|
| **1.** | Context of the Organization | Identify quality-related internal/external issues, stakeholder needs, QMS scope, and processes. | Similar, but includes bribery-specific factors and Clause 4.5 on bribery risk assessment. | Merge into one **context analysis document** that covers quality and bribery risks, with a separate bribery risk section. |
| **2.** | Leadership | Commitment to QMS, promote customer focus, establish quality policy, assign roles. | Commitment to ABMS, establish anti-bribery policy, assign compliance function. | Create a **single leadership commitment statement** covering both customer satisfaction and integrity, with dual policies in one manual. |
| **3.** | Planning | Identify quality risks/opportunities, set measurable objectives, plan changes. | Identify bribery risks, set anti-bribery objectives, maintain controls during changes. | Use a **unified risk management framework** where bribery risk is part of the enterprise risk register alongside quality risks. |
| **4.** | Support | Provide resources, ensure competence, promote | Provide resources, ensure anti-bribery | Maintain **one support process** that integrates |

| | | | | |
|---|---|---|---|---|
| | | awareness of quality policy, control documentation. | competence, awareness of anti-bribery policy, whistleblowing channels. | quality & anti-bribery training, and centralises document control. |
| **5.** | Operation | Deliver products/services, determine requirements, control production, manage nonconforming outputs. | Apply due diligence in transactions, business associates, and procurement to prevent bribery. | Combine into a **joint operational procedure** that embeds bribery controls into quality workflows (e.g., procurement & vendor evaluation). |
| **6.** | Performance Evaluation | Monitor quality KPIs, conduct internal audits, hold management reviews. | Monitor bribery prevention effectiveness, conduct compliance audits, hold management reviews. | Conduct **integrated audits** covering both quality and anti-bribery compliance; hold combined management reviews. |
| **7.** | Improvement | Correct nonconformities, take corrective action, seek continual quality improvement. | Correct bribery-related nonconformities, improve anti-bribery controls. | Implement **one continual improvement process** that addresses both quality and anti-bribery issues under a single corrective action system. |

**Integration Strategies for Higher Education Institutions**

Based on the integration opportunity highlighted above, there are few strategies that may be applied by higher education institutions. Secure strong and visible support from top management to ensure that the integration of ISO 9001 and ISO 37001 is prioritized across all organizational levels. This commitment should be demonstrated through the allocation of adequate resources, active participation in key decision-making processes, and ongoing communication of the importance of both quality and anti-bribery compliance. Top management plays a critical role in fostering a culture of continuous improvement and collaboration. Their endorsement is vital for motivating employees and lower management layers to embrace integration initiatives. According to (Alhaqbani et al., 2016) middle management's performance is often compromised by a lack of commitment from top management, which can hinder improvement initiatives in an organization. Conversely, an engaged top management team can drive initiatives and facilitate the necessary communications between various management levels. This reinforces the need for leaders to act as role models, demonstrating a commitment to integrated processes by actively participating in training and development efforts.

Employee involvement is a critical component in the integration process. As indicated by Silva et al., resistance to change often emerges from personnel not feeling adequately prepared or engaged in the integration efforts. Hence, organizations need to invest in training and communication to facilitate a smoother transition and solidify the understanding of the benefits associated with an integrated management system. Furthermore, fostering a culture of collaboration and continuous improvement can enhance workforce engagement, thus aiding in the adoption of integrated systems.

The integration of internal audits for ISO 9001:2015 and ISO 37001:2016 represents a strategic approach to enhancing organizational efficiency and governance. By consolidating audit activities into a unified program, organizations can reduce duplication of efforts, minimize disruption to operations, and optimize resource allocation. A combined audit schedule allows for both quality and anti-bribery controls to be assessed simultaneously within the same departmental or process audits. This is further supported by the development of integrated audit checklists that incorporate the specific requirements of both standards, ensuring comprehensive coverage and alignment with organizational objectives. Cross-training of internal auditors is essential in this strategy, as it equips them with the knowledge and competence to assess both quality management practices and bribery risk controls effectively. The execution of integrated audits promotes a process-based approach, where both standards are evaluated holistically rather than in isolation. Audit findings are compiled into unified reports, enabling clear categorization of nonconformities and facilitating coordinated corrective actions. Furthermore, presenting these findings during joint management review meetings fosters strategic alignment between operational performance and ethical compliance. Overall, this integrated audit strategy not only strengthens internal controls but also reinforces a culture of quality and integrity across the organization.

**5. Conclusion**

This research illustrates that merging MS ISO 9001:2015 (Quality Management System) with MS ISO 37001:2016 (Anti-Bribery Management System) at higher education institutions is both practical and strategically beneficial. By utilizing the common Annex SL High-Level Structure, the recommended integration framework provides a feasible route to consolidate documentation, simplify procedures, and enhance governance, all while maintaining compliance with both standards. The results show that integration can considerably minimize redundancy, maximize resource efficiency, improve audit effectiveness, and support the university's commitment to quality and integrity.

By integrating anti-bribery measures within quality management procedures, HEIs can achieve operational excellence alongside ethical compliance, which in turn boosts stakeholder trust and institutional reputation. The study also highlights that effective integration necessitates strong commitment from top management, proactive involvement from employees, and organized cross-training to foster skills in both quality and anti-bribery areas. Nevertheless, the research has certain limitations. It primarily utilizes a qualitative method grounded in doctrinal analysis and desk research, lacking empirical evaluation of the proposed framework in actual operational environments. Moreover, the study's concentration on a single higher education institution restricts the applicability of the findings to other sectors or organizational settings.

Future investigations should consider pilot implementations, quantitative performance evaluations, and comparative analyses across various institutions to validate and enhance the integration model. In summary, this study aids in addressing the lack of practical guidance for integration ISO 9001 and ISO 37001 in the Malaysian higher education landscape, providing a well-structured approach that fosters efficiency, compliance, and sustainable governance.

**Acknowledgements**

Author gratefully acknowledges UCYP University for providing the necessary resources and facilities for this research. This study was not supported by any grants from funding bodies.

**References**

Alhaqbani, A., Reed, D. M., Savage, B. M., & Ries, J. (2016). The impact of middle management commitment on improvement initiatives in public organisations. *Business Process Management Journal*, *22*(5), 924–938. https://doi.org/10.1108/BPMJ-01-2016-0018

Laela, E., & Isnaini. (2021). *Kajian integrasi dokumen SNI ISO 9001 : 2015 dengan SNI ISO 37001: 2016 di Balai Besar Kerajinan dan Batik*.

Bernardo, M. (2014). Integration of management systems as an innovation: A proposal for a new model. *Journal of Cleaner Production*, *82*, 132–142. https://doi.org/10.1016/j.jclepro.2014.06.089

Fonseca, L. M. C. (2015). Relationship between ISO 9001 certification maturity and EFQM business excellence model results. *Quality Innovation Prosperity*, *19*(1), 85–102. https://doi.org/10.12776/QIP.V19I1.556

Francisco, F. E., Costa, A. C. F., Alexandre Costa Araújo Sampaio, P., Domingues, P., & de Oliveira, O. J. (2024). Implementation and improvement of Integrated Management Systems: recommendations for their adaptation to the ISO High-Level structure. *Cleaner Environmental Systems*, *15*. https://doi.org/10.1016/j.cesys.2024.100227

Gamit, A. M., Santos, A. R., Armas, K. L., & Villegas, M. N. (2024). Implementation of ISO 9001:2015 in State Universities and Colleges : A Quality Management, Organizational Performance, and Legal Framework. *Corporate Law and Governance Review*, *6*(4), 94–102. https://doi.org/10.22495/clgrv6i4p9

Hanindita, RR. D. S., Julaeha, L., & Soewito, Y. D. L. (2021). Strengthening Anti-Bribery Governance through Integration of GCG with SNI ISO 37001: 2016 ABMS. *Asia Pacific Fraud Journal*, *6*(1), 135. https://doi.org/10.21532/apfjournal.v6i1.200

Iqbal, S. (2024). ISO 9001 as a catalyst: linking staff training to university performance. *The TQM Journal*. https://doi.org/10.1108/TQM-06-2024-0216

Iqbal, S., Taib, C. A. Bin, & Razalli, Mohd. R. (2024). The effect of accreditation on higher education performance through quality culture mediation: the perceptions of administrative and quality managers. *The TQM Journal*, *36*(2), 572–592. https://doi.org/10.1108/TQM-11-2022-0322

Ishak, N. K., Haron, H., Ishak, I., & Saidin, S. Z. (2017, April 3). ISO 37001: Anti Bribery Management System-Benefits and Implementation. *FGIC 1st Conference on Governance and Integrity*.

Majeed, N., Hilal, A., & Khan, A. N. (2023). Doctrinal Research in Law: Meaning, Scope and Methodology. *Bulletin of Business and Economics (BBE)*, *12*(4), 559–563. https://doi.org/10.61506/01.00167

Maqbool, M. A. (2023). Challenges Encountered by Quality Management System ISO 9001:2015 Implementation at the Universities. *PAKISTAN LANGUAGES AND HUMANITIES REVIEW*, *7*(III). https://doi.org/10.47205/plhr.2023(7-iii)52

Putri, K. T., Rhezza Pratama, N., & Dachyar, M. (2022). The Implementation of Anti-Bribery Management System Designed to Mitigate the Bribery Risk in State-Owned Enterprises: A Case Study of the Indonesia Agribusiness Industry. *Proceedings of the First Australian International Conference on Industrial Engineering and Operations Management, Sydney, Australia,* 3026–3034.

Ramese, W. K. D., Jayasooriya, S. D., & Lakmal, A. H. (2024). Adopting ISO 9001:2015 & ISO 21001:2018 EOMS to the Sri Lankan Higher Educational Institutions: A Review of Literature. *KDU Journal of Multidisciplinary Studies*, *6*(1), 145–157. https://doi.org/10.4038/kjms.v6i1.118

Rodríguez-Mantilla, J. M., Martínez-Zarzuelo, A., & León-Carrascosa, V. (2024). Identification of profiles in educational organizations as a result of the implementation of a quality management system. *International Journal of Educational Management*, *39*(8), 18–40. https://doi.org/10.1108/IJEM-01-2024-0064

Rybski, C., Jochem, R., & Homma, L. (2017). Empirical study on status of preparation for ISO 9001:2015. *Total Quality Management and Business Excellence*, *28*(9–10), 1076–1089. https://doi.org/10.1080/14783363.2017.1303886

Solin, I. K., Mahyuni, L. P., Fredy Maradona, A., & Darma, G. S. (2023). Integrated sustainable management system: Drivers, strategy, structure, and evaluation. *Sustinere Journal of Environment and Sustainability*, *7*(2), 147–160. https://doi.org/10.22515/sustinerejes.v7i2.310

Tančić, D. (2014). Harmonization of Management Systems According to the Requirements of Annex SL. In Prof. dr Živan Živković, Prof. dr Ivan Mihajlović, & Doc. dr. Predrag Đorđević (Eds.), *International May Conference on Strategic Management* (pp. 363–370). Univerity of Belgrade, Technical Faculty in Bor, Management Department.

Wirawan Irawanto, D. (2021). *Integrated Management System as a Tool to Improve Corporate Sustainability Performance in the Pharmaceutical Manufacturing Industry in Indonesia*.

Zutshi, A., & Sohal, A. S. (2005). Integrated management system : the experiences of three Australian organisations. *Journal of Manufacturing Technology Management*, *16*(2), 211–232. https://doi.org/10.1108/17410380510576840

**The Author(s);**

**Nur Athirah Syuhada Hasni** is a lecturer at UCYP University, Kompleks Yayasan Pahang, Jalan Tanjung Lumpur, Kampung Anak Air, 26060 Kuantan, Pahang. Tel.: +60-174877699. E-mail: athirah.syuhada@ucyp.edu.my

**Nordiana Ahmad** is a Lecturer at UCYP University, Kompleks Yayasan Pahang, Jalan Tanjung Lumpur, Kampung Anak Air, 26060 Kuantan, Pahang. Tel : +60-107735610. E-mail: nordiana_ahmad@ucyp.edu.my.

**Norsanariah Zainol Abidin** is a lecturer at UCYP University, Kompleks Yayasan Pahang, Jalan Tanjung Lumpur, Kampung Anak Air, 26060 Kuantan, Pahang. Tel. : +60-129670761. E-mail: sanariah@ucyp.edu.my