

CONTROLLING RISKS IN GOVERNMENT PROCUREMENT DEMAND MANAGEMENT: EVIDENCE FROM CHINESE UNIVERSITIES

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Abstract: Public procurement reforms increasingly seek to move risk control from ex post correction to the front end of the procurement cycle. This article examines that shift in the institutional setting of Chinese public universities, where procurement projects combine public-budget accountability, technical diversity, teaching and research urgency, and frequent external supervision. Drawing on a survey of 50 demand-management participants and semi-structured interviews and institutional documents from university procurement practice, the study evaluates the implementation of China's 2021 Measures for the Management of Government Procurement Demand and develops a grounded-theory model of demand-review risk control. The findings show that the measures have improved procurement satisfaction; however, the improvement remains limited due to several unresolved challenges, including a narrow understanding of procurement objectives, overlapping responsibilities between drafting and review processes, insufficient professional support, inadequate risk-oriented review mechanisms, incomplete quality feedback systems, and the need for further strengthening of internal control environments. The article proposes a four-part optimization mechanism: reconstructing the demand-review body, adopting risk-tiered review procedures, building a review-quality feedback loop, and strengthening an enabling internal-control climate. Although the evidence is drawn from China, the argument speaks to a broader international issue: how public organizations can design front-end procurement controls that are independent, proportionate, professionally informed, and capable of organizational learning.

Keywords: Public procurement; Demand management; Risk control; Internal control; Chinese universities; Grounded theory

1 INTRODUCTION

Public procurement is no longer understood only as an administrative purchasing procedure. International procurement frameworks increasingly frame it as a governance instrument that should support value for money, transparency, integrity, accountability, access, efficiency, risk management, and broader public policy objectives [1-2]. Yet many practical procurement failures arise before the tender is issued: the public buyer may define needs too vaguely, translate internal preferences into technical parameters, underestimate lifecycle and implementation risks, or separate the procurement file from the real performance objective. When these problems are left to tender evaluation, contract management, audit, or complaint procedures, later controls can only correct symptoms rather than improve the source of risk.

China provides a particularly useful setting for studying this front-end turn. In 2021, the Ministry of Finance issued the Measures for the Management of Government Procurement Demand, which require procuring entities to organize demand determination, prepare implementation plans, and conduct related risk-control management [3]. Compared with earlier reforms that emphasized procedural legality and competitive purchasing, the Measures shift responsibility toward the procuring entity and create a formal demand-review mechanism before procurement implementation. This development fits the broader trajectory of China's government procurement reform, which has gradually expanded from rule establishment toward performance, accountability, and governance capacity [4].

Chinese public universities are a revealing case for this reform. They use government procurement funds across laboratories, information systems, infrastructure services, teaching equipment, research support, and operational services. The procurement demand is therefore technically heterogeneous, time-sensitive, and often initiated by academic or administrative business units rather than procurement specialists. At the same time, universities are subject to budget, asset, finance, audit, discipline-inspection, and sectoral supervision. This makes the university context suitable for observing whether the newly formalized demand-review mechanism can actually identify risks at the source, or whether it becomes another procedural checkpoint.

The article asks three questions. First, how has the demand-management reform affected perceived procurement quality and satisfaction in Chinese universities? Second, what risk-control problems remain in the implementation of demand review? Third, what mechanism can better connect demand review with internal control, professional judgment, and organizational learning? The contribution is twofold. Empirically, the study provides mixed-methods evidence on how a national procurement-demand policy is translated into university practice. Theoretically, it extends public procurement

risk-control research by conceptualizing demand management as a front-end internal-control system rather than as a technical document-preparation task.

2 INSTITUTIONAL BACKGROUND AND ANALYTICAL LENS

2.1 Demand Management in China's Government Procurement Reform

The Measures define government procurement demand management as the activity through which the purchaser determines procurement demand, prepares the procurement implementation plan, and conducts related risk-control management [3]. This definition has two implications. First, demand management is not limited to writing specifications; it includes the management of legality, compliance, reasonableness, feasibility, and policy-function requirements at the source of procurement. Second, the purchaser bears primary responsibility for demand and implementation-plan quality. For universities, this means that procurement quality depends not only on procurement offices but also on business units, finance and asset departments, supervision bodies, technical experts, and leadership support.

The risk-control chapter of the Measures establishes a demand-review mechanism that includes a review working group, general review, key review, communication and feedback, and written archiving. The general review normally examines whether demand documents comply with laws, policies, budget and asset rules, and project characteristics. The key review gives more attention to complex or high-risk projects, especially where technical parameters, performance standards, single-source tendencies, policy functions, or supplier conditions may create compliance or value-for-money risks. Figure 1 summarizes this process in English for the submission version.

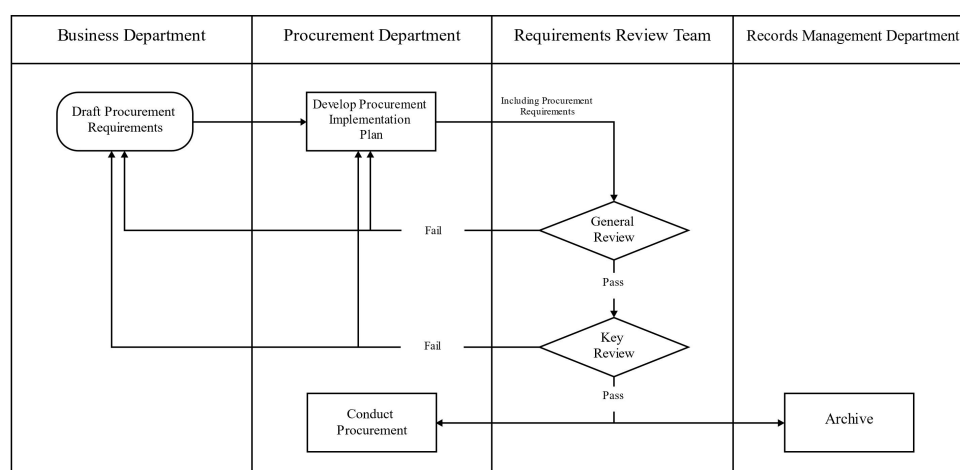


Figure 1 Risk-Control Process in Government Procurement Demand Management

2.2 Internal Control and Procurement Risk

The analytical lens of this article is internal control in public-sector organizations. Risk management and management-control systems in the public sector are commonly expected to identify risk, allocate responsibilities, structure control activities, improve communication, and support monitoring [5]. In procurement, these functions are inseparable from transparency and accountability [6]. However, excessive or poorly targeted control can also increase processing costs, reduce user satisfaction, and delay public-service delivery. The central governance challenge is therefore not simply to add controls, but to design controls that are proportionate to risk and connected to feedback.

International experience also shows that procurement risks vary across stages and contexts. Risk-management guidance stresses identifying, prioritizing, monitoring, and mitigating procurement risks rather than applying the same level of scrutiny to all cases [7]. Public procurement audit guidance similarly emphasizes the importance of documentation, traceability, and the alignment between front-end decision-making and subsequent implementation outcomes [8]. Studies on public procurement governance highlight that transparency and accountability mechanisms play an important role in improving decision quality, as procurement processes involve complex information flows, professional judgments, and coordination across different stages [9]. For universities, this perspective highlights the importance of effective coordination between technical demand identification and procurement review processes.

3 RESEARCH DESIGN

3.1 Survey and Interview Materials

The study uses a mixed-methods design. A questionnaire was distributed in late September 2024 through university procurement and administrative work groups. Before distribution, the questionnaire was tested with experienced procurement personnel to improve clarity and rigor. A total of 50 valid responses were obtained. The respondents included 28 men and 22 women; 24 heads of procurement departments, 9 procurement staff members, 9 heads of

business units, 5 business-unit staff members, and 3 respondents in other related roles. The sample is exploratory rather than nationally representative, but it covers the main actors involved in government procurement demand management, see Table 1.

Table 1 Institutional Profile of the Survey Sample (N = 50)

Dimension	Category	Number	Percentage
Institutional affiliation	Ministry-affiliated university	33	66%
Institutional affiliation	Municipal university	8	16%
Institutional affiliation	Provincial university	4	8%
Institutional affiliation	Other centrally administered university	5	10%
Region	Eastern China	40	80%
Region	Central China	2	4%
Region	Western China	5	10%
Region	Northeastern China	3	6%

On the basis of the survey results, the study further used semi-structured interviews and institutional materials to examine the mechanism behind the observed problems. The interviewees covered procurement departments, business units, finance departments, supervision bodies, and other personnel involved in demand management. The documentary materials included internal procurement rules, demand-review records, review-opinion feedback, rectification explanations, performance-acceptance materials, procurement-dispute materials, and typical project files. All interview and school information was anonymized and generalized.

3.2 Grounded-Theory Procedure

The qualitative part follows the procedural grounded-theory logic of open coding, axial coding, and selective coding [10-11]. First, interview records and textual materials were read repeatedly, and sentences related to the question 'why does demand review fail to fully perform risk-control functions?' were marked. Second, similar incidents and expressions were compared continuously and abstracted into initial concepts and categories. Third, the categories were reorganized through a condition-action/interaction-result logic to identify the relationships among risk-control conditions, review practices, and mechanism outcomes. Finally, selective coding was used to identify the core category and to connect the grounded model with the optimization paths proposed later in the article.

The coding was not designed to inflate the empirical section, but to make the logic of the recommendations traceable. Survey data identify the distribution of problems, while interview and document materials explain how these problems are produced and connected. During a final return to the materials, no new concept emerged that required changing the four main categories, indicating relative theoretical saturation for the purpose of this applied policy study.

4 SURVEY FINDINGS: EFFECTS AND REMAINING GAPS

4.1 The Measures Improved Satisfaction, But the Improvement Was Limited

Most respondents reported that the Measures improved procurement satisfaction. Overall, 82% perceived some improvement, but only 14% reported a great improvement. This result suggests that the new demand-management controls have produced a visible governance effect, especially by clarifying responsibility and adding a front-end review node. However, the modest share of strong improvement also indicates that the mechanism has not yet fully converted formal risk control into higher perceived procurement quality, see Figure 2.

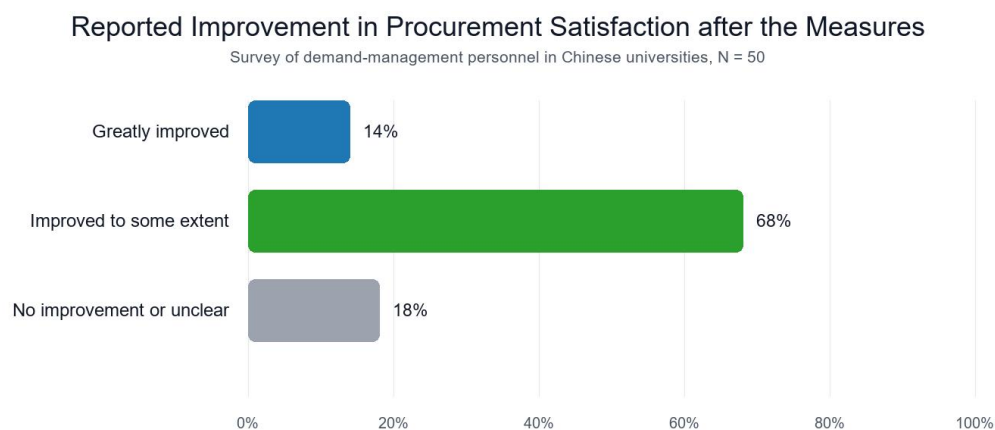


Figure 2 Reported Improvement in Procurement Satisfaction after the Measures

Role differences help explain the limited improvement. Department heads tended to report greater improvement than general staff members because leadership roles are more sensitive to long-term compliance, decision security, and

team-level performance. Front-line staff more directly experience additional review nodes, coordination costs, and document complexity. Procurement heads also tend to benefit more from strengthened risk controls because their work is more exposed to supplier selection, price reasonableness, complaint handling, and audit accountability.

4.2 Target Cognition Is Still Narrow

The survey reveals a cognition gap in the understanding of demand-management objectives. A total of 86% of respondents selected compliance with national laws and regulations, and 84% selected consistency with budget, asset, and financial management rules. Only 58%, however, selected compliance with national mandatory standards. This suggests that many participants equate compliance with procedural completeness, approvals, and budget matching, while underestimating the substantive value of technical, safety, and sectoral standards. In front-end procurement governance, this narrow understanding creates hidden risks because specifications can appear procedurally compliant while failing to express mandatory performance or safety requirements.

4.3 Review Thresholds and Review Forms Vary Widely

The distinction between general review and key review is intended to reduce unnecessary intensive review and improve efficiency. In practice, universities define the scope of the two review types very differently. Excluding respondents who were unclear about their institution's rules, 26% reported that key review was conducted regardless of project amount, while 54% reported that their university set monetary thresholds. The reported threshold for general review ranged from RMB 30,000 to RMB 10 million, with an average of RMB 3.10 million; the threshold for key review ranged from RMB 50,000 to RMB 10 million, with an average of RMB 6.22 million. Such variation indicates that the current mechanism is still searching for a workable balance between risk control and efficiency.

The number and composition of demand-review groups also varied. Respondents reported review groups ranging from 3 to 16 members, with a mean and median of 4.5. The most common members were procurement departments, business units, industry experts, finance departments, and audit or supervision departments. From the perspective of internal control, the most important weakness is that the unit drafting the demand is often also included as a reviewer. Although business units know the demand best, self-review weakens role separation and can hide technical preference or biased specification risks, see Table 2.

Table 2 Descriptive Statistics for the Size of Demand-Review Groups

Item	Minimum	Maximum	Mean	Standard deviation	Median
Number of members	3	16	4.5	2.1	4.5

Review methods further show a cautious but sometimes rigid implementation pattern. Among respondents who knew their institution's practice, 60% selected meeting-based review and 32% selected countersignature review. Other methods included third-party review, online platform review, communication-based review, and mixed forms such as online countersignature for general review and offline meetings for key review. Meeting-based review is useful for complex projects because it enables direct discussion, but applying it too broadly can increase time costs and reduce satisfaction, see Table 3.

Table 3 Perceived Position of Demand Review among Six Procurement Stages

Dimension	Minimum	Maximum	Mean	Median	Standard deviation
Importance	1	6	3.714	4	1.244
Difficulty	1	6	3.357	3	1.501
Risk	1	6	2.714	3	1.651

Compared with demand drafting, implementation-plan determination, procurement implementation, contract conclusion, and performance acceptance, respondents positioned demand review as moderately important, moderately difficult, and only moderately risky. This result is revealing: universities increasingly recognize demand review, but they have not yet assigned it the high expectation that a front-end risk-control mechanism requires.

5 GROUNDED-THEORY RESULTS

5.1 Open Coding: Initial Concepts and Categories

Open coding shows that the risk-control difficulty is not a single procedural defect. It is produced by the interaction of target cognition, role structure, professional capacity, procedural matching, feedback, and the broader internal-control environment. Table 4 presents representative coding examples translated and condensed from anonymized interview and document materials.

Table 4 Examples of Open Coding from Interview and Documentary Materials

Condensed material statement	Initial concept	Initial category
Rules have been issued, but some teachers still understand demand management as merely going through the procurement procedure.	Compliance understood mainly as procedure	Narrow target cognition
Technical parameters, mandatory standards, and asset-allocation standards are held by different departments.	Standards information is fragmented	Narrow target cognition
The business unit knows the demand best, but if it reviews its own draft, real risks are hard to expose.	Drafting and reviewing roles overlap	Overlapping responsibilities
Procurement, finance, and supervision departments all participate, but each department can review only part of the issue.	Internal professional boundaries are limited	Overlapping responsibilities
For complex equipment or service projects, it is difficult to judge parameter reasonableness without industry experts.	Technical judgment depends on external expertise	Insufficient professional support
Some low-value projects have high technical risks, so drawing the line only by amount is not enough.	Monetary thresholds cannot cover all risks	Ambiguous tiering standards
Simple projects are reviewed in meetings because that seems safe, but the procurement cycle becomes longer.	Low-risk projects bear high review cost	Rigid review form
For key projects, several rounds of countersignature still fail to clarify risks; a meeting is needed in the end.	Complex projects require substantive discussion	Weak substantive key review
Some review comments are general, and later it is hard to trace whether revision was completed.	Revision implementation lacks verification	Weak process traceability
Problems found in acceptance, complaints, or audits rarely return to the demand-review template.	Outcome information does not feed back to the front end	Disconnected result feedback
When leaders pay attention, implementation moves quickly; otherwise review becomes document retention.	Leadership attention affects enforcement	Insufficient internal-control support
Business teachers focus on buying quickly, while training on demand standards and risk points is still insufficient.	Staff capability and standard awareness are weak	Insufficient internal-control support

After several rounds of comparison, the open-coding stage generated nine initial categories: narrow target cognition, overlapping responsibilities, insufficient professional support, ambiguous tiering standards, rigid review form, weak substantive key review, weak process traceability, disconnected result feedback, and insufficient internal-control support. These categories correspond closely with the survey findings, but they also explain why the survey problems are connected.

5.2 Axial Coding: Main Categories and Logical Relationships

In the axial-coding stage, the initial categories were reorganized around the relationships among causal conditions, action and interaction strategies, contextual support, and consequences. Four main categories emerged: responsibility-body reconstruction, risk-tiered and classified review, quality feedback loop, and internal-control enablement. Table 5 shows how these categories integrate the open-coding results and directly correspond to the optimization paths in Section 6.

Table 5 Axial-Coding Categories and Their Correspondence with Optimization Paths

Main category	Initial categories included	Logical meaning	Corresponding optimization path
Responsibility-body reconstruction	Overlapping responsibilities; insufficient professional support	Clarifies boundaries among demand drafting, procurement organization, finance supervision, and external professional judgment so that review has independence, expertise, and checks and balances.	Optimize the demand-review body
Risk-tiered and classified review	Ambiguous tiering standards; rigid review form; weak substantive key review	Allocates review intensity according to monetary scale, technical complexity, policy sensitivity, implementation risk, and historical disputes, balancing control and efficiency.	Optimize the review procedure
Quality feedback loop	Weak process traceability; disconnected result feedback	Connects review opinions, revision feedback, procurement implementation, performance acceptance, complaints, and audit supervision into a mechanism for evaluating review quality and updating rules.	Build a review-quality feedback mechanism
Internal-control enablement	Narrow target cognition; insufficient internal-control support	Uses leadership attention, policy communication, staff training, information platforms, and cross-department coordination to improve enforcement and shared risk awareness.	Improve the risk-control climate

The four categories form a progressive mechanism. Responsibility-body reconstruction answers who can conduct an effective review. Risk-tiered and classified review answers what level of review should be used for different projects. The quality feedback loop answers how review effects are verified and corrected. Internal-control enablement answers how the mechanism becomes stable rather than episodic. If review bodies are not independent, tiered review may become internal confirmation. If procedures are not matched to risk, feedback cannot distinguish under-review from

over-review. If feedback does not enter institutional templates, experience cannot become rules. If the internal-control environment is weak, even well-written procedures may remain ceremonial.

5.3 Selective Coding: Core Category and Model

Selective coding integrates the four main categories into the core category of this study: a source-identification, professional-review, process-feedback, and environmental-support mechanism for demand-management risk control. This core category means that demand review should not be treated as the simple addition of a new approval node. Rather, it should connect demand formation, independent review, revision, implementation, evaluation, and rule updating into a closed loop that is checkable, proportionate, traceable, and capable of learning.

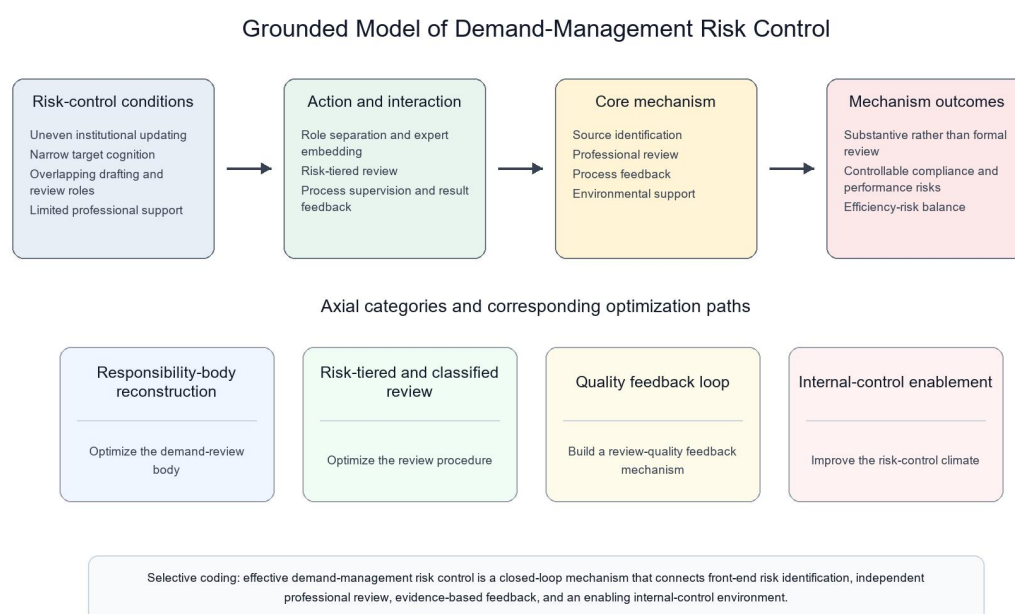


Figure 3 Grounded Model of Demand-Management Risk Control

Figure 3 also clarifies the logic of the following optimization paths.

The empirical conditions identified by the survey and interviews do not point to isolated fixes; they require a mechanism design. For responsibility-body reconstruction, the review body must be made more independent and professional. For risk-tiered review, the procedure must be matched to project risk rather than only to a monetary threshold. For quality feedback, process records and procurement outcomes must be used to evaluate whether demand review actually prevented risk. For internal-control enablement, leadership support, training, information systems, and cross-department coordination must make the mechanism executable.

6 OPTIMIZATION MECHANISM AND INTERNATIONAL IMPLICATIONS

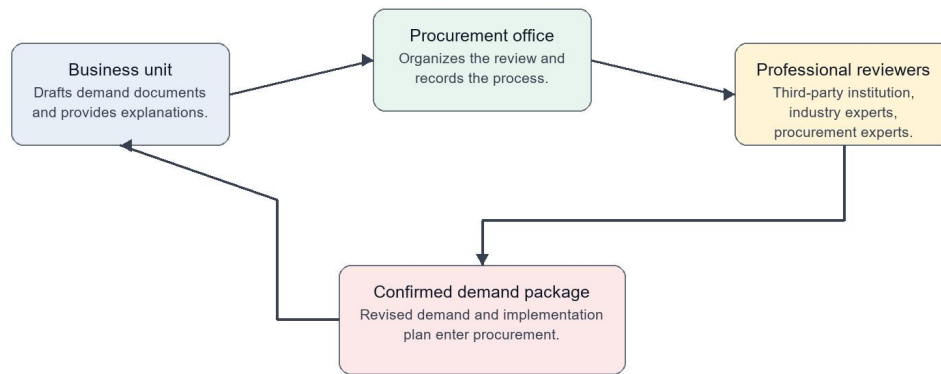
The survey and grounded-theory results jointly indicate that the optimization of demand-management risk control in Chinese universities should focus on four mutually reinforcing paths. Although the proposals are grounded in China's institutional context, they are relevant to public organizations in other jurisdictions that face the same tension between front-end control and procurement efficiency.

6.1 Reconstruct the Demand-Review Body

The first path is to reconstruct the review body. The demand-drafting task and the demand-review task are consecutive but incompatible control functions. When the business unit that drafts the demand also acts as a reviewer of that demand, the review mechanism cannot fully expose technical preference, feasibility risk, or unreasonable performance requirements. Therefore, business units should provide explanations, evidence, and revisions, but they should not dominate the substantive review of their own documents.

A more effective structure is a professionally led review group organized by the procurement office and supported by external or semi-external expertise. Industry experts can judge technical reasonableness, procurement-policy experts can evaluate compliance and competition effects, finance and asset departments can examine budget and asset consistency, and supervision or audit bodies can monitor high-risk items and traceability. Third-party institutions need not be used for every project; rather, they should be introduced where internal professional capacity is insufficient or where project complexity, policy sensitivity, or historical disputes justify a stronger independent review, see Figure 4.

Improved Demand-Review Working Mechanism



Role logic: drafting, organizing, professional review, revision, and final confirmation are separated but connected.

Figure 4 Improved Demand-Review Working Mechanism

6.2 Adopt Risk-Tiered and Classified Review Procedures

The second path is to make review procedures proportionate to project risk. Front-end control should not be expanded without limit. If universities review all projects through meetings and low thresholds, risk avoidance may be visible to auditors but procurement time and labor costs will increase. If review is too light, high-risk projects may enter procurement with biased parameters, unclear performance targets, unrealistic budgets, or weak implementation plans. The procedure should therefore be calibrated by multiple indicators: monetary scale, technical complexity, standardization of the object, policy-function requirements, supplier-market structure, implementation risk, complaint history, and urgency.

For projects with clear demand, controllable risk, and small monetary scale, a simplified review is appropriate. Online countersignature or communication-based review can focus on budget consistency, document completeness, basic legality, and obvious risk screening, normally within one to three working days. For complex, high-value, technically sensitive, or dispute-prone projects, a deep review should be used. Meeting-based review can organize demand justification, risk screening, and plan optimization, with attention to non-discriminatory technical parameters, budget reasonableness, procurement-policy functions, and implementation feasibility. A dynamic adjustment rule should also be added: ordinary projects should be escalated if unclear demand or new risk appears, while key projects may be simplified when several rounds of evidence confirm that demand, standards, and risks are stable.

6.3 Build a Review-Quality Feedback Loop

The third path is to evaluate the quality of the review itself. Demand-review groups are given risk-control responsibilities, but a review can still become formalistic if comments are vague, revisions are not checked, and later procurement outcomes are not fed back to the front end. A review-quality feedback mechanism turns demand review from passive compliance into active improvement.

The feedback loop should have three layers. First, universities should build a digital foundation: standardized review templates, risk checklists, evaluation scales, issue logs, and project databases connecting demand files, review opinions, revision records, implementation results, supplier feedback, complaints, acceptance records, and audit findings. Second, process supervision and ex post validation should be combined. Process supervision checks whether review opinions cover technical neutrality, budget reasonableness, policy-function requirements, and key risk points; ex post validation tests whether complaints, audit issues, performance disputes, or cost-quality mismatches indicate missed or excessive review. Third, feedback should be classified by severity. Minor problems can be corrected within the procurement department; ordinary review-quality problems should trigger a cross-department review and improvement plan; major missed compliance risks or serious mismatches between review conclusions and project outcomes should involve audit or disciplinary supervision and responsibility identification.

The key is to ensure that feedback becomes institutional memory. Universities can prepare quarterly review-quality analysis reports and annual updates of demand-review rules, templates, checklists, and operating guides. In this way, problems found in acceptance, complaints, or audits return to the stage where future demand is defined.

6.4 Strengthen an Enabling Internal-Control Climate

The fourth path is to improve the internal-control environment. The survey shows that respondents attach importance to support from business units, university leadership, procurement departments, finance departments, and information-technology departments. It also shows that demand management requires support from procurement-policy experts, data and information-technology experts, finance experts, and legal experts. These results indicate that

demand-review quality depends on organizational climate as much as on formal rules, a point consistent with public-sector research linking perceived risk management, internal control, and fraud prevention [12].

University leadership should make demand management part of routine governance rather than an occasional response to inspection. Policy communication can be embedded in induction training, cadre conversations, research-funding training, procurement case briefings, and internal procurement portals. Staff training should focus first on government procurement laws and policies, then on demand standards, procurement process norms, and implementation cases. Information systems can replace fragmented offline approvals with traceable electronic processes and standardized risk screening. The goal is not to make every staff member a procurement specialist, but to make risk awareness and standard awareness part of everyday demand formation.

6.5 International Implications

The Chinese university case has implications beyond China. First, it suggests that front-end demand governance deserves more attention in public procurement research. Many international frameworks emphasize transparency, competition, integrity, and accountability, but the case shows that these goals can be undermined before tendering if demand is poorly specified or internally biased. Demand definition is also where public procurement for innovation and other policy functions can be enabled or constrained [13]. Second, proportional control is essential. Public organizations need risk-sensitive thresholds and review forms rather than uniform review intensity. Third, role separation must be adapted to professional knowledge. The unit that knows the need should not be excluded from the process, but its role should be explanation and revision rather than self-approval. Fourth, procurement risk control should be a learning system. Complaints, audit findings, supplier performance, and acceptance results should update future demand templates and risk checklists.

These implications are particularly relevant to universities, hospitals, research institutes, and other professional public organizations whose procurement demands are technically specialized and internally generated. Comparative procurement reforms in different institutional settings show that formal reform must be translated into workable governance capacity rather than copied as a rule package [14-15]. For such organizations, the practical question is not whether more control is needed, but how to design a control mechanism that recognizes professional complexity while preserving independence, transparency, and value for money. The same front-end logic matters when procurement is expected to support sustainability and broader public objectives, because poorly specified demand weakens policy implementation before market competition begins [16]. The grounded model developed here offers one way to conceptualize that balance.

7 CONCLUSION

This article examined government procurement demand-management risk control in Chinese universities after the implementation of China's 2021 Measures for the Management of Government Procurement Demand. The evidence shows that the Measures improved procurement satisfaction, but the improvement was not strong enough to suggest that front-end risk control has become fully substantive. Survey data identified gaps in target cognition, review thresholds, review-group composition, review methods, and attention to demand review. Grounded-theory analysis of interviews and documents further explained these problems through four main categories: responsibility-body reconstruction, risk-tiered and classified review, quality feedback loop, and internal-control enablement.

The proposed mechanism connects source identification, professional review, process feedback, and environmental support. For Chinese universities, it offers practical paths for improving review independence, review proportionality, review-quality evaluation, and the organizational climate of internal control. For international procurement scholarship, it highlights the importance of treating demand management as a front-end risk-control system. Future research can expand the sample, compare university and non-university public organizations, and test whether the proposed mechanism improves procurement performance, complaint rates, project duration, and user satisfaction over time.

COMPETING INTERESTS

The authors have no relevant financial or non-financial interests to disclose.

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REFERENCES

- [1] OECD. Recommendation of the Council on Public Procurement. OECD Legal Instruments, 2015. Available at: <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0411>.
- [2] UNCITRAL. UNCITRAL Model Law on Public Procurement. United Nations Commission on International Trade Law, 2011. Available at: https://uncitral.un.org/en/texts/procurement/modellaw/public_procurement.

- [3] Ministry of Finance of the People's Republic of China. Measures for the Management of Government Procurement Demand (Cai Ku [2021] No. 22). Ministry of Finance of the People's Republic of China, 2021. Available at: https://gks.mof.gov.cn/guizhangzhidu/202105/t20210510_3699403.htm.
- [4] Wang P. Twenty Years of Government Procurement Reform in China: Lessons and the Way Forward. In: *Reforming Public Procurement Law*. Hart Publishing, 2024: 297-320. DOI: 10.5040/9781509967995.ch-017.
- [5] Bracci E, Mouhcine T, Rana T, et al. Risk management and management accounting control systems in public sector organizations: a systematic literature review. *Public Money & Management*, 2022, 42(6): 395-402. DOI: 10.1080/09540962.2021.1963071.
- [6] Bovis C. The Effects of the Principles of Transparency and Accountability on Public Procurement and Public-Private Partnerships Regulation. *European Procurement & Public Private Partnership Law Review*, 2009, 4(1): 19. DOI: 10.21552/eppl/2009/1/2.
- [7] OECD. Managing Public Procurement Risks in Romania. OECD Public Governance Reviews. OECD Publishing, 2025. DOI: 10.1787/5dfda60e-en.
- [8] OECD. Audit of Public Procurement. SIGMA Public Procurement Briefs, 2016. DOI: 10.1787/71e3e65f-en.
- [9] Kohler J C, Dimancesco D. The risk of corruption in public pharmaceutical procurement: how anti-corruption, transparency and accountability measures may reduce this risk. *Global Health Action*, 2020, 13(sup1): 1694745. DOI: 10.1080/16549716.2019.1694745.
- [10] Corbin J M, Strauss A. Grounded theory research: Procedures, canons, and evaluative criteria. *Qualitative Sociology*, 1990, 13(1): 3-21. DOI: 10.1007/BF00988593.
- [11] Corbin J, Strauss A. *Basics of Qualitative Research (3rd ed.): Techniques and Procedures for Developing Grounded Theory*. SAGE Publications, 2008. DOI: 10.4135/9781452230153.
- [12] Ilias A, Baidi N, Ghani E K, et al. Examining government officials' perceived risk management and internal control in combating fraud in the public sector. *Edelweiss Applied Science and Technology*, 2024, 8(3): 125-144. DOI: 10.55214/25768484.v8i3.804.
- [13] Wan R. Public procurement of innovation policy: Competition regulation, market structure and dominant design. *Journal of Public Procurement*, 2014, 14(4): 473-494. DOI: 10.1108/JOPP-14-04-2014-B002.
- [14] Chania A, Demetrashvili K. Public Procurement Reform in Georgia. In: *Advances in Electronic Government, Digital Divide, and Regional Development*. IGI Global, 2017: 151-169. DOI: 10.4018/978-1-5225-2203-4.ch007.
- [15] Basheka B C. Public Procurement Governance: Toward an Anti-corruption Framework for Public Procurement in Uganda. In: *Public Procurement, Corruption and the Crisis of Governance in Africa*. Springer International Publishing, 2021: 113-141. DOI: 10.1007/978-3-030-63857-3_7.
- [16] Caranta R. Public procurement for the SDGs - rethinking the basics. In: *Sustainability in Public Procurement, Corporate Law and Higher Education*. Routledge, 2023: 3-21. DOI: 10.4324/9781003252153-2.