Policies and Actions of Accreditation and Quality Assurance Bodies to Counter
Corruption in Higher Education

Project Report | February 2019

Irene Glendinning | Stella-Maris Orim | Andrew King
Coventry University, UK

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1. Introduction

This report sets out the results from a study conducted during 2017-18 for the Council for Higher Education Accreditation / CHEA International Quality Group (CHEA/CIQG). This study builds on recommendations from the IIEP/UNESCO and CHEA/CIQG Advisory Statement prepared by Sir John Daniel (IIEP & CIQG 2016), consolidating contributions from a panel of expert witnesses[1]. The study was designed to capture information about actions and responses of accreditation and quality assurance bodies (AQABs) for addressing different forms of corruption in higher education. The results, recommendations and conclusions in this report are based on the findings of the study.

The report should be read by people from all parts of the world who are concerned with quality and standards in higher education. The report will also be of interest to people concerned with discouraging corruption in higher education. The findings in this report are specifically addressed to organisations with responsibility for assuring quality and integrity of education or research, and the governmental bodies overseeing their operation and providing funding for their activities.

Quality and standards are universally acknowledged as fundamental to sound governance, delivery and outcomes in education and research. However, without effective oversight and accountability, covering all aspects of an educational system, there is no way of knowing whether learning and teaching is effective, whether research has been conducted rigorously and ethically, and whether academic qualifications of results from research can be trusted.

Together with a robust internal institutional quality assurance system, accreditation bodies and quality assurance agencies play a crucial role in monitoring education providers and research institutes to ensure that the recognised standards are maintained and necessary quality processes are operating as intended across all areas of an institution.

Corruption in its many forms is a great threat to the integrity of education and research, not least because it undermines the trust placed in the educational process, devalues academic qualifications and forces the outcomes of research to be questioned. All stakeholders interested in quality and standards carry tacit responsibility for identifying, addressing and helping to eradicate corrupt practices. However, it is difficult for individuals involved in quality assurance activities to "swim against the tide" either within or externally to an institution.

Strong commitment and leadership on integrity are essential prerequisites for addressing corruption and malpractice within an institution. A key complementary component in supporting integrity, together with upholding quality and standards, comes from external scrutiny, both at institutional level and for the whole HE sector, regionally or nationally. In most educational systems, this monitoring is provided by at least one designated (or sometimes selected) accreditation or quality assurance body (AQAB), usually with overarching oversight from a government department or committee.

This research was needed because there has been no previous research that seeks to discover how rigorously AQABs in different parts of the world include scrutiny for different forms of corruption as part of their institutional evaluations and to what extent the outcomes from this process influence institutional practices or discourage malpractice and corruption.

It is important to be clear what we mean by "corruption", because this is a very broad term with many connotations and interpretations. We have adopted the definition stated in the Advisory Statement (IIEP &CIQG 2016: 1). In general, the examples of corruption included in this study focus on intentional actions of individuals or groups rather than misconduct through accident, incompetence or ignorance. However, it is important to recognize that there is no common agreement across the world about what constitutes corruption.

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[1] From Canada, Lebanon, India, Mauritius, Nigeria, Slovakia, the United Kingdom, the USA, UNESCO/IIEP, CHEA/CIQG

The scope of the research is based on the main six categories included in the 2016 *Advisory Statement:* specifically, the research will focus on how AQABs are responding to corruption in the following areas of HE:

- the regulatory process
- the teaching role
- student admission and recruitment
- student assessment
- credentials and qualifications
- research and publication

The study also explores how different AQABs are raising public awareness of corruption in education as a means of countering the problems and improving educational integrity (adapted from IIEP & CIQG 2016).

For the purpose of this study, AQABs include organizations that

- conduct institution-wide audits to evaluate quality assurance systems and standards;
- evaluate specific subjects or programs for disciplinary rigor, quality and standards;
- accredit programs leading to professional qualifications or license to practice;
- provide oversight of research institutions;
- focus on quality assurance and standards at specific levels of education;
- are established to provide access to sources of funding for institutions and their students.

It was important to take into account these different remits during data analysis because responsibility for oversight depends on the status and purpose of different AQABs. Awareness of contextual factors, such as geographical and subject-based constraints for AQABs, is important when interpreting responses.

The level of participation in this study and the quality of responses depended on clear assurances about non-disclosure, confidentiality and anonymity, particularly when information could be perceived as negative or critical of the AQAB. These aspects were essential components of the ethical approval process, which was secured before the research could begin. However such

constraints have not precluded identifying specific AQABs in the research findings, provided that explicit permission was granted.

There is a concern that AQABs in countries that are seen as leaders in education and quality assurance practices will see corruption as a problem that does not apply to them. However, as the 2016 report and the literature review (Appendix 5) demonstrate, education systems in all parts of the world are affected by corruption.

Conversely, it must be acknowledged that there are additional challenges to higher education in parts of the world where corruption is endemic and seen as normal in the day-to-day functioning of government, business and civil society, as evaluated by Transparency International (2017, 2013) and observed in earlier research by some members of the current team (Glendinning 2013; Foltýnek et al 2017).

The study surveyed AQABs throughout the world using an on-line questionnaire, supplemented by interviews with carefully selected individuals

The evidence collected during the study is presented in this report in three parts:

- Analysis of survey data
- Analysis of interview data
- Literature review

The focus of each AQAB's activities, especially for some professional bodies and programme-level accreditation agencies, determines whether it is appropriate for audit panels to undertake deep inspections of the ethical practices related to corruption in the institutions they are visiting. Differing relationships between the AQABs and the institutions, faculties or programme teams, whether or not the accreditation is voluntary, and factors such as what benefits arise from having accreditation or how much it costs the institution to be accredited, can also influence the conduct of the exercise and the depth of the scrutiny permitted, expected or required.

The discussion section brings together findings from different elements of the study, leading to recommendations for AQABs.

2. Methodology

A mixed-methods approach was adopted to capture largely quantitative data from the whole population at the initial stage, while allowing free-format comments, in parallel with more detailed qualitative information, using a smaller number of semi-structured interviews. The initial data capture was conducted in the form of an on-line survey. The decision was taken not to translate the survey into different languages, as it became clear that most AQABs were able to find at least one respondent to complete the on-line survey with a reasonable command of English.

In order to maximize the response rate and simplify the data analysis, the survey was kept as concise and clear as possible, using dropdowns and tick-boxes where appropriate, but with space for free-text comments to supplement responses. As the scope of the survey was broad and appreciating that some of the six categories would not apply to all AQABs, the central questions were organized into six optional blocks of questions, where the first question in each block allowed the respondent to skip all questions on that specific category.

Over 300 organizations on the contact list (AQABs and networks) were sent an email invitation asking them to participate, including a description of the research, guidance notes and a link to the survey. Contacts were advised to familiarize themselves with the 2016 Advisory Report before completing the survey, specifically the definitions (IIEP & CIQG 2016: 5-8). Selected participants were then invited to take part in the more detailed follow-up research by semi-structured interview.

After January 2018 it was decided to relaunch the questionnaire to try to attract more responses. The opportunity was taken to correct a few errors in questions that had been noticed after the original launch of the survey. In consequence there were some differences between questions and responses for the first (45) and second (24) sets of participants. These differences will be made clear during the presentation of the results (section 4) and are detailed in Appendix 3.

At the second launch in February 2018 the outstanding participants that had not responded to the first call were individually emailed with a personalized request to participate in the survey. After the closure of the survey in April 2018, the two sets of results were combined to produce a single set of responses for analysis, with the changed questions kept separate.

Analysis of the survey data was conducted using descriptive statistics for quantitative data and thematic analysis for the free-text responses. The initial analysis identified participants and non-participants for inclusion in the second stage. The follow-up research focused on AQABs that (a) had not responded to the first and second invitations and (b) had expressed interest in the research, where there appeared to be further relevant information to explore. Interviews were also conducted with individuals and representatives from other organizations that had an interest in higher education quality assurance and accreditation, to add to the evidence about how AQABs were responding to corrupt practices.

Telephone and technology such as Skype were used to conduct interviews where it was impracticable to hold interviews face-to-face. The structured interviews were normally audio-recorded, with permission from the subjects, before being transcribed. In a few instances where audio recording was not possible, contemporaneous notes of the conversation were recorded manually.

The interview questions were bespoke to each interviewee but based around a set of themes that were central to the research questions for this study. The main questions were sent to the interviewees in advance to allow them to consider their responses and gather any supplementary information. All interviewees were sent information about the study in advance and asked to sign an informed consent form. Subsequently, interviewees were all sent a copy of the relevant parts of drafts of this report and asked to verify any content attributed to them or their organization.

Some of the interview data will be used to create case studies demonstrating challenges encountered by AQABs and ways of addressing them.

3. Results

3.1 Results Overview

Over 300 contacts, consisting of representatives from AQABs and networks of AQABs from across the world, were contacted by email between November 2017 and March 2018. Almost all the AQABs contacted are acknowledged by CIQG as "competent authorities" for the countries in which they operate.

A total of 71 responses were collected via the on-line questionnaire, 46 from the first version and 25 from the second version. One response (from a university) was not included in the analysis because the participant did not represent the target audience for the survey. Two other responses were merged because they were from the same organization. Therefore, the final tally of questionnaire responses was 69.

A total of 17 formal interviews were conducted with a range of people, either face-to-face or by virtual communications tools such as Skype, and a further five informal discussions took place with contributors, either in person or by email (Appendix 2).

The subjects of the additional interviews were a much broader constituency than initially envisioned at the design stage. They included both government appointees and non-governmental organizations (NGOs), particularly focusing on people involved in counter-corruption activities, who have an interest in improving educational standards. The main reason for adoption of a broader focus was the dearth of good practice examples from AQABs in some of the on-line questionnaire responses.

The analysis of results is presented in two parts. The first part summarizes the main findings from the on-line questionnaire. The analysis of the interview data then follows. Both analyses are organized according to the six types of corruption defining the scope of this study. In the interests of brevity, the qualitative feedback from the questionnaire has been summarized in the main report and a list of relevant comments from participants is available in Appendix 4.

3.2 Analysis of on-line questionnaire responses

3.2.1 Survey participants

The identity of questionnaire participants is confidential. However, it is possible to determine from the responses (Figure 1) that of the 69 respondents, 25 (39 percent) saw the main purpose of their organization as "Educational standards and quality", 19 (30 percent) were concerned principally with subject-specific accreditation, 13 (20 percent) with professional program accreditation and seven (11 percent) with approval and authorization. Of the five respondents who chose not to answer this question, three clarified that they were involved with quality assurance and/or accreditation and/or licensing, one was concerned with advocacy and support for "programmatic accreditation and promote good

accreditation practice", and the final respondent had a remit for "Supervision of academic ethics and procedures in institutions of science and education". Some of the respondents were representatives of networks (three respondents) or of associations of professionals or accreditors (two respondents).

In the analysis below, where narrative feedback from participants has been included, the quotations have been anonymized, and any spelling mistakes have been corrected. Other than those changes, the feedback is presented as it was provided.

Main purpose of the AQAB - select one
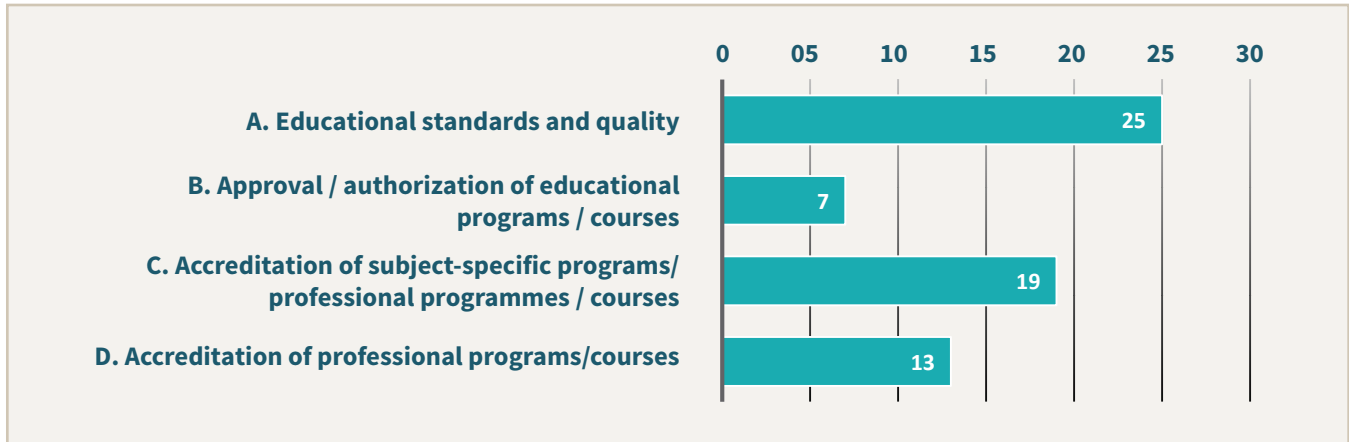
Figure 1: What is the main purpose of your organization? (Question 3 - Number of responses)

Also concerning the participants are the levels of operation (Figure 2) and the area of operation (Figure 3) of the AQAB.

Levels of AQAB operation - select all that apply
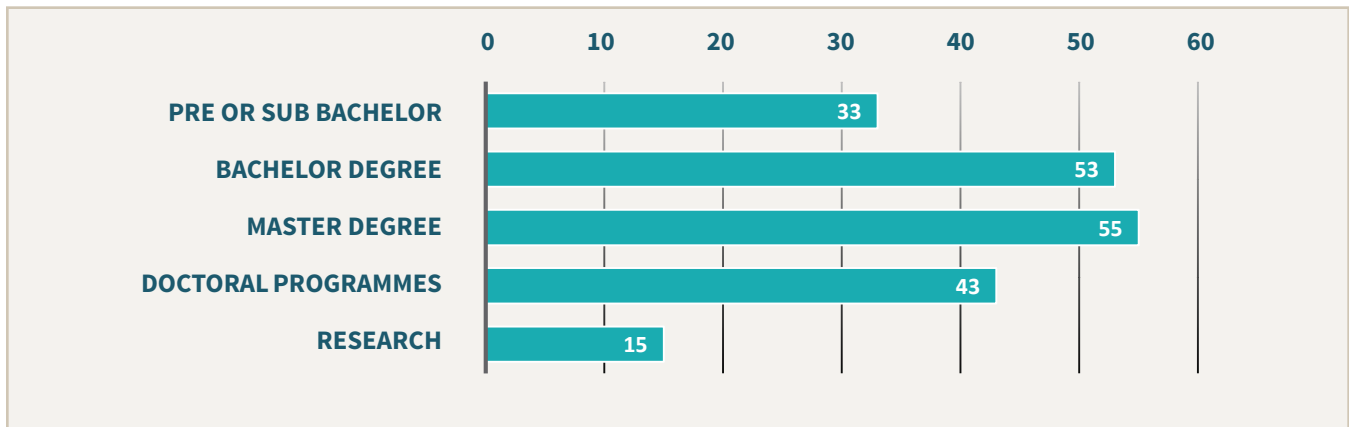
Figure 2: Levels of operation (Question 5b - Number of responses)

As this study aims to capture evidence about AQABs globally, it is possible to analyze the geographical coverage of the respondent organizations. The international remit of some of the respondent organizations has ensured that, despite having only 69 responses to the survey, the survey does encompass most regions of the world (Table 1), but not all countries. The table is a rough guide, based on the number of mentions of countries or regions in a question about geographical coverage. As will be seen later, the interviews with respondents help to fill some of the gaps.

Area of operation - select all that apply
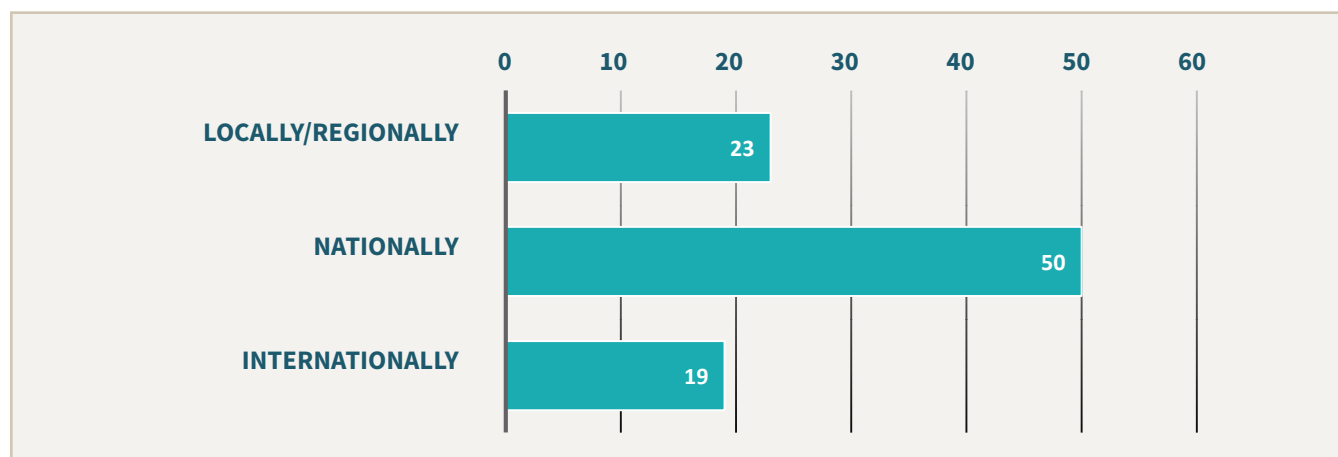
Figure 3: Area of operation (Question 5 - Number of responses)

Table 1: Regional coverage of the on-line questionnaire

REGION	INVITATIONS		RESPONSES		COVERAGE *	
	#	%	#	%	#	%
AFRICA	22	7.17	3	4.35	6	5.26
ASIA	51	16.61	6	8.70	14	12.28
AUSTRALASIA	5	1.63	3	4.35	3	2.63
CENTRAL & SOUTH AMERICA	26	8.47	2	2.90	13	11.40
EUROPE	87	28.34	17	24.64	21	18.42
MIDDLE EAST	19	6.19	6	8.70	18	15.79
NORTH AMERICA	97	31.60	32	46.38	39	34.21
TOTALS	307		69		114	

* reflects AQABs covering more than one region

Table 1 shows how the geographical imbalance of responses received compares to that of the invitations to the 307 target participants. The invitations sent out were based on CIQG membership lists. Comparing percentages of invitations to percentages of responses in different regions suggests a reluctance to participate by some AQABs in parts of Africa, Asia-Pacific and Central and South America. Relatively higher rates of response in the Middle East, Australasia and North America may reflect the willingness of AQABs in those countries to discuss corruption, plus the level of interest in addressing corruption in higher education. The higher figures for "coverage" compared to "responses" indicate that AQAB respondents from other regions are operating there.

The survey participants were asked: *"Please indicate to what extent your organization is interested in"* each of the categories making up the scope of the research (Figure 4). For this question the last category was separated into "research" and "academic publications".

Level of importance to AQAB
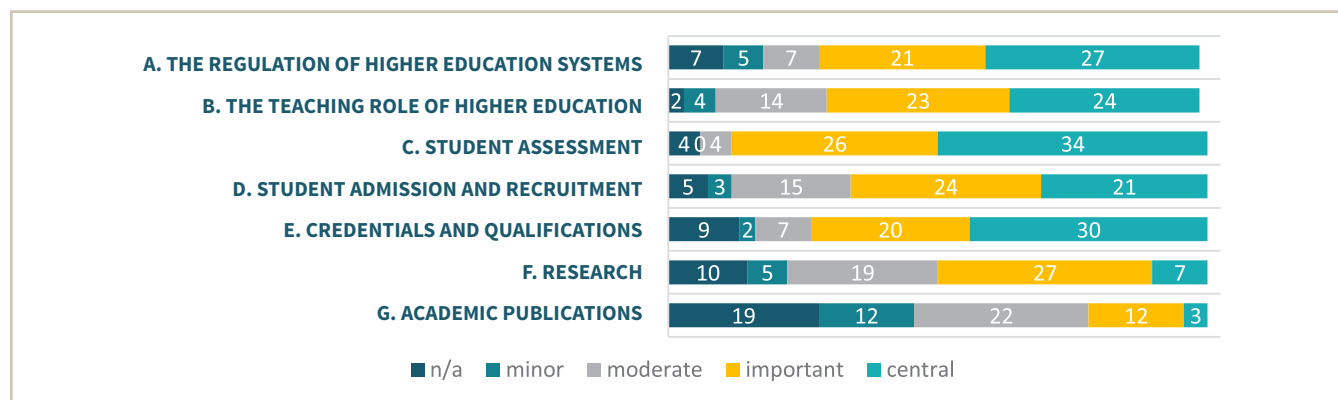
Figure 4: How interested is your organisation in these categories? (Question 4 - Number of responses- total 69)

It can be seen from these responses that the remit and interests of the organizations vary considerably, but the great majority of the AQABs expressed a degree of interest in all these areas (ranging from 71 percent to 94 percent of respondents). However, it is notable that the level of interest in research (84 percent) and academic publications (71 percent) was relatively low, and considerably fewer respondents indicated an "important" or "central" interest in these two categories compared to the other five.

3.2.2 Responses about corruption in the regulation of higher education

Respondents were asked: *What is your organization's view about the current situation in different higher education regulatory bodies that are operating in the same domain as your organisation (for example AQABs, local and national government bodies) relating to the following aspects of corruption and academic integrity breaches?* Four examples of corruption in the regulation of higher education were listed, in line with the Advisory Statement (IIEP & CIQG 2016).

Responses to this question are summarized in Figure 5

Just 36 of the 69 participants chose to answer questions on this category of corruption (Figure 5) compared to answers to an earlier question (Figure 4) when 48 respondents said this topic was either important or central to their remit and a further 12 respondents expressed minor or moderate interest.

Regulation of Higher Education
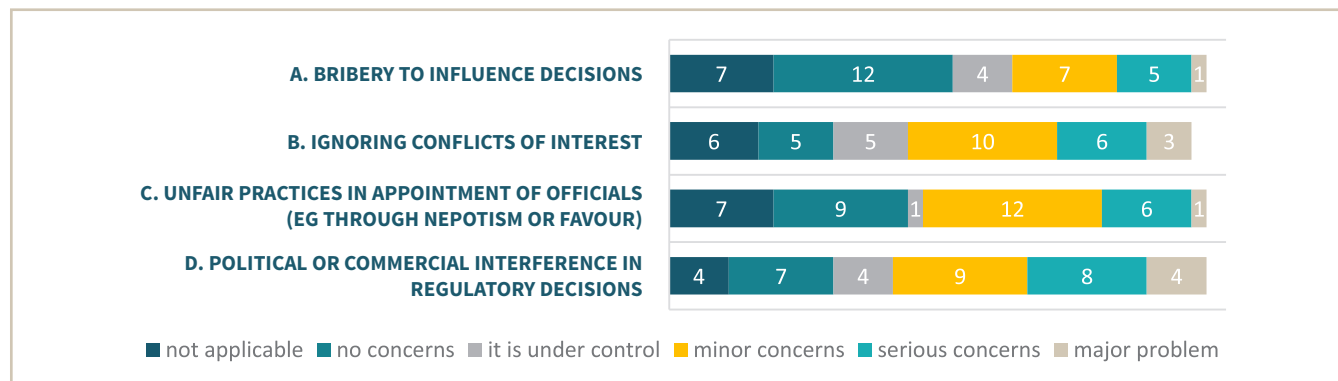
Figure 5: Corruption in the regulation of higher education (Question 7 - Number of responses)

Three AQABs expressed confidence about their organization's operations and other organizations operating in the same region or discipline:

No concerns about other regulatory bodies in our field. Regarding accredited sites, [my organization] maintains policies and standards that deny accreditation to sites that violate the law. [National] regulations require evidence that an accreditation agency does not have the issues listed above.

[My organization] never has had an issue with bribery or conflict of interest. When a conflict of interest arises, the board member or accreditation council member will leave the room during the vote.

The Ministry is responsible for this by law.

The respondents that expressed any concerns (minor or major, 20 respondents in total) represent Africa, Europe, North and Central America, the Middle East and Asia-Pacific. Some of these bodies made reference to the international nature of the accreditation process. For example, one respondent confirmed that their concerns lie in accreditation of *"countries which have not a long tradition of transparency"*. Conversely, another respondent complained of complacency from *"professional accreditation agencies coming over from North America"*.

Additional concerns expressed by the respondents on corruption in the regulatory process include: Lack of transparency; undeclared conflicts of interest in audit panels and institutional governance; failure of audit panels to critically explore corruption in governance of HEIs; corruption in private HE providers and differences in their regulation; unwelcome influences from government on quality assurance; political affiliations influencing appointment of officials; commercialization of HE through privatization; AQABs allowing diploma mills to continue to operate; institutions falsely claiming to be accredited.

Respondents were asked what options would be available to the AQAB if corruption were discovered. The responses are summarized in Figure 6. Based on responses from those who chose to answer this question, it appears that, for most AQABs, some action can be taken to either highlight problems or directly address the issue of concern. Of all the options, "ignoring conflict of interest" was the only one for which no participants selected "no available actions", although eight respondents selected "not applicable". It is notable that 44 of the 69 respondents (64%) expressed no concerns about any of the types of corruption listed under Regulation of HE.
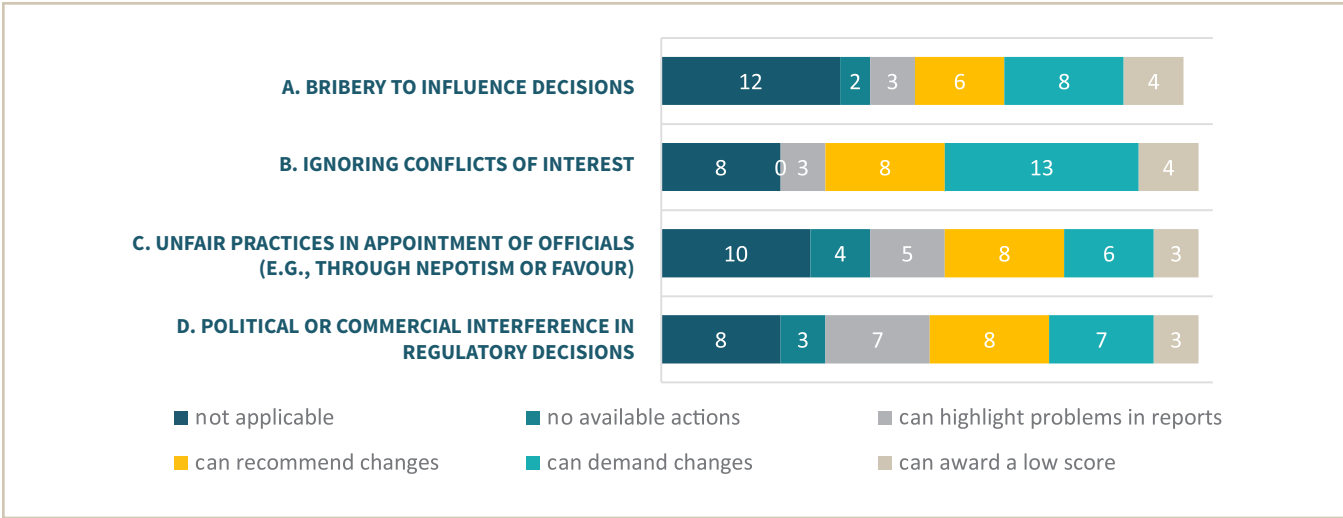
Figure 6: Possible responses to corruption in regulation of HE (Question 8 - Number of responses)

Additional feedback on what other actions are available to AQABs for Regulation of HE includes: the use of probation or loss of license for a non-compliant institution or course; suspension of admission of new students; refusal of registration; provision of specific guidance information to institutions.

Figure 7 summarizes responses on how frequently these types of corruption are encountered by the AQABs. This question was only included on the second (January 2018) version of the questionnaire, which reflects the low number of responses.
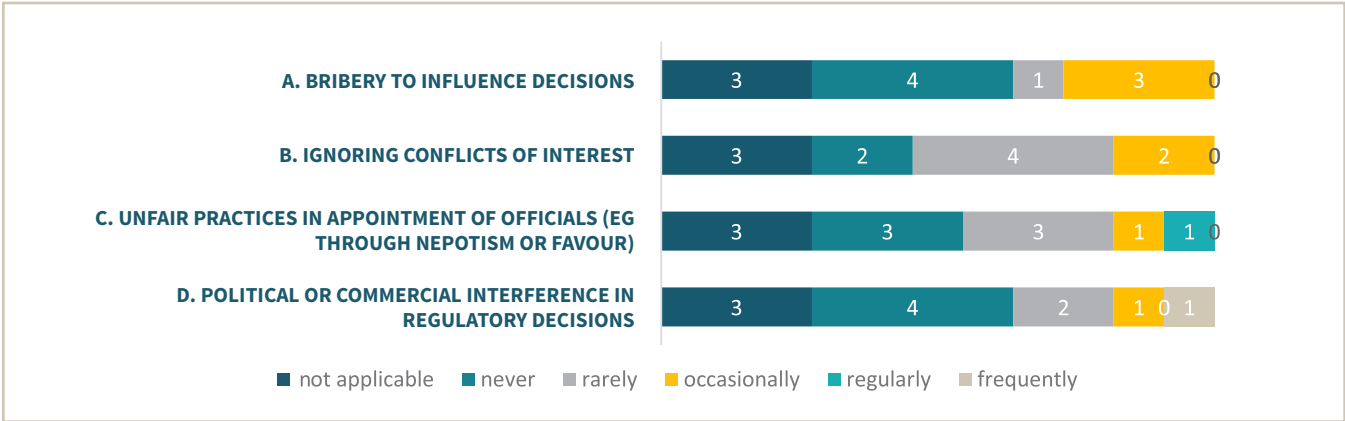
Figure 7: How often are actions of this type observed by your organization? (Question 9 - Number of responses)

Although these data are very limited, these responses imply that AQABs very rarely come across corruption in the regulation of higher education.

Just five AQABs reported that they occasionally come across such activities (South America, South-East Europe, Middle East and southern Africa) and two of the same AQABs (both from countries in south-east Europe) said they regularly or frequently come across unfair practices in appointments and political or commercial interference in decisions.

The literature review (Appendix 5) implies that these practices may be far more widespread than these data suggest.

Additional suggestions by respondents on what should be done to reduce corruption in the regulation of higher education include: transparency in all aspects, including appointment of officials and publication of reports; regulatory bodies respecting an integrity code; appointment of officials who have integrity and no conflicts of interest; reducing bureaucracy; introduction of an independent authority to receive complaints and appeals arising from the regulatory process; independence of AQABs from governmental influences; restructuring and regulation of the private HE sector. Actual feedback from participants can be found in Appendix 4 – Questions 7-9.

3.2.3 Corruption in the Teaching Role in Higher Education

Questions about the teaching role listed six different examples of corruption. Just 35 of the 69 respondents chose to answer questions on this topic, compared to 48 respondents who said the teaching role was either important or central to their remit and a further 18 that

expressed either minor (4) or moderate (14) interest (Figure 4). Of the 35 respondents between 12 and 15 respondents expressed at least one concern (minor, serious or major) about these forms of corruption.

Teaching Role in Higher Education
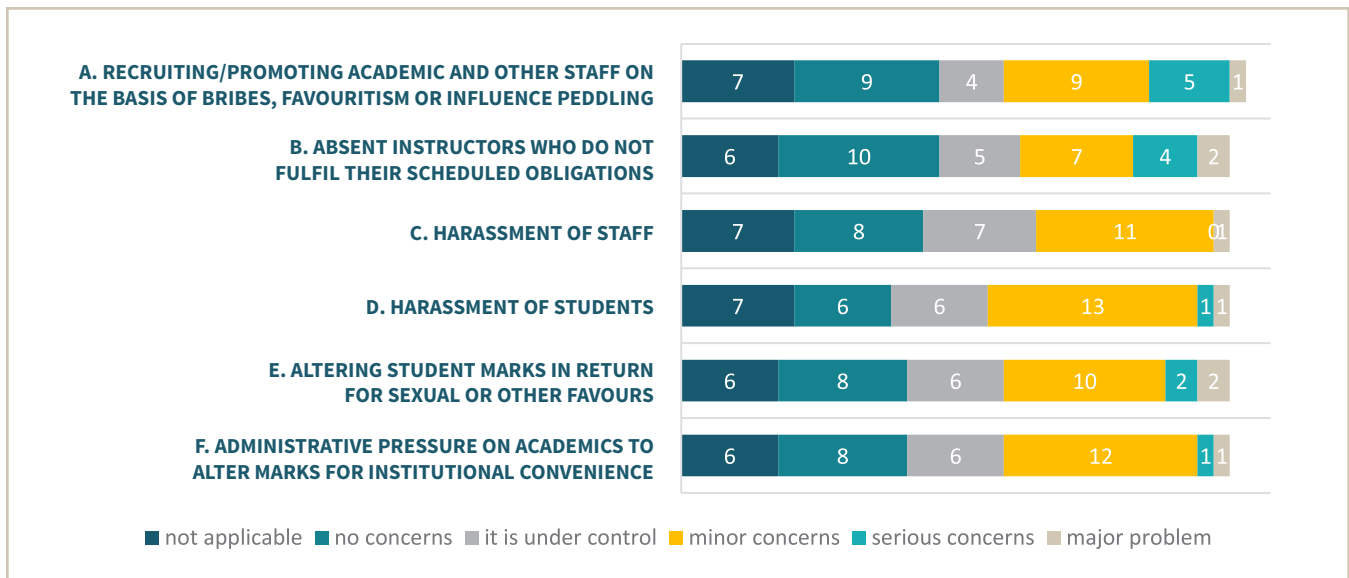
Figure 8: Corruption in Higher Education Teaching (Question 11 - Number of responses)

Figure 8 summarizes responses to this question:

Based on recent evidence from the activities of your organization, what concerns does your organization have about the following aspects of corruption in teaching in higher education institutions under your remit?

For each of the six examples listed for this question over half of the 35 respondents expressed no concerns about these types of corruption (Figure 8). In total 22 AQABs expressed concerns about at least one form of corruption in teaching, representing countries in North and Central America, Asia-Pacific, Europe, the Middle East, Africa and Europe, with five of these 22 AQABs operating internationally.
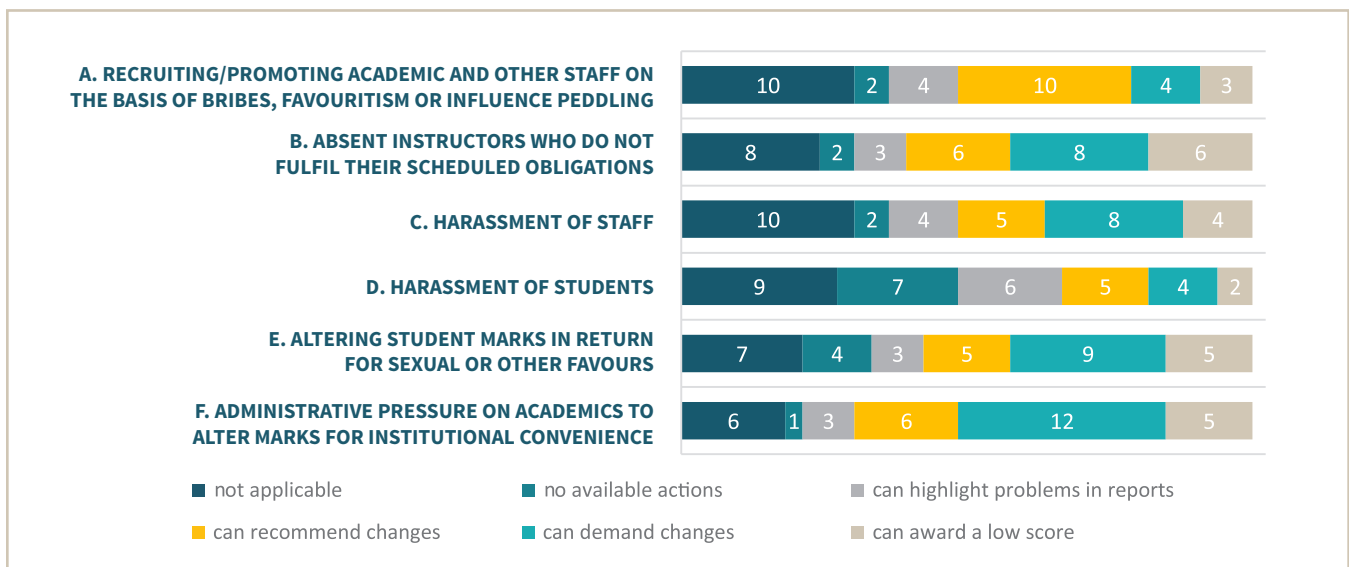
Figure 9: Possible responses to corruption in HE teaching (Question 12 - Number of responses)

In most cases, it appears that there are possible responses AQABs could make if they came across corruption in the teaching role in the course of QA or accreditation activities (Figure 9). Seven respondents said there was no action they could take in response to a case of (d) "harassment of students", and four respondents gave the "no available action" response to option (e) "altering students' marks in return for sexual or other favors".

When asked how often AQABs encounter corruption of these types, the majority of respondents said never or rarely (Figure 10). Those who selected "occasionally" for one or more example cover most parts of the world. The most selected example was "b. Absent instructors …", with 11 respondents out of 35 saying this is encountered occasionally. None of the respondents selected "regularly" or "frequently" for any of the examples.
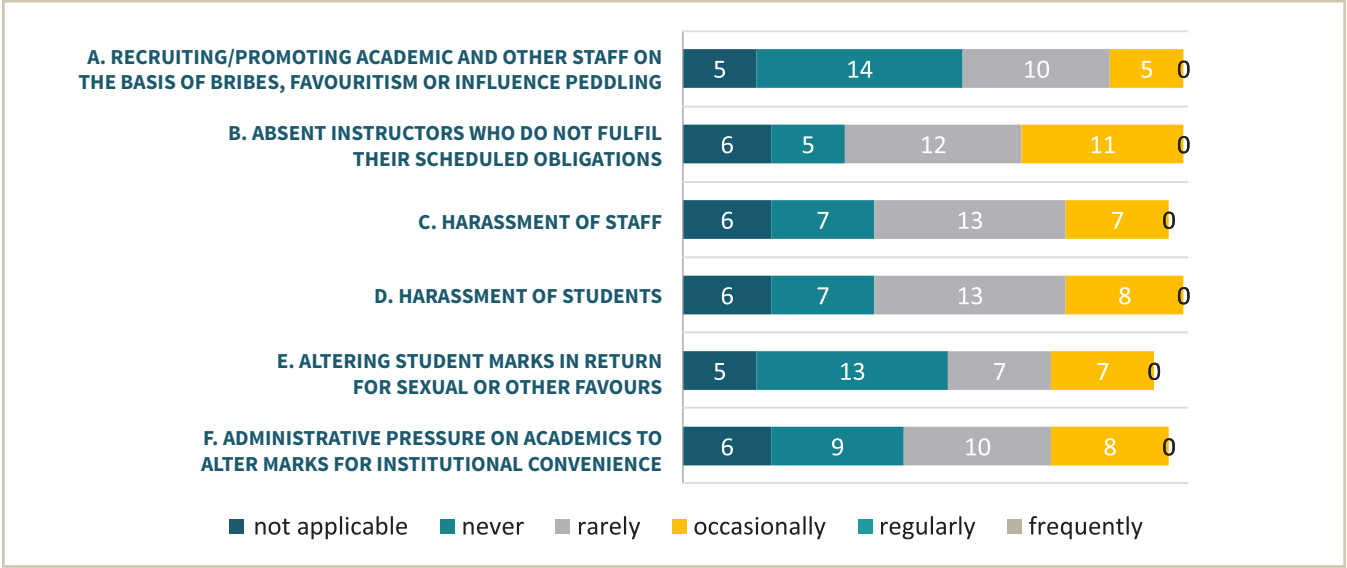
Figure 10: How often are actions of this type observed by your organisation? (Question 13 - Number of responses)

Additional comments from respondents on types of corruption in the teaching role include: pressure on faculty to pass more students, particularly affecting the private sector; management imposing "standardization" on student grades to counter high failure rates; in-breeding – the tendency for institutions to employ their own students.

Feedback and suggestions from respondents on reducing corruption in the teaching role: operate an anonymous complaints system to report cases of corruption; use triangulation by interviewing a range of stakeholders to detect irregularities; publish guidelines and education for staff and students about quality assurance, integrity and safety; AQABs should have a no-tolerance approach to corruption and follow up on actions. To counter inbreeding – although the AQAB can make recommendations to "widen the pool of applicants", only legislation can resolve this problem.

One respondent made clear the view that *"Stories about student harassment in the News are solved by the institutions themselves"*.

Feedback from participants can be found in Appendix 4 – Question 13.

3.2.4 Corruption in Admissions and Recruitment

Five examples of corruption in admissions and recruitment were included in this section of the questionnaire. The participants were asked this question:

What is your organization's level of concern with the following corrupt practices in higher education admissions and recruitment?

Admissions and Recruitment

	not applicable	no concerns	it is under control	minor concerns	serious concerns	major problem
A. EXCEEDING ENROLMENT LIMITS SET BY GOVERNMENTS AND REGULATORY BODIES	16	6	5	5	6	1
B. MISLEADING ADVERTISING FOR RECRUITMENT	3	6	6	14	7	3
C. BRIBERY OF ADMISSIONS STAFF OR RECRUITMENT AGENTS	13	14	4	5	3	0
D. FALSIFIED TRANSCRIPTS AND/OR FAKE RECOMMENDATION LETTERS	7	6	5	14	6	1
E. CHEATING IN ADMISSIONS TESTS	11	7	3	12	6	0

Figure 11: Corruption in admissions and recruitment (Question 15 - Number of responses)

Compared to 45 participants (Figure 4) who identified this category as either important or central to their remit, with a further 18 selecting minor (3) or moderate (15) interest for their AQAB, only 39 respondents chose to answer these questions (Figure 11). Of these 39 respondents, 32 expressed some concern for at least one of these types of corruption.

Although example (a) exceeding enrolment quotas was seen as problematic (5 minor, 6 serious and 1 major) by 12 AQABs (Americas, Europe, Central Africa, the Middle East, South-East Asia), the majority of respondents expressed no concerns about this.

Misleading advertising attracted the most (24) expressions of concern (14 minor, 7 serious and 3 major: Middle-East, South-East Asia, North America, Central Africa and parts of Europe); at least seven AQABs that selected this option operate internationally. Corruption involving recruitment staff and agents was selected by only eight respondents (5 minor and 3 serious). Falsified admissions documentation was of concern to 21 respondents (14 minor, 6 serious and 1 major). Cheating on admissions tests was selected by 18 respondents (12 minor and 6 serious).

Once again, the questions on misleading advertising generated the most interest when respondents were asked about possible responses to such incidents (Figure 12), with 10 respondents selecting "recommend changes", 16 "demand changes", two "highlight problems in reports" and four "award low score". Only two respondents selected "no available actions" and six selected not applicable.

Additional comments about other types of corruption in admissions included "Plagiarism" and "Accepting students that do not meet admission requirements". One specific respondent was concerned about falsification of documentation by international students and agents to secure admission.

Figure 12: Possible responses to corruption in admissions and recruitment (Question 16 - Number of responses)

Additional feedback on available measures against corruption in admissions and recruitment included indications that other bodies, (such as ENIC-NARIC or "the Ministry" and HEIs) have responsibility for handling these types of corruption. One agency is responsible for administering a centralized national application system, which, it says, put an end to corruption in admissions. Six respondents described their agency's operational practices for either guiding or sanctioning providers against corrupt or irresponsible activities, such as over-recruiting, misleading applicants or "falsifying TOEFL [English language test] scores". Suggestions for improving the monitoring of HE providers were to "subject the regulatory bodies to external reviews" and for the Ministry to create "an inspectorate and … independent student ombudsman". Full responses are listed in Appendix 4 - Question 16.
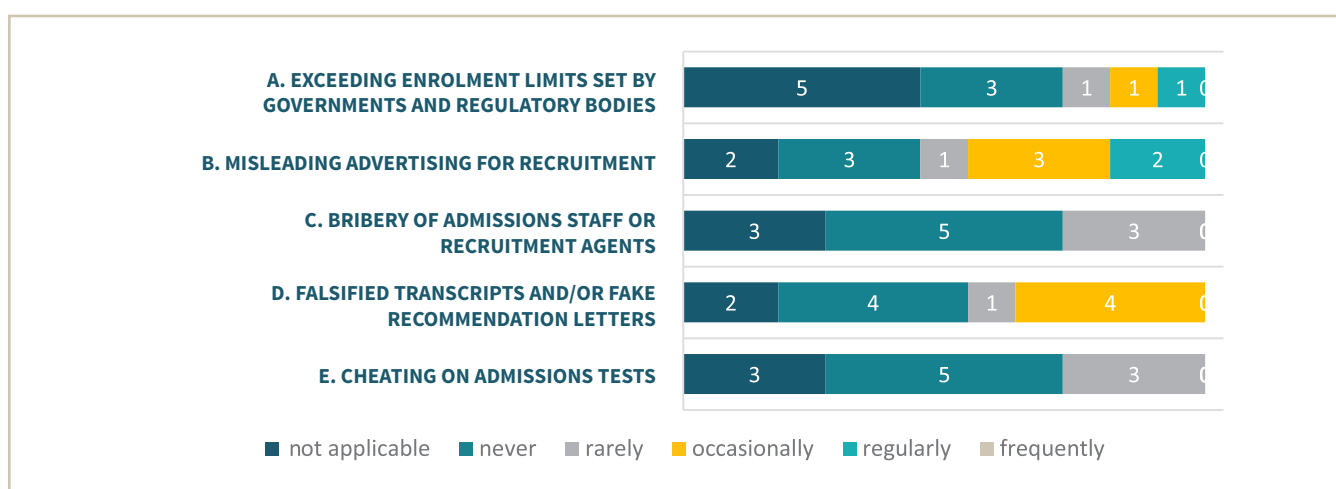
Figure 13: How often are actions of this type observed by your organization? (Question 17 - Number of responses)

(Please note there is limited data available for question 17, because this question wording was only included in the second (January 2018) version of the questionnaire.)

When asked how often corruption in admissions and recruitment is observed by AQABs, respondents said (Figure 13) they come across: (a) exceeding enrolment limits set by government and regulatory bodies: never (3), rarely (1), occasionally (1) and regularly (1); (b) misleading advertising for recruitment: never (3), rarely (1), occasionally (3), regularly (2); (c) bribery of admissions staff or recruitment agents: never (5), rarely (3); (d) falsified transcripts and/or fake recommendation letters: occasionally (4), never (3); (e) cheating in admission tests: never (5), rarely (3). None of the respondents said they "frequently" saw any of these examples.

3.2.5 Corruption in Student Assessment

This part of the questionnaire attracted the most interest, with 41 of the 69 participants opting to complete the questions on corruption in assessment. However, in response to an earlier question, 60 participants said that assessment was either important (26) or central (34) to their operations, with a further four participants expressing moderate interest (Figure 4).

The first question asked in this section was:

What level of concern does your organization have with each of the following aspects of corruption relating to student assessment in higher education institutions?

Student Assessment
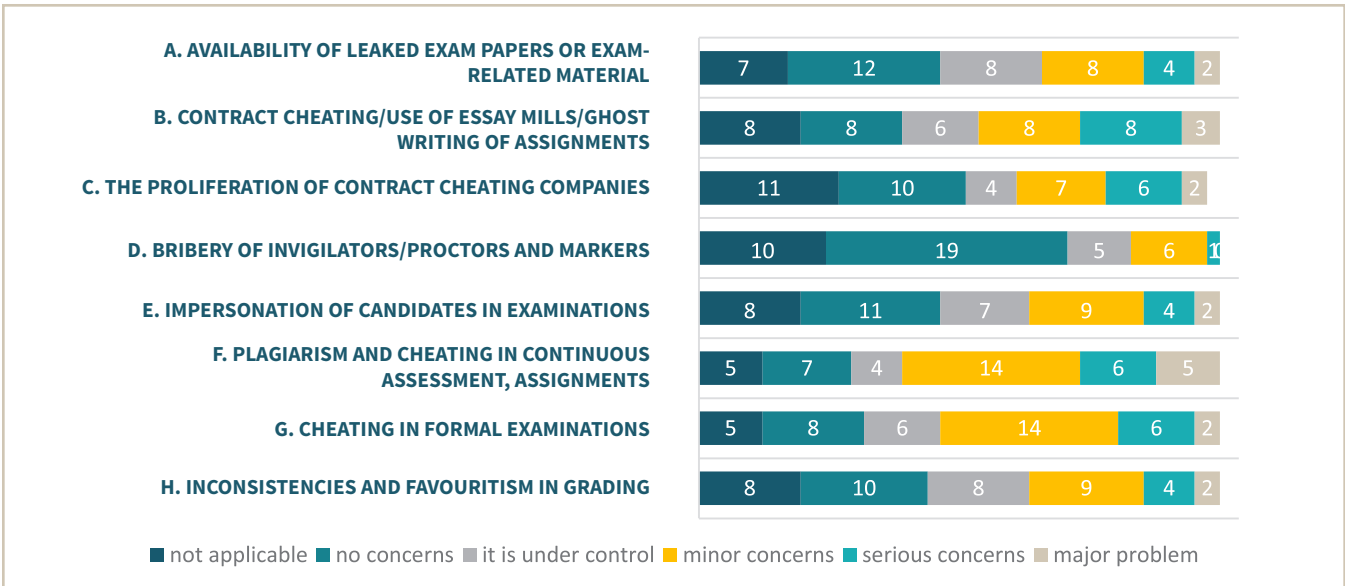
Figure 14: Corruption in Student Assessment (Question 19 - Number of responses)

The questionnaire responses are summarized in Figure 14. Of these eight examples of corruption, the most concerns were expressed about plagiarism (25), exam cheating (22), then essay mills/contract cheating (19) proliferation of contract cheating companies, impersonation and unfair grading practices each had 15 responses; leaked exam papers had 14 responses and the least popular choice, *bribery of examiners and officiating staff*, was selected by seven respondents. However, with the exception of plagiarism (39%) and exam cheating (43%), well over half those who chose to respond had no concerns about these types of corruption in assessment.

The 26 AQABs that expressed concerns about corruption in assessment were from North, Central and South America, Australasia, Europe, the Middle East, Central Africa, South East Asia, and six AQABs that are operating internationally.

In response to the related question *"What kinds of measures or actions are open to you to try to bring about positive change relating to student assessment in higher education?"* (Figure 15), up to 33 of the 41 respondents indicated they had some course of action they could follow to either highlight the problem, recommend or demand changes or award a low score. "Recommending changes" was the most common action selected for all examples in the question.

Ranking the absent or negative replies about what responses or measures are available, almost 49 percent

(20) of the 41 respondents to this question had nothing to say about (c) the proliferation of contract cheating companies, although we know from research that this is a serious global problem; 41percent did not respond about measures to address example (d), bribery of invigilators/proctors, markers, responses to leaked exams; almost 37% of respondents suggested no measures to counter example (b), incidents of contract cheating/essay mills/ghost writers; 34 percent had nothing to contribute about (e), impersonation.

If we take the survey as a whole, of the 69 respondents, well over 50 percent of respondents had nothing to contribute about any of these types of corruption, with almost 70 percent not responding to the question about the proliferation of ghost writing, essay mills or contract cheating companies.
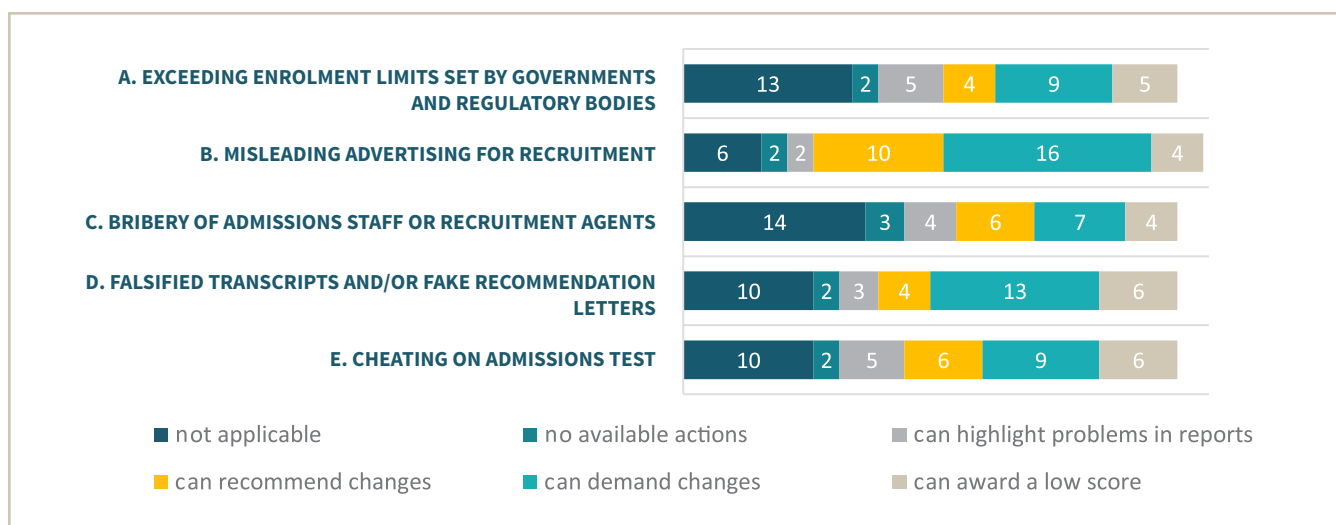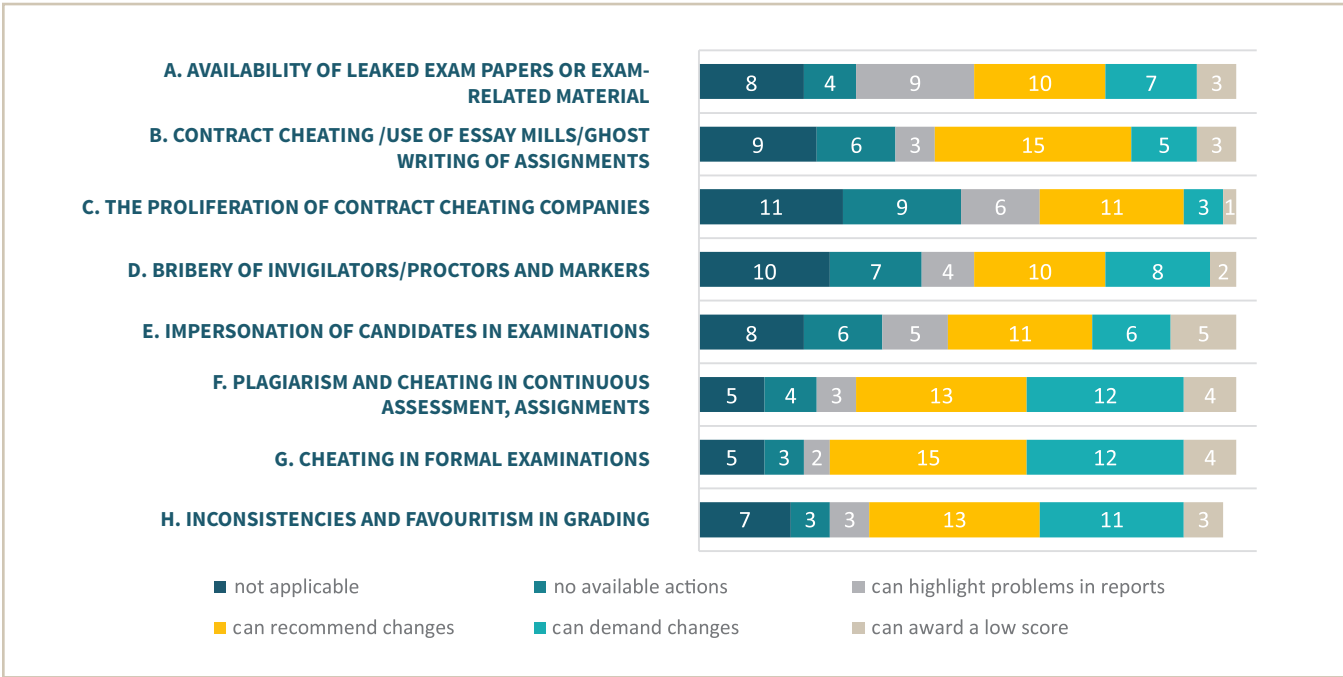

Figure 15: Possible responses to corruption in assessment (Question 20 - Number of responses)

Additional feedback on measures available to AQABs to respond to corruption in student assessment included the guidance notes mentioned earlier from QAA and TEQSA and the legislation enacted by New Zealand to counter contract cheating. One agency indicated the difficulty in identifying any "corrupt actions" in the course of institutional audits, given the limited evidence available to them. A grievance/complaint policy was part of the standards established for nursing students.

A specific action available to one agency to respond to student plagiarism was to issue recommendations in a publicly available report, "delivered to the minister", with the requirement for a response by the HE provider. A further example of an action taken by a respondent concerned the security of the venue for distance learning examinations. Appendix 4 – Question 20 contains details of the responses.

When asked, "How often actions of this type are seen in the course of the work of your organization?" very few respondents said any of these types of corruption were "regularly" or "frequently" found in the course of the AQAB activities (Figure 16, counting vertically down right side = 0, 2,2,0,0,5,2,2 responses). A substantial number of participants selected either "never" or "not applicable" for all eight examples (20, 25, 28, 29, 21, 12, 15, 17 responses: Figure 16).
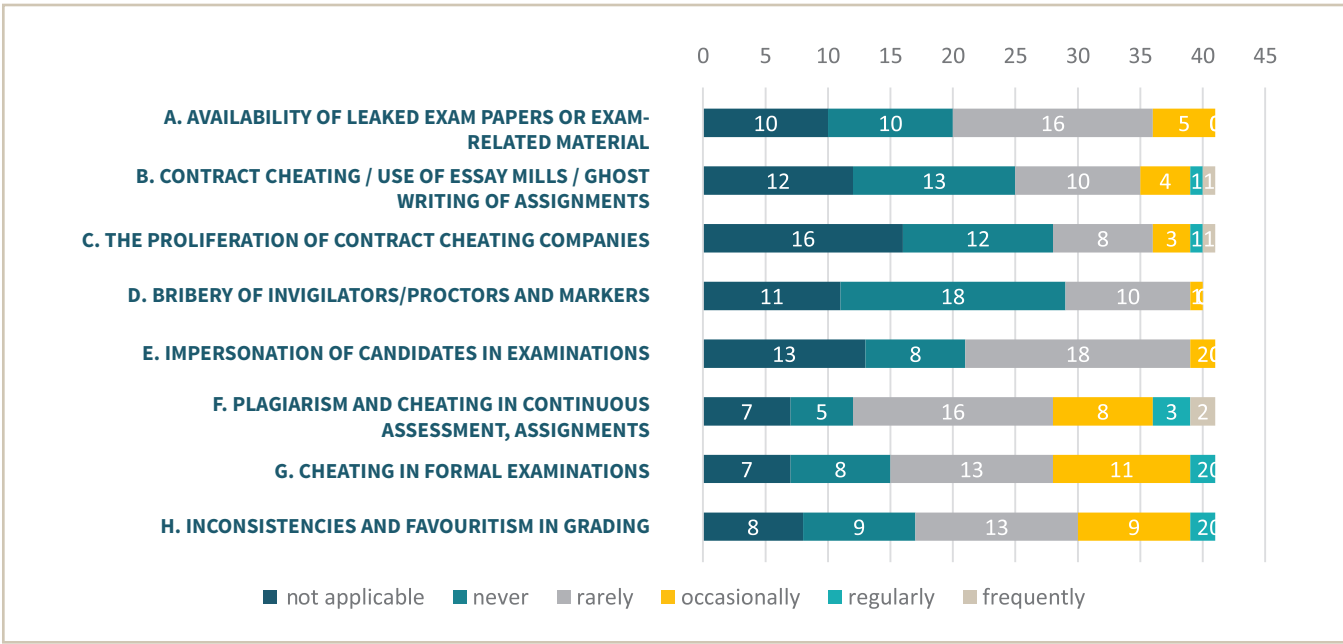
Figure 16: How often are actions of this type observed by your organization? (Question 21 - Number of responses)

The examples with most contributions, taking into account all three elements of this set of questions, are (f) plagiarism, (g) cheating in examinations and (h) Inconsistences in grading (Figure 16).

Further comments about addressing corruption in assessments:

One AQAB operating in south-east Europe explained that *"cheating is seen as culturally acceptable, however, institutions are taking strong measures to combat it. … Inconsistencies in grading are a major concern and a topic in the next accreditation cycle as institutions need to introduce mechanisms to improve consistency of grading"*. The same respondent added that bribery in student assessment had been tackled through police actions, which appeared to have been effective.

Two respondents expressed concerns about contract cheating and suggested actions:

> *"Suppliers of contract cheating materials operate without regard to borders, and solutions must do the same. National governments can play a central role in helping to co-ordinate and support such international efforts".*

> *"A number of commercial assignment-writing companies have appeared and detecting such practices will be a concern in the next accreditation cycle".*

Three respondents described what polices and regulations the institutions they accredit must have in place, such as identifying candidates, security of examinations, handling plagiarism and fraud, and ensuring fairness and justice. They said that these policies must be documented. All three agencies expressed confidence that the incidence of cheating was low and the accredited institutions were managing the situations well.

Appendix 4 – Question 21 contains a list of these additional responses about measures to reduce corruption in student assessment.

3.2.6 Corruption in Credentials and Qualifications

Of the 69 respondents, 40 elected to answer questions in the section on corruption in credentials and qualifications (Figure 17). This compares with 59 respondents who said this category was of central importance (30), important (20), or of moderate (7) or minor (2) interest to their organization (Figure 4).

Of the 40 respondents, 23 expressed concerns (7 minor, 13 serious, 3 major) about degree mills and accreditation mills, and the remaining 17 respondents either believed the problem was under control (3) or had no concerns (14).

Credentials and Qualifications

	not applicable	no concerns	it is under control	minor concerns	serious concerns	major problem
A. USE OF DEGREE MILLS AND ACCREDITATION MILLS	8	6	3	7	13	3
B. FALSIFICATION OF TRANSCRIPTS AND DEGREE CERTIFICATES	7	5	6	8	11	3
C. FALSE STATEMENTS ABOUT QUALIFICATIONS ON CVs AND JOB APPLICATIONS	11	5	3	12	8	1
D. POLITICAL PRESSURES ON HEIs TO AWARD ACADEMIC DEGREES TO PUBLIC FIGURES	14	19	2	2	3	0
E. POLITICAL PRESSURES ON HEIs TO AWARD HONORARY DEGREES TO PUBLIC FIGURES	15	20	1	4	0	

Figure 17: Corruption in credentials and qualifications (Question 23 - Number of responses)

A similar pattern of responses resulted for example b, Falsification of transcripts and certificates, with 22 respondents expressing concerns (8 minor, 11 serious and 3 major), with six respondents opting for "it is under control" and the remaining 12 expressing no concerns.

A total of 24 respondents expressing concerns about either or both of examples a and b were representing AQABs in most parts of the world, some operating internationally (North, Central and Southern America, Europe, South East Asia, Africa, the Middle East, Australasia).

The responses to example c, about falsifying qualifications on job applications, showed slightly fewer concerns, (12 minor, 8 serious and one major), with three opting for "it is under control" and the remaining 16 expressing no concerns. The geographical spread of responses is similar to that for the first two examples.

The final two examples, concerning political pressures to award either academic or honorary degrees to public figures, showed very few expressions of concern from participants. Five responses to the question about academic degrees indicated concerns (2 minor, 3 serious) and four respondents expressed minor concerns about pressures to award honorary degrees. Geographically, respondents with concerns about pressure to award degrees were representing North, Central and South America (2), South-East Asia (1), International operations (2).

Additional types of corruption raised by participants were "visa mills", HE providers offering unauthorized courses, cases where the "transcript/degree is falsified by education provider" and "Students sending their (fake) diploma for advice".
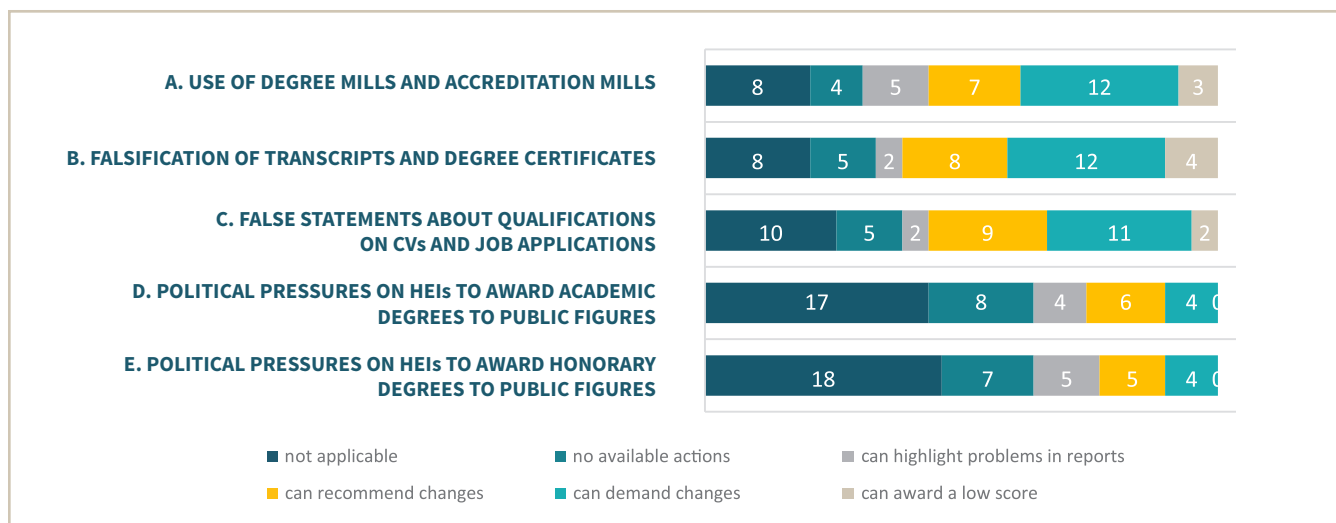
Figure 18: Possible responses to corruption in credentials and qualifications (Question 24 - Number of responses)

When asked about actions available to AQABs against the five examples of corruption in higher education credentials and qualifications, for the first three examples, AQABs responded about a range of measures they can take against incidents of false credentials and qualifications (27, 26, 24, Figure 18), with a small minority selecting "No available actions" (4, 5, 5, Figure 18) or "not applicable". However, only 14 respondents suggested any measures that they could use to address the last two examples of corruption or political pressures to award degrees to public figures.

Additional responses about available measures to counter corruption in credentials and qualifications include the call for training in identifying fake diplomas. One agency said they "pursue companies offering these services"

where possible, and a second AQAB said that they "report any irregularities to the … government".

Two respondents said that corruption in credentials is not part of their remit:

> "The ENIC/NARIC office … regularly checks the validity of credentials and issues information on degree and accreditation mills when they appear";

> "These kind of conducts must be regulated and watched by educational authorities".

A list of the additional responses on corruption in credentials and qualifications can be found in Appendix 4 – Question 24.

Figure 19: How often are actions of this type observed by your organization? (Question 25 - Number of responses)

The majority of respondents (25/37) reported that they "never" or "rarely" came across degree and accreditation mills, falsification of transcripts and degree certificates, or false statements on CVs (or that these were not applicable to their organization). The proportion of AQABs who said they came across these types of corruption on an occasional or regular basis was about a third of respondents (e.g., 13/37 for use of degree and accreditation mills).

An even smaller number of respondents – only two out of 39 - said they came across *political pressure on HEIs to award academic or honorary degrees.*

None of the respondents said they "frequently" saw any of the listed examples.

3.2.7 Corruption in Research and Publication

In response to an earlier question summarized in Figure 4, 58 (84%) respondents to the survey expressed some interest in research and 49 (71%) said they had interest in academic publications. However, this section had the lowest response rate of the six categories, with a maximum of 18 active respondents (after discounting those who consistently selected "not applicable").

Additional feedback from one participant explained that [my country] *"has a separate National Research Council*

that deals with this", confirming that some countries allocate responsibility for these elements to separate bodies rather to the AQABs. This strategy makes sense considering the number of research-only institutes not involved with undergraduate or master's level education. However research and publication is a central activity in almost every higher education institution, and any corruption in these areas can have serious implications for the overall quality of the education that the institution provides.

Research and Publication
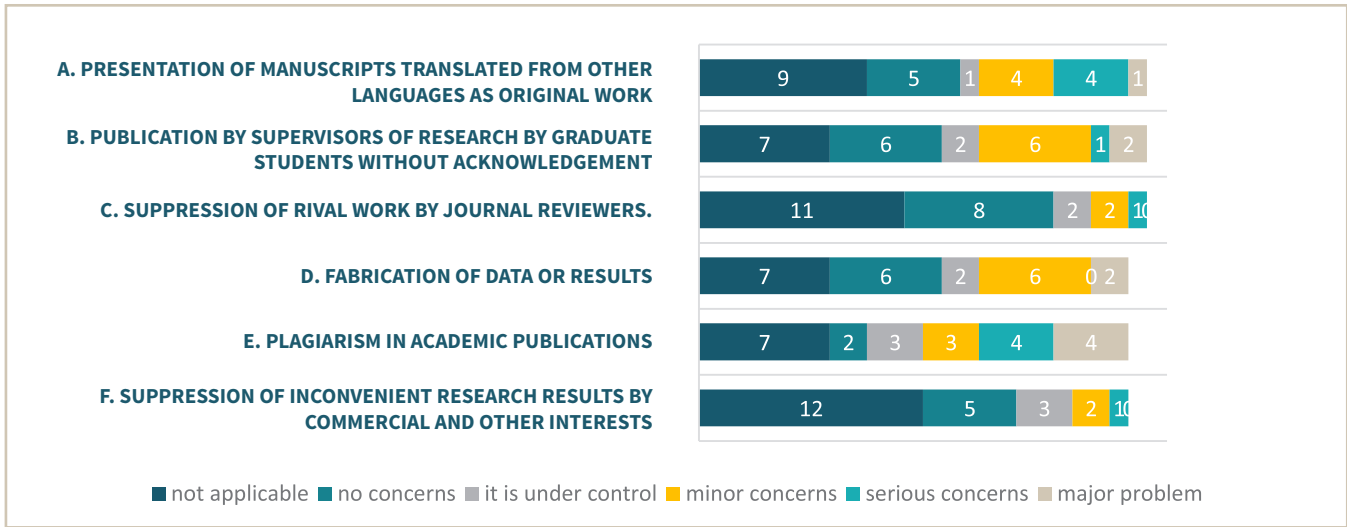
Figure 20: Corruption in research and publication (Question 27 - Number of responses)

The responses to the initial question in this set: *"What level of concern does your organization have about each of the following aspects of corruption in academic research and publication?"* are summarized in Figure 20.

In response to (a) presentation of translated manuscripts, nine respondents expressed concerns (4 minor, 4 serious, 1 major). Regarding (b) unfair publishing of students' work by supervisors, nine respondents expressed concerns (6 minor, 1 serious, 2 major). Only three respondents expressed concerns (2 minor, 1 serious) about (c) unfair practice by peer reviewers to suppress work by rivals. There were six minor and two major expressions of concern about (d) fabrication of data or results. Plagiarism in academic publications, (e) drew the most concerns (3 minor, 4 serious and 4 major). The final example (f) suppression of inconvenient results) was only of concern to three respondents (2 minor and 1 serious).

When asked *"What kinds of measures or actions are open to your organization to try to bring about positive change in academic research and publication?"* (Figure 21) 14 respondents selected available actions from the list of options provided, for addressing examples (a), (b) and (e), 11 responses did so for (d) and nine respondents did so for (c) and for (f). The options selected varied according to the nature of the corrupt activity.

When asked how often these types of corruption are encountered in the course of AQAB activities, (e) *plagiarism in academic publications*, was selected most often with 15 respondents (6 rarely, 5 occasionally, 2 regularly and 2 frequently). Geographically these responses encompass the Middle-East, the Americas, South-East Asia, Europe, southern Africa and Australasia.
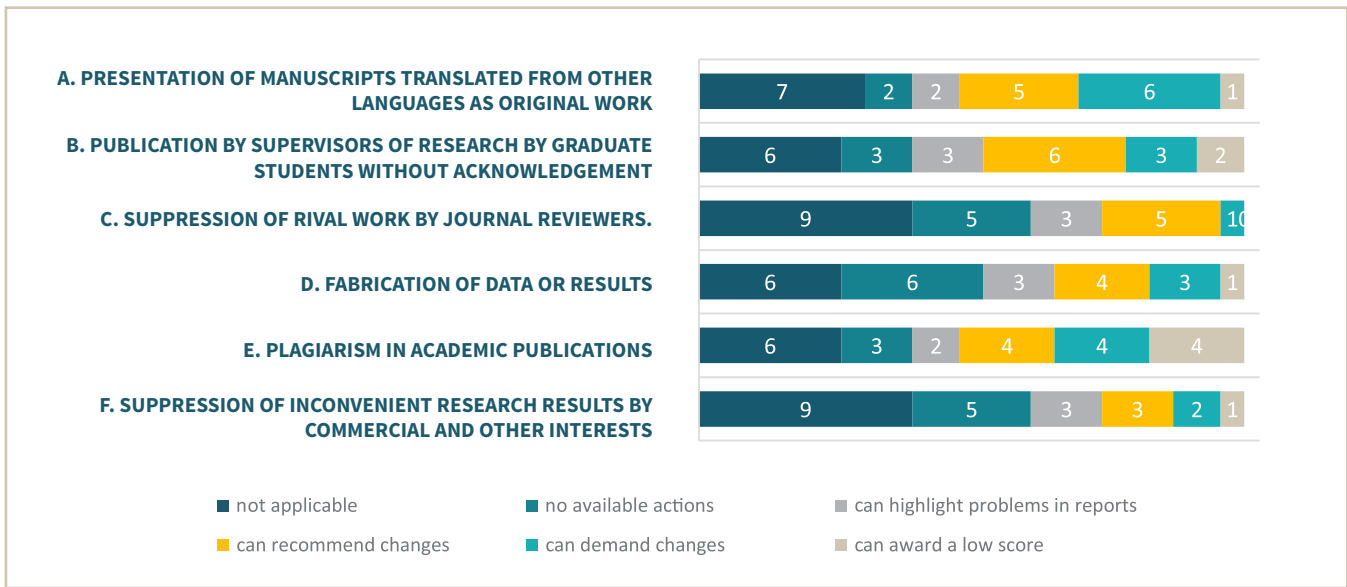
Figure 21: Possible responses to corruption in research and publication (Question 28 - Number of responses)

The other five examples of corruption in research and publication were less commonly encountered by respondents, with subsets of the same 15 respondents selecting different frequencies for observing each type of corruption.

Two respondents provided additional feedback on available measures against corruption in research and publication (Appendix 4 – Question 28). The first

agency *"coordinates the national Ethic Committee and the umbrella/second instance body for such cases"*. The second respondent expressed awareness of the types of corruption stated in these questions and noted the need for *"tough punishments if it is detected"*. In the second case, the respondent said that their organization has specific responsibility for misconduct and corruption in research and academic publications.
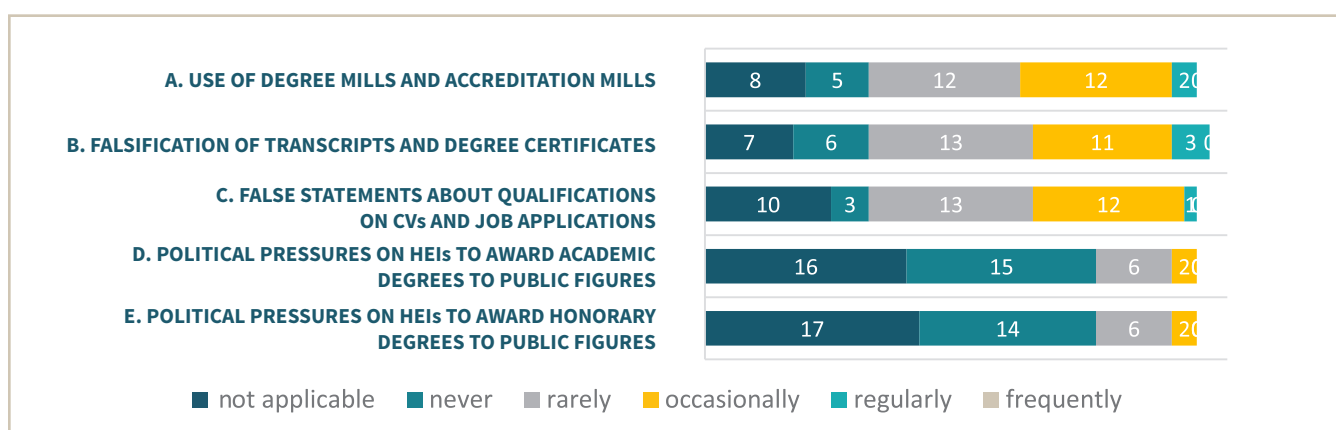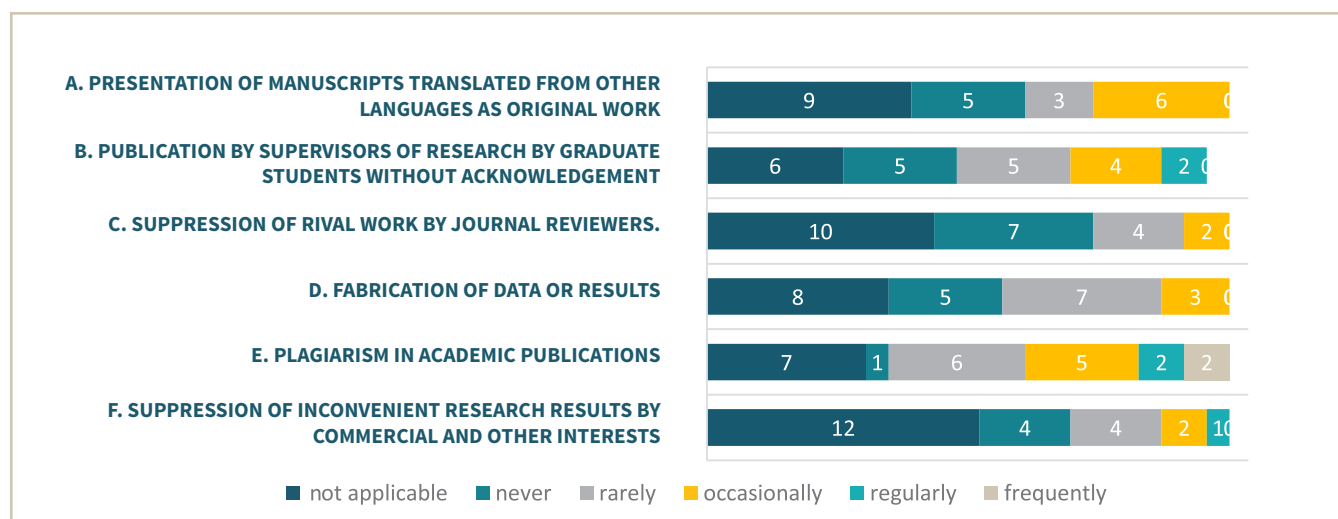
Figure 22: How often are actions of this type observed by your organization? (Question 29 - Number of responses)

Although the number of respondents was much lower for this section than for the other five categories of corruption, it is clear that a small number of AQABs in different parts of the world are coming across corrupt activities in research and publication in the course of their operations and, to some extent, there are responses they can use to at least highlight the problems. However, the low number of responses for this category raises questions about what oversight there is for research and publication in some parts of the world if the majority of AQABs do not see regulation of this area as part of their responsibility. The quotation about the separate body for research integrity provides part of the answer.

3.2.8 General feedback from participants

The final part of the questionnaire had some general questions for participants in order to capture their overall thoughts and suggestions. The first of these questions was designed to explore how often the AQABs took different measures against corruption they encountered in the course of their operational activities. The responses indicated (Figure 23) that the most common course of action is to "highlight problems in communications or reports" (3 frequently, 8 regularly, 8 occasionally and 12 rarely). "Recommending changes" was the second most selected option (3 frequently, 11 regularly, 5 occasionally and 8 rarely).

"The ability to demand changes" is used frequently by four respondents and regularly by six AQABs, with a further six selecting occasional use and five saying they use this "rarely". The use of a low accreditation score was selected by 18 respondents (5 frequently, 4 regularly, 5 occasionally and 4 rarely). Refusal of a license to operate is an option available to considerably fewer AQABs, with just eight respondents selecting this (1 frequently, 1 regularly, 4 occasionally, 2 rarely).
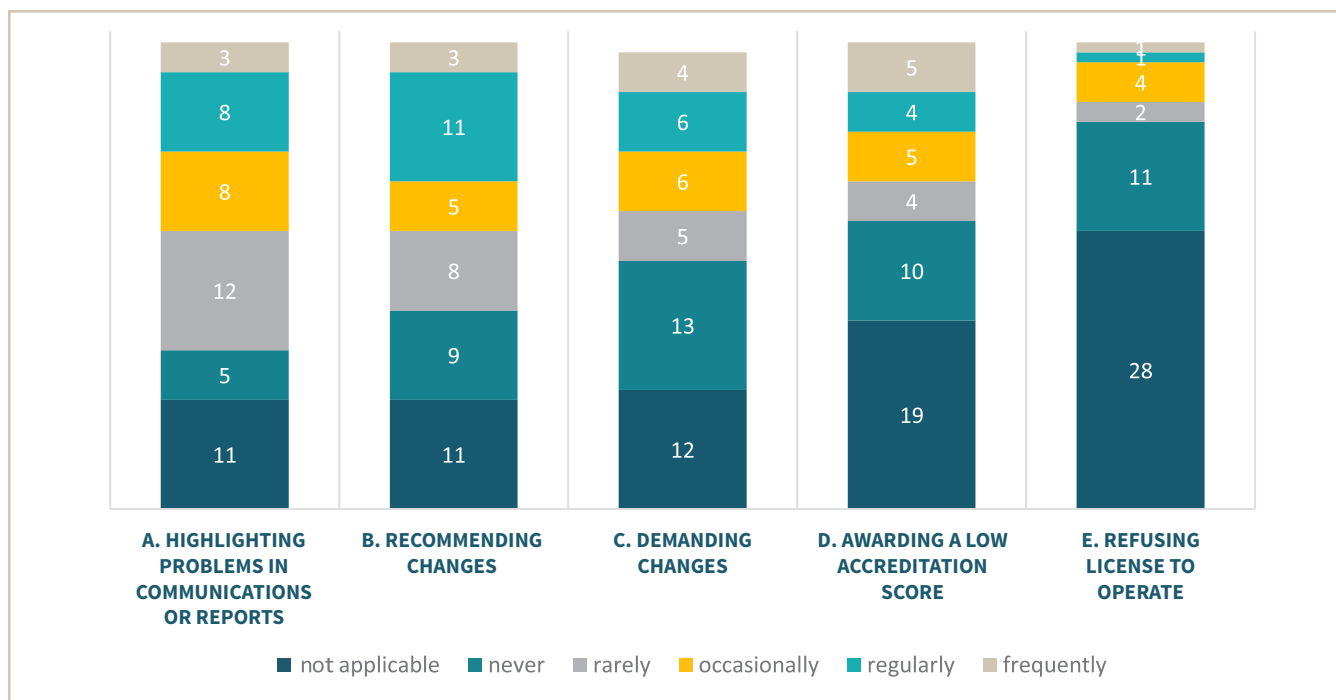
Figure 23: How frequently have actions of this type been taken by your organization? (Questions 9 (V1) and 30 (V2) - Combined number of responses)

Figure 24 summarises responses to the general question "What is being done or planned to address corruption and breaches to academic integrity?" The responses (Figure 24) indicated that respondents are "planning to" or "in the process of" addressing corruption and breaches of academic integrity by *developing new standards* (25) and *developing new policies* (25). Some others stated that they are *consulting with other organizations* (23); *developing guidance for HE providers* (20) and *consulting with HE providers* (20). Some also stated that they are planning to implement other measures (7).

What is being done or planned to address corruption
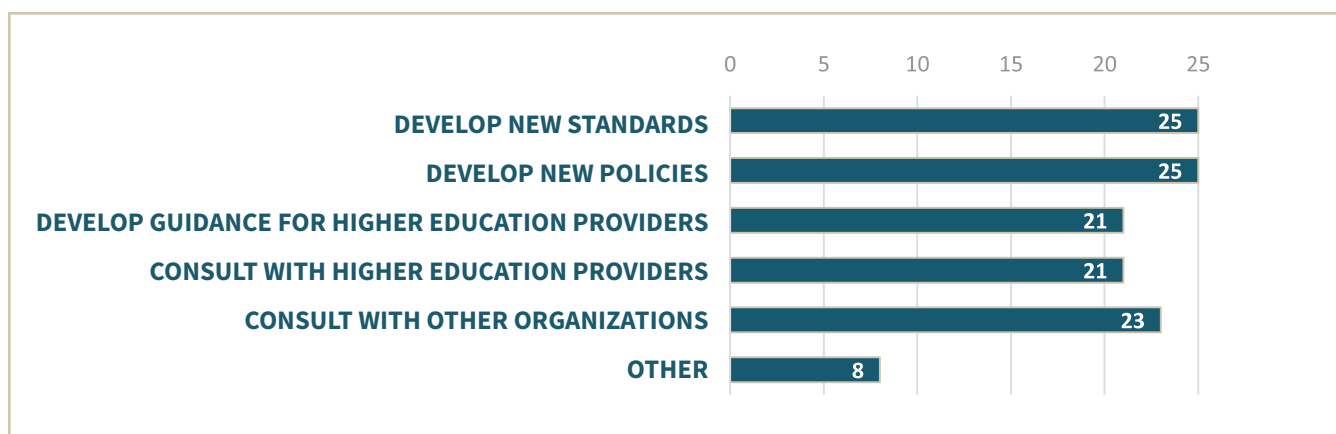
Figure 24: AQAB responses to corruption and academic integrity breaches (Questions 30 (V1) and 31 (V2) - Combined number of responses)

General feedback from respondents on available measures for addressing corruption and poor practice includes

- The production by the European Quality Assurance Register (EQAR) of an openly available "white list" of results from external quality assurance agencies to "promote transparency and trust";
- Continuous improvement, regular revision, updating and strengthening of AQAB guidance, standards and monitoring activities *"to respond to the changing educational environment"*;
- Application of strong penalties and standards;
- Training, sensitization and advocacy;
- Communicating and sharing information with other AQABs and regulatory bodies globally.

Suggestions for other activities and measures:

- Conducting unannounced on-site investigations
- More legal protection for AQABs to counter legal challenges
- Monitoring and responding: *"when a particular issue becomes a pattern or rises to the level of*

a theme (plagiarism among certain groups of students, evidence that a school is a "visa mill")" take appropriate action".

- Develop new legislation *"that will make public both institutions and individuals who misrepresent their qualifications or have fraudulent qualifications".*
- Continuous improvement of education standards and operational policies of accreditation agencies.
- Introduce plagiarism-checking software to all institutions, publish all theses online and introduce other legislative changes which will discourage corruption.
- Quality assurance agencies should establish systems to counter academic corruption.
- Public databases of certified degree diploma and of certified institutions
- This has not been an issue with our agency, so there are no actions we are currently contemplating.
- The types of corruption identified in this survey are not an issue with the programs that we accredit.
- Corruption and integrity breaches [have] never [been] noted.
- National legislation should address this issue.

What is your organization's view on the overall situation relating to corruption in higher education in your part of the world?
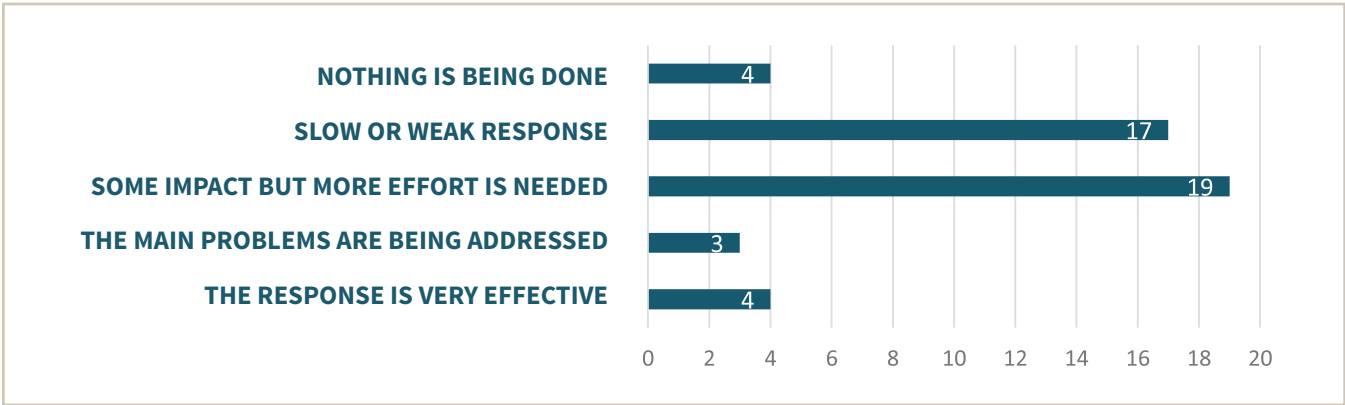
Figure 25: Views from AQABs on responses to corruption in H.E. (Questions 31 (V1) and 32 (V2) - Combined number of responses)

AQABs often work in conjunction with other organisations to make informed decisions on policies and proactive initiatives. A question in the survey asked participants which organizations they work with in fighting corruption. Responses are summarized below.

- Universities, professional staff and academics
- University senates, councils
- Education Bureau
- Other AQABs
- European networks: ENQA, EQAR, ENAEE, ENIC-NARICs
- Licensing and regulatory bodies
- Ombudsmen/women
- Anti-corruption agencies/commissions
- (New Zealand) Qualifications Authority, Tertiary Education Commission
- (U.S.) Department of Education
- (UK) National Union of Students
- (UK) Universities UK, Guild HE, HEFCE / OfS (Office for Students)

- Government, government ministry of education and scientific research
- Courts
- Media
- CHEA

Remaining concerns and observations from questionnaire respondents

- EQAR: establish sources of information about misconduct of member agencies.
- Provision of lists of fake accreditation agencies and bogus institutions.
- To reduce corruption in research: "Scientific research needs to be funded by entities without a financial stake in the results".
- The challenge of reducing corruption should begin in primary and secondary schools.
- Inbreeding: universities are hiring their own graduates who then spend their whole career at a single institution.
- Improve citation practices by faculty / academics.

3.3 Analysis of Interview data

The interview participants were selected for several different reasons:

- to enhance the available evidence about specific categories of corruption;
- to add to evidence about a specific geographical region;
- to provide additional viewpoints about causes of corruption and possible ways forward; and
- to explore interesting approaches and good practice examples.

The team would like to have interviewed many more people in addition to those included in this report. In some cases, no response was received to requests for an interview. In other cases, the people were willing to be interviewed and some that had been identified were not contacted, unfortunately, because of time limitations.

Although some interviewees represented AQABs or regulatory bodies, many of those interviewed had other roles and specialisms that related either to the fight against corruption or to quality in education and research

(see Appendix 2 for a summary of interviewees).

Some of the interview data has been included in this report, but other details will be used in separately prepared case studies. The interviewees have all approved the inclusion of views and the quotations in this report that have been attributed to them.

The research design was based on six categories where corruption occurs in higher education, as defined in the Advisory Statement (IIEP & CIQG 2016). Thematic analysis of the qualitative data, particularly from the semi-structured interviews, identified the need for further categories: firstly, corruption in the governance of higher education institutions; secondly, networking and cooperation between AQABs and other bodies to address different forms of corruption; and thirdly consideration of different perceptions of integrity, quality and standards. The following analysis of the interview data is organized according to these nine themes, while appreciating the overlaps and commonality between certain categories and themes within them.

3.3.1 Views on responses to corruption in the regulation of higher education

Several interviewees expressed confidence in the work of quality assurance agencies. Sjur Bergan from Council of Europe (CoE) noted that *"my impression is the agencies that are members of EQAR* [European Quality Assurance Register], *generally do very good work, I would trust their assessments"*. However, Bergan also observed that *"you cannot implement the European Standards and Guidelines (ESG) if you are corrupt"* and clarified that it is *"important that the public authorities responsible for the system make it clear that corruption is unacceptable"*.

Douglas Blackstock, CEO of the UK's Quality Assurance Agency (QAA) was confident that *"the QAA auditing process could drill down and find potential problems by talking to students and staff"*, but said there may be *"less opportunities"* for such scrutiny when he was asked about risk-based institutional assessments and perhaps future plans for even lighter-touch institutional audit under the UK's recently established Office for Students (interview January 2018). He suggested that *"what would be preferred is random institutional visits or inspections, to address the gaming of audits by HEIs"*.

The process of quality assurance in Russia is very different from that in the UK. Russian-born researcher Elena Denisova-Schmidt praised the exemplary system, introduced in 2013, of monitoring quality in HEIs in Russia (MICCEDU nd), but she qualified her views by saying *"how does it work in the real life I don't really know, but on paper it is a perfect example"*. Compatriot Andrei Rostovtsev, co-founder of the Dissernet group, was of the opinion that there are corrupt practices such as nepotism, favouritism and undeclared conflicts of interests within the quality assurance audit processes in Russia and also in the centrally organized attestation committees that award doctoral degrees. It was reported that acceptance by some officials of the evidence on corruption generated by Dissernet members is leading to improvements in the appointment process (interview Rostovtsev). Denisova-Schmidt and Rostovtsev agreed that there is clearly still a long way to go.

In 2018 the prestigious European University in St Petersburg (EUSP) was refused a license to admit students by the ministry, with no clear justification provided for taking the action. The same thing happened to EUSP in 2008, then on the grounds of fire safety violations, but this explanation was disputed: *"the obvious reason for its closing had been the state's response to a grant, given to one of the EUSP professors by the European Union for*

studying electoral behavior in Russia. At that time, the crisis was successfully resolved once the EUSP declined the grant" (communications Denisova-Schmidt, Dubrovsky 2017, 190). Although the latest revocation of the license has now been overturned, similar action has been taken against a second reputable institution, the private Moscow School of Social and Economic Sciences. Again, the grounds for taking the action are unclear (interview Rostovtsev).

When asked about how the level of corruption in Russia could be reduced, Rostovtsev said that *"consolidation of the residual expert community"* was an essential means to challenge the status quo. He explained that they have now reached a stage where the Ministry consults with Dissernet when appointing members of an attestation committee: *"The ministry just ask the Dissernet if this or that person could be a member in the next round"* (interview Rostovtsev).

There is very different approach to quality assurance in Lithuania. The Lithuanian Quality Assurance Agency works in conjunction with the Office of the Ombudsman, as explained by the then-head of the agency, Nora Skaburskiene:

> *"what we do about corruption, about academic ethics as well, we do these at the institution review process, when we assess any of the HEIs here in Lithuania, before the visit of the experts we ask the Ombudsman Office to present the documents, the cases… for the institution under review"* … *"if there are recommendations then of course in the visit they ask how it was solved … if it concerns the students matters so they also ask the students".*

However, the ability to detect malpractice and corruption affecting procedures within an institution has been hampered by a recent change to the remit of the Lithuanian Ombudsman's Office, according to the previous ombudsman (2013-2018) Vigilijus Sadauskas, "The Law on Higher Education and Research of the Republic of Lithuania was changed 01/01/2017. By earlier edition the Ombudsman was able to investigate all possible violations of academic ethics and procedures, not only [those] established in the code of ethics. Then most of the violations (about 80%) were regarding procedures". The former ombudsman explained that even after that limitation was introduced, HE providers continued to lobby the Lithuanian parliament to request that the scope be narrowed still further, to focus on students and not

pursue complaints about universities and academics. So far, further changes have not been agreed.

The suspension by EQAR of Kosovo's[2] AQAB, KAA, described in the literature review (Limani 2017, ORCA 2017), caused a crisis of confidence in the higher education sector in Kosovo. This swift reaction by the EQAR and the measures now being taken to secure reinstatement by KAA and the Government, indicate how much EQAR registration is valued by AQABs.

Massification of higher education has caused huge problems for quality assurance in India, according to N.V. Varghese. He explained that of 900 universities in India only one-third are currently externally accredited and only one-fifth of approximately 41,000 higher education colleges have accreditation. At present, institutional accreditation is mostly voluntary (it is mandatory only for institutions receiving grants from the University Grants Commission), but Varghese said he thinks it should be compulsory for all HE providers to be accredited. However, to tackle the huge backlog of institutional accreditations would require a significant scaling up of the current operations, ideally with responsibility devolved to state level, while still retaining central oversight (interview Varghese).

There are good prospects that the deficit in institutional accreditation in India will improve in the near future after the University Grants Commission announced the establishment of the Accreditation Advisory Council in August 2018, with responsibility for setting up many more higher education Accreditation and Assessment Agencies (email communications Varghese, The Times of India 2018b).

Varghese explained that the newly introduced National QA Standards Framework changes the weightings for evaluating institutions, putting 70 percent of the weighting on the self-study and quantitative data provided in advance of the panel visit and only 30 percent based on the outcomes from the visit. The previous arrangement weighted the self-study report at 30 percent and 70 percent for the findings from the visit. The decision for the change was based on the perception that institutions were *"too eager to please"* the visiting panel, which could result in misleading outcomes (interview Varghese). However, while this change may improve transparency, Varghese

expressed concerns that the new standards might lead to the loss of *"a good part of this qualitative information about the institution"* collected during the visit.

Interviewees discussed strategies some AQABs use for discouraging corruption, including starting a dialogue with the sector or with the general public by carefully placed information, for example, by presenting ideas and information at academic conferences, calling consultations, and making use of publicity through the media by issuing press releases to spread their messages (as discussed by QAA, TEQSA, Ireland's QQI, Lithuania's QAA and the former ombudsman for Lithuania). However the activities of some AQABs, for example in Russia and India, are normally limited to conducting institution evaluations.

Of course, the main role of AQABs is to monitor internal quality assurance systems and to ensure they are compliant with national or international reference points, frameworks and standards. According to the head of the Lithuanian QAA: *"We ask the institution if they have the internal procedures for academic ethics, for preventing corruption, then of course during the visit the experts ask all concerned: the administration, the lecturers, and of course the students, so how is the situation, how the internal rules are implemented in reality".* By triangulating responses, the agency is able to get a view of how embedded and mature the institutional policies and processes are, and whether they are working as intended. However, the validity of the evidence depends on whether those students, administrators and teachers give frank and honest answers.

A very different picture emerged from Germany during an interview with Berlin-based Debora Weber-Wulff. Education matters are complicated in Germany by the strictly enforced autonomy of the Länder (states), higher education institutions and the rights of individual professors within German universities and colleges. Weber-Wulff, who is part of an academic community of volunteers engaged in documenting cases of plagiarism in academic publications such as PhD dissertations in order to bring about positive change (VroniPlag Wiki, nd), said that, in her experience, the process of institutional accreditation is not always taken very seriously by either the visiting panel members or the institution being audited:

> *"this started about 15 years ago when the German universities decided [they] needed to be accredited. And so, we ended up in Germany with a number of accreditation institutes … what happens is that a group of people come in for two days and they interview everybody and then they put together a report … the reports are sometimes bordering on nonsense"* (interview Weber-Wulff).

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[2] All references to Kosovo, whether the territory, institutions or population, in this text shall be understood in full compliance with United Nations Security Council Resolution 1244 and without prejudice to the status of Kosovo.

It appeared that at least some visiting panel members did not have a clear sense of purpose or protocols in the conduct of the institutional audit, but *"Some of it is good because you do actually pull together all the data and that's something that we don't often normally do in Germany".* However, despite the self-reflection, doubts were expressed whether any longer term impact on quality emerged from such exercises in Germany (Weber-Wulff interview). Recently some institutions in Germany have moved to "self-accreditation" in an attempt to improve the process:

> *" … we hired seven people to collect statistics on our school and to put together a work-flow of how we get*

our new programs put together and how we make changes and stuff like this. They asked questions about how we ensure quality and how we make sure that there's no plagiarism … no discussions about any of these … it's all just checking the boxes that we have and then we get this stamp on our forehead … yes you've been accredited for 5 more years … and everybody's happy" (Weber-Wulff interview).

Although this is just one experience, it is difficult to see how corruption of any kind would be exposed or managed under the accreditation methods described here.

3.3.2. Views on actions against corruption in the governance of higher education institutions

Andrei Rostovtsev explained his view that *"the major difference in the level of corruption, compared to what is happening elsewhere in the world – is the scale. If it is a deviation from the norm elsewhere, in Russia it is rather a norm".* Evidence for this claim is provided though investigations recently conducted by Dissernet into qualifications of university Rectors in Russia. Of 300 dissertations that had been successfully defended within the last 15 years by rectors currently in post, 60 were found by Dissernet to be 100% plagiarized. Having an institutional leader without appropriate credentials was said to impact negatively across the entire institution:

> *"Once such persons are nominated to the university rector position they start to fire lecturers with good reputation and hire people who falsified degrees the same way. By doing that they gain a support in the university"* (interview Rostovtsev).

Clearly such embedded corruption is not easy to challenge.

An impediment to quality and standards in India results from the system of associations between universities and colleges to which they award degrees. Some universities

have as many as 1,200 affiliated colleges, which makes the QA monitoring processes of the universities extremely difficult. Varghese suggested that increasing the number of universities and limiting the number of college affiliations permitted for each university would help to raise standards and discourage corrupt practices (interview Varghese).

The process of appointing higher education teachers in India can itself be a source of corruption. Teachers can be appointed to a permanent post in a university or can be appointed to the "system". The latter appointees provide flexible labor; they can be transferred, assigned to work in any of many affiliated colleges under the university's jurisdiction. Bribery is a common way for teachers to attempt to influence the transfer to a preferred location or reputable institution or that allows them to remain in one place, providing continuity for their children's education (interview Varghese).

A common type of institutional corruption in India involves bypassing the regulations for procurement, particularly in large-scale building projects for universities (interview Varghese) in return for payment or favours.

3.3.3. Different perceptions on acceptability of corruption within higher education

Sjur Bergan from CoE noted that their *"longer term goal is change of attitudes, so that ethics, transparency are seen as natural and corruption becomes unacceptable".* This aim reflects the motivation behind many individuals that the team communicated with. Bergan also talked about the need for contextualizing and sensitivity when publicly communicating about the unacceptability of

corruption: *"for example, if the Finnish authorities were to make a statement on anti-corruption then they would risk raising some eyebrows, suggesting that Finland was not quite as clean as you thought it was".* However, mentions of corruption would not be viewed as unusual in official statements in countries such as Romania, Nigeria, Albania and India.

It emerged from the interviews that some countries do not have national reference points for higher education standards. In India for example, the autonomy of universities leads to the situation where *"I go to a university in the south, I get 90%, you're from university in the north where you are getting only 80%; this 80% and 90% are not comparable"* (interview Varghese). This lack of comparability of higher education qualifications in India has led to the proliferation of selection tests before graduates are able to enter certain fields, *"if you want to go to the civil service …, if you want to go to the banking sector, you have to do a test, if you want to become a lecturer, you have another test"* (interview Varghese).

In Russian universities, professors with unearned doctorates are believed to be reducing the quality of student education: *"if the professor in the university has falsified his degree, his dissertation, so the influence for the students will be the same way, as he or she, they will not know how to behave differently. And we see this going on …"* (interview Rostovtsev).

In addition, further analysis of the fully plagiarised dissertations found by Dissernet volunteers revealed that the same "scientific advisors" were involved in supporting 20, 30, even as many as 50 of other plagiarized dissertations (interview Rostovtsev).

3.3.4 Views on actions against corruption in teaching roles in higher education

An example of a response to corrupt practices in teaching was offered by CoE's Sjur Bergan, who described a situation in a university in South-East Europe that had *"issued a rule saying that course books should no longer be sold in class, but purchased through the university book store, and you can imagine why, because the academic would no longer be able to keep a list of students who bought their books …. "* and use the list to decide who passed or failed the course.

Nora Skaburskiene was asked about a well-documented problem of academics having a portfolio of jobs, for various reasons:

> *"I think that is rather a big problem in Lithuania, because we have quite a big number of HEIs that are small, colleges of higher education, as part of the lecturers we call travelling lecturers that go from one place to another to provide studies, and that is because they cannot get their whole workload in one HE institution. Another problem was last year in the media, about low salaries of teaching staff, that's also affecting the situation".*

As reported earlier in the literature review, this problem is not confined to Lithuania (Schultheiss 2018, Glendinning 2013: 25; ORCA 2017b). This phenomenon is not always about corruption; there are sometimes clear economic reasons why academics might have several jobs to make up a living wage. However, this practice can result in a poor learning experience for students and less attention paid by the teacher to integrity, quality and standards than is desirable.

In Russia, Denisova-Schmidt was keen to point out that Dissernet's haul of over 8,200 totally plagiarised doctoral dissertations and almost 5,000 totally plagiarised academic papers, many from Russian academics, represents perhaps only 2% of dissertations, which "is really nothing in a country where corruption is the norm" (interview Denisova-Schmidt). However Rostovtsev made it clear that the 8,200 dissertations recorded to date represents the tip of the iceberg, because Dissernet has only catalogued the dissertations that were very close to 100% plagiarised (interview Rostovtsev).

3.3.5 Views on actions against corruption in HE admissions and recruitment

The head of Australia's TEQSA, Anthony McClaren, provided details of a new study they were undertaking on admissions. He explained *"about schools falsifying and inflating statistics on student matriculation results to boost their profile and reputation",* which is putting some students off applying to university and is *"a disincentive to widening participation efforts"* (interview McClaren). He went on to explain that if the proposed self-regulation of admissions to the HE sector is not effective then a

national clearing system like the UK's UCAS system may prove necessary.

A different perspective came from Lithuania where, as a small country, there is already *"a general admissions system, we have one centre that is responsible for the procedure, goes through one system, one door, students can choose institutions and study programmes there according to the results of the exams they have taken",*

but this only applies to undergraduate admissions; institutions are themselves responsible for master's and doctoral admissions (interview Skaburskiene). For suspected fraud in admissions, there is a reliance on the services of *"ENIC-NARIC as well there quite a lot of fraudulent cases …, when we think this may be a fraud we report this to the police, and yes we are doing also supervision of the decisions taken by higher education institutions on supervision of qualification recognition"*.

Denisova-Schmidt explained more about the Russian Unified State Examination (EGE) introduced in 2001 that became *"obligatory throughout Russia in 2009"*, providing admission to all universities in Russia. She explained that, under the old system, school leavers were only allowed to apply to one HE institution. If unsuccessful they were forced to wait a whole year to reapply elsewhere, which led to bribery and other forms of corruption to secure preferential admission. Under the current system, a student can apply to up to five institutions, which she believes has helped to eliminate some of the corrupt practices previously affecting Russian HE admissions (interview Denisova-Schmidt).

3.3.6. Views on actions against corruption in HE assessment

Ireland has recently been creating legislation to ban contract cheating companies, based on what is already implemented in New Zealand. The New Zealand legislation has already led to one successful prosecution (stuff-co-nz 2018). The legislative approach sends a powerful message to contract cheating companies, their employees or contractors and to students, that this practice is wrong and will not be tolerated by HEIs (informal discussions with Padraig Walsh, CEO of QQI).

A recent press release confirmed that this legislation is part of the Government's Qualifications and Quality Assurance (Education and Training) (Amendment) Bill 2018, clarifying QQI's roles, including *"The power to prosecute 'essay mills' and other forms of academic cheating such as sitting an exam for a student"* (QQI 2018; Government of Ireland 2018). It is of interest that the proposal assigns the power to prosecute contract cheating companies to QQI directly.

Evidence from Germany suggests that the activities of the VroniPlag group of academics in uncovering corruption and malpractice may be slowly starting to influence HE providers: *"Universities are starting very slowly to offer courses on how to write and good scientific practice …so there are baby steps being taken at some of the universities"* (interview Weber-Wulff). However, it may take some time to influence the whole sector: *"other universities are just playing the monkey game 'I don't see anything, I'm not hearing anything, I'm not going to speak about corruption' on the theory that we don't have that"* (interview Weber-Wulff).

Rostovtsev identified three specific academic disciplines where high levels of corruption occur in Russia: economics, law and pedagogy. He also clarified that he and his Dissernet colleagues found very little evidence of corruption in more technical subjects such as mathematics and physics.

In common with many other countries, university funding mechanisms in Russia, plus pressures from university administration to retain students and award pass marks, create disincentives for disciplinary measures to be applied against any form of student cheating (interview Denisova-Schmidt). Also the expectations for the standard of work students submit are less rigorous than in some other countries: *"it is kind of Russian way of writing academic papers - especially in theoretical part, you are not expected as a young student to produce your own theory, you just have to reflect other theories that have been already discussed previously"* (interview Denisova-Schmidt).

Many students around the world study for higher education qualifications by distance learning. If the assessment process in such arrangements is insecure, then this can generate opportunities for fraud and corruption, leading to unrepresentative student grades and unsafe standards in qualifications (interview Varghese). Technologies for identifying students, such as cameras and keystroke recordings, are being deployed by some providers to ensure that the correct candidate is taking the examination (TeSLA nd).

3.3.7 Views on actions against corruption in credentials and qualifications

Accreditation mills or unregistered accreditation bodies, often invented or supported by unregistered or fake institutions, are used to add credibility to low quality institutional profiles and deceive potential students about the authenticity and quality of an unaccredited HE provider (Cohen & Winch 2010; EQAR nd).

As mentioned in the literature review (Daniel 2018), a technological solution is emerging to address the global problem of false credentials and qualifications, many generated by "diploma mills" and unaccredited universities. The Groningen Declaration Network (GDN) is a rapidly growing international network of organizations, many supported by national governments, each offering a service to verify academic qualifications. GDN members are increasingly forming partnerships with other members to internationalize the range of qualifications they are able to verify. (More details follow under Networking 4.3.9.)

The GDN solution will not detect unearned qualifications and degrees that have been conferred fraudulently or negligently by genuine universities. Detecting and discouraging this form of corruption still requires vigilance through robust internal and external quality assurance. This form of corruption can be particularly harmful when people with degrees they did not deserve find themselves in responsible roles, perhaps in medicine, education or engineering professions (interviews Weber-Wulff, Rostovtsev).

Discussions with Tsutomu Kimura about QA in Japan confirmed that *"the system to combat degree mills and academic integrity breeches has not been established yet in Japan".* However Prof. Kimura expressed confidence that *"Thanks to the rigorous procedures of QA, it is extremely difficult for somebody to start a degree mill in Japan".*

As mentioned earlier, in Russia the majority of fake degrees are believed to emanate from genuine universities, rather than from bogus institutions: *"you see … Russian universities are simply the places where the students buy their diploma"* (interview Rostovtsev).

The efforts of many of volunteer groups are starting to bear fruit, as evidenced through increased awareness of the seriousness of the issues uncovered, through press and media reports about their activities. Views from the more prominent members of these groups are slowly beginning to feed into national or regional decision-making and are influencing public policy, institutional practices and individual conduct (interviews Weber-Wulff, Rostovtsev).

3.3.8 Views on actions against corruption in research and publication

Contributions to this part of the report came from Ivan Oransky, Retraction Watch; Chris Graf, COPE; Jeffrey Beall, originator of Beall's List; Debora Weber-Wulff, copy-shake-paste; Ivan Leban Slovenia QAA; Vigilijus Sadauskas, Lithuanian Ombudsman 2013-2018; Tsutomu Kimura, QA Japan; N.V. Varghese, India; and Andrei Rostovtsev and Elena Denisova-Schmidt, Russia.

From the perspective of this study, the main question is: *What are AQABs doing to address the problems in research and publication?* We can see from the questionnaire responses that in many countries, research and academic publishing does not come directly under the remit of the AQAB, but instead separate bodies, such as research councils, have responsibility for oversight.

The former Lithuanian Ombudsman explained about a relationship he established with their research council on the basis that *"they* [both] *work with scholars, academicians".* He explained about sanctions: *"Research Council of Lithuania has a set of rules, … a person, who … violated academic ethics cannot participate in certain research projects for 5 years".* When required the Ombudsman has communicated with equivalent post-holders internationally. For example, the German *"Ombudsman für Die Wissenschaft"* was contacted when a case of misconduct by a Lithuanian academic related to research conducted in Germany (interview Sadauskas).

Discussions via email with Tsutomu Kimura revealed that the Japanese Ministry for Education, Sport, Culture, Science and Technology (MEXT) issued guidelines to all research active institutions, which members of the three Japanese quality assurance groups contributed to, on how to handle cases of plagiarism in academic publications and how to deter such conduct.

The verdict from several interviewees (Beall, Leban, Oransky, Weber-Wulff) is that some academics from across the world are being driven to publish low-quality

academic papers and self-plagiarized, "salami-sliced" or duplicated publications, plagiarism by translation, or even to include plagiarized, fabricated or falsified data in their publications, because of the systems that are supposed to improve institutional quality. The systems in question include poorly designed rules for tenure and promotion and institutional ranking metrics, that Oransky called incentives: *"So you know in general terms I think that the pressure to publish in high-impact journals has had a pretty negative effect on research integrity"*.

In many countries, in parts of Europe and Asia for example, the main criterion for academic progression, or sometimes a condition for continuing in employment, is the number of publications, often with little regard for the quality or even whether the research results have been subject to scholarly peer review, commonly summarized as *"Publish or Perish"*. This practice becomes a form of corruption when academics deliberately exploit the use of disreputable journals and conferences for personal advantage. Weak regulations and mindless "box-checking" in internal and external QA systems are seen by some as partly responsible for fueling the very successful "predatory publishing" industry (Beall, Graf, Oransky).

Jeffrey Beall explained how his views have changed over time: *"initially I focused on the crimes and weaknesses of the predatory journals but now [I believe that] a lot of researchers themselves are just as bad as the predatory publishers, because when people get jobs or promotions based on bogus credentials, bogus achievements, this is bad for universities because you get professors who have not earned their positions"* (interview Beall). This view was echoed by Rostovtsev, in the context of plagiarism and falsification by Russian academics in both dissertations and academic papers.

Oransky talked about the way publishing is incentivized elsewhere: *"In other countries it's even worse, so you go to China … and not only is your promotion based on it, you get massive cash bonuses for publishing in these journals".* Another side to this problem is the lack of awareness and knowledge amongst some academics about how and where to publish. One of the difficulties is deliberate deception by the low-quality journals: *"many of the predatory journals intentionally have titles that are very close to or almost match those of respected journals so a lot of people are still tricked by them"* (Beall interview).

The predatory or discredited publishing sector continues to thrive, apparently unchecked, clearly due to significant demand for these services. If AQABs do not have a role

in monitoring and regulating academic publishing, then who should be responsible? Self-regulation rather than externally imposed rules is the option favoured by three contributors (Beall, Graf, Oransky), nor least because they believe the freedom and independence of the press should remain sacrosanct. Beall expressed the view that *"most of the responsibility [rests with] the scholarly publishing industry itself. It needs to regulate itself … other industries have standards … you have to pass … before you are allowed to practice in that profession, but the scholarly publishing industry has not done anything like that"*.

One of the burning issues in academic publishing surrounds the process of retraction. Oransky had a clear stance on this issue: *"One of the things we have to continue to push for is the need for clear and direct retraction notices, And in fact a couple of journals said 'yes you're right' and they've changed their polices and it is much, much better".* Retraction carries a stigma, potentially causing reputational damage for all involved, but as Graf pointed out *"there are a lot of reasons for retraction, not all are about research misconduct … If we want science to curate itself, then researchers need to be comfortable publishing retractions, recognise that publishing retractions is a good research practice"* (interview Graf).

The introduction of pre-print servers has led to some confusion. It is understood that reputable pre-print publishers subject the publications to an initial "sanity check" before making them available by open access, without peer review. This means they can be read very much earlier than a conventional peer reviewed academic *paper. When asked how people would know that a* pre-print paper (or a paper published in a disreputable journal) had not been subject to peer review, Graf responded:

> *"Well they don't, pre-print are new and people don't know, … but it is not clear whether they do any post publication curation, I suspect they leave that to the community, they often enable post publication comments against an article, I don't know whether they have any mechanism in place for retraction or to actually improve the publication-oriented method for post-publishing" (interview Graf).*

This response from an expert in this field suggests the need for more clarity and transparency by publishers using pre-print servers.

Peer review itself is a contentious subject. The point was made that, although peer review is not perfect, it does

normally prevent the publication of "bad science", and a holistic perspective is needed:

> "I think it is the importance of the whole peer review process here and that starts, before even the work has been submitted with the instructions to authors. And then persons will check the paper to see if it meets the author guidelines before sending to the reviewers and then they check to see if the peer reviewers have done their job OK and then the editor looks at the comments and figures out of what peer reviewer 1 has said makes any sense, contextualises that to what peer reviewer 2 has said, then synthesises that to advise the author; even then the peer review process does not stop there, checks are done by the content management system for the peer review publishing system quality process …." (interview Graf).

A different view was expressed by Jeffrey Beall, linked to "predatory publishing":

> "the problem is … the breakdown of peer review caused by predatory open access journals … basically you can publish anything you want and pretty-much everyone in the world can get it. Because of the breakdown in peer review there is a surge in pseudo-science being published and also now increasingly complicit researchers are using the easy or guaranteed acceptance that predatory publishers are selling to augment their CVs with long lists of publications" (interview Beall).

The establishment of a national independent regulatory body for research was one option considered in the UK's recent enquiry into research integrity (House of Commons 2018), to which two of the interviewees contributed (Graf for COPE and Oransky for Retraction Watch). The invitation to contribute to the consultation was seen as a sign that "people are paying attention" (interview Oransky) to the important work of these organizations.

COPE maintains a database of disputes-cases it has dealt with since it was founded in 1997, which was analyzed fairly recently (Hames 2013). The analysis shows that plagiarism remains a big issue, as do questionable research practices (QRP), queries about research data and authorship disputes (ibid). On the last point: "more often than not it is the result of an unhealthy research collaboration … or not agreeing things up front" (interview Graf).

There were many suggestions from interview participants about what more can be done to improve the situation in research and academic publishing. One important point was the need for more support, training, information and guidance for academics on publishing options and especially how to recognize disreputable journals and conferences and the implications about use of these services. There were several calls from interviewees for more clarity and transparency in processes surrounding publication. White lists and black list of journals and publishers were discussed in several of the interviews. An important point was made about such lists being problematic for new entrants to the publishing field, when new publishers do not appear on a white list or if they are wrongly classified as predatory or disreputable. This was seen as a barrier to starting a new publishing venture or academic journal that could be overcome by having a separate way of registering or recording genuine cases of start-up publishers and journals (interviews Graf, Oransky).

On the subject of corrupt practices undermining public trust in educational systems and science, Jeffrey Beall commented on the danger of "junk science that is being published … for example somebody believes in acupuncture, using predatory journals to write articles about basically what I believe is a pseudo-science … then what happens is people cite those articles in blogs and the people reading those blogs aren't able to differentiate between the fake articles and [genuine scientific papers] that are cited in the blogs" (interview Beall).

Rostovtsev reported that he was aware of one university that purchased a "block of papers from Western Journals" for the purpose of translating and then publishing as original papers under their own names in Russian language journals (interview Rostovtsev). He also was convinced, based on poor quality of publications from funded research, including fabrication and plagiarism of tables and charts, that there is significant corruption in Russian research grant funding (interview Rostovtsev).

Scientific journals in Russian aspiring to be indexed by Scopus and Web of Science databases, have given Dissernet another role: that of demanding retractions for plagiarism and falsification, which is enjoying some success. However, some of the editors contacted simply ignore the calls for retraction (interview Rostovtsev).

Publishing in disreputable or "predatory" journals can be a "threat to science itself, to science and research … science is cumulative and there is a lot of junk science out there" (interview Beall). It is sometimes difficult for academics

and researchers to discriminate between reputable and disreputable journals, research and publications (interviews Beall, Oransky, Graf).

The investigations of Dissernet have linked falsified and heavily plagiarized academic papers to the results from grant-funded scientific research, particularly for research in the fields of economics, law and pedagogy: *"we see the falsified tables in the papers, or some pictures, … if you go in the corrupted areas then scientific fraud is very high"* (interview Rostovtsev). Denisova-Schmidt's view was that *"what is more common in Russia, … people have some grants, some research supports and they have to show they have, say, three publications a year, and they may have two different research grants and they may show the same paper"*, presenting the same evidence to both funders, which could be seen as 'playing the system' rather than corruption.

Two of the people interviewed were very keen to present the positive side to their countries. While acknowledging that corruption in higher education is rife in countries like India and Russia, it is important to recognise the quality of research and contributions to science from many academics working in several highly respected universities and research institutes in both of these countries (interviews Varghese and Denisova-Schmidt).

3.3.9 Networking and communication to help address corruption in higher education

Some of the AQABs involved in the interviews work with partner organizations or companies that provide services to counter fraud in credentials and qualifications by checking the validity of credentials in different ways. For example, the UK's QAA works closely with HEDD; Australia's TEQSA (together with AQA New Zealand) work closely with Higher Ed Services on the implementation and development of My eQuals; in Ireland, the service is run by QQI itself. There is a *"mechanism that QQI has in place to allow employers to verify that a person presenting with QQI Qualifications is legitimate. This applies to most Irish FE qualifications (including apprenticeships) and private HE Qualifications where QQI is the awarding body"* (email communication with Padraig Walsh; QQI Verification nd). Some other countries, such as Lithuania, make use of ENIC-NARIC to support investigations into suspect credentials.

Many of these services are relatively new or still under development, but the powerful influence of the Groningen Declaration and associated network (GDN) is ensuring that all such organisations across the world are able to collaborate to share resources and learn from each other. Herman de Leeuw explained that when he worked for NARIC in Holland, he came across problems verifying qualifications. He described a specific case of a self-help group of refugees that started to call themselves a university, with no justification or authority. The government appeared to be supporting their self-proclaimed status and identity. This led to some "evangelical work" by de Leeuw to persuade government agencies and key stakeholders to act on the specific and wider problems. These included diploma mills and fake credentials as well as the lack of portability and verification methods for genuine qualifications, especially affecting refugees and displaced persons. The development of ideas on how to solve this range of problems led to the Groningen Declaration and subsequent formation of GDN in 2012.

According to de Leeuw, after the government clamped down on this self-help group of refugees, they started making plans to transfer their operations to the UK, which they saw as a haven for diploma mills and fake universities, as confirmed in the investigation by Cohen & Winch (2011). However, after threats that they would be reported to UK authorities, the group appear to have had a change of mind about relocating (de Leeuw interview).

The GDN web site now (autumn 2018) lists 82 signatories in 25 different countries. An annual GDN conference in different parts of the world enables members and potential members to report on progress and discuss ways to communicate, share data and discuss technological solutions.

Jayne Rowley, CEO of HECSU, responsible for operating HEDD, would like their UK qualifications repository to be more widely used by employers to check the authenticity of UK HE credentials when appointing new staff, suggesting that more needs to be done to encourage companies to use the service. The increasing international partnerships between such organizations are helping to improve the intelligence on degree fraud and fake universities. In particular Rowley highlighted legislation recently introduced in Belgium to close down

fake universities (Xinhus 2018), and South Africa has proposed introducing legislation to challenge degree fraud (Khan 2018) (email communications with Jayne Rowley).

Many interviewees provided interesting general insights, either from the organization they represent or more personal perspectives. Some were volunteers in their anti-corruption roles and a strong theme of altruism emerged concerning their motivation. These individuals often work with like-minded colleagues, and national groups are internationally interconnected, sharing intelligence and experiences on successes and failures.
channels for all the people interviewed, in order to

Journalism and social media are essential communication ensure their message is heard. Journalists sometimes can sensationalize or spin the material negatively. For example, CoE has a policy for *"emphasising ethics, integrity and transparency",* but *"in the press coverage … launching the ETINED platform in October 2015, all the press articles focused on anti-corruption"* (Bergan interview). A counter viewpoint from a journalist is that *"most institutions -- journals, universities, funders -- are not willing to discuss the details of any particular cases, nor take these issues head-on, for fear that the presence of fraud will be used against them. It's a very short-sighted strategy"* (email communications with Oransky).

4. Discussion

The central motivation of CIQG for supporting this study was to establish a baseline of what QA and accreditation bodies are doing now towards addressing academic corruption. This evidence will help CIQG to develop further projects and focus on relevant activities to build the required capacity with QA/Accreditation bodies. Evidence came from a range of different types of AQAB, each with its own mission and remit, with third-party evidence of the operations of AQABs captured from other sources. A very rich mixture of qualitative and quantitative data has been amassed and analysed.

The survey responses indicate that remits of the majority of AQABs responding to the survey do not include scrutiny of policies and process surrounding scientific research and the academic publication process, with only 15 of the 69 respondents selecting that option of which 12 identified themselves as quality assurance agencies (Question 5b).

It is notable that 43 of the 69 (62 percent) of AQABs responding to the survey said they had no concerns about corruption or academic integrity breaches in student assessment (Figure 14), and most respondents said they never or rarely encounter such problems (Figure 16). When we consider the overwhelming evidence of the prevalence of these types of corruption presented in the literature and the above feedback from the AQABs who are actively responding to the threats to quality and standards in higher education, these responses are very surprising. Regular awareness-raising events for AQABs and for key decision-makers responsible for HE strategy and funding could provide updates and information about the global threats from corruption and the implications for HE.

Although the overall number of participants in the survey and interviews was relatively low, many of the responses were rich and detailed. Feedback from participants provides much to consider. The nature and extent of corruption varies across different parts of the world, but there are some common problems that appear to affect the higher education sector globally (such as contract cheating, staff and student harassment, diploma mills and fake credentials, lack of research ethics, disreputable/ predatory publishing). Certain types of corruption are unusual in some regions but very prevalent in specific locations (including bribery, nepotism in academic appointments and favoritism in grading).

The contributions to this study from carefully targeted individual interview participants have helped to greatly enrich the evidence collected. Some participants helped

to fill a geographical gap in the evidence, especially concerning Russia (Rostovtsev, Denisova-Schmidt), India (Varghese) and Japan (Kimura). In other cases the participants provided more detailed evidence, especially about Kosovo (Gjinovci, Pupovci, Rogova-Damoni, Rexhaj and Krasniqi) and Lithuania (Sadauskas, Skaburskiene), where interesting phenomena had emerged. Interviewees helped to provide valuable intelligence about areas where the questionnaire responses had provided very little evidence, particularly concerning research and academic publishing (Oransky, Graf, Weber-Wulff, Beall). Some interviews and less formal conversations captured details of good practice in AQABs (Blackstock, McClaren, Walsh, Rowley, Skaburskiene, Leban).

The views of governments, government ministries and bodies that define the remit of AQABs were not included in this study. Also, absent from this study are the views of research councils and specifically designated research integrity bodies, often set up by governments either to regulate or to monitor the field of research and academic publication.

This research has thrown some light on the activities of AQABs that contributed to this study and captured their perspectives on quality, standards and corruption in higher education. How people understand the terms "quality" and "corruption" is rather important to this research and central to the process of tackling corruption in higher education. According to one contributor:

> *"We tend to talk about quality in education as if we actually know what it is. It tends to be seen as an entity that's out there and all we have to do is to achieve it. [The Council of Europe's] starting point is if you want to know if you are doing something well or not then it helps to know what you are trying to achieve in the first place" (Bergan interview).*

This insightful viewpoint provides food for thought in the context of this research. If those responsible for quality in higher education have different interpretations of what quality is and how to achieve it, then it is unsurprising to find disparities in standards and expectations. The same applies when defining what is deemed to be acceptable practice and what we mean by corruption.

An observation from the research team, based on findings from earlier research on institutional policies for addressing plagiarism, is that if AQABs are not looking for evidence of corruption and not expecting to find any such evidence, then it is unsurprising to find they are not aware of any corruption in the institutions they are auditing or accrediting.

It would be useful to understand why corruption occurs so that AQABs and HEIs can target their efforts accordingly (email discussion Leban). It is more effective where possible to address the causes rather than the symptoms of the problems.

Several contributors pointed to the system itself being responsible for creating perverse incentives, like publication quotas, job insecurity and low pay of academics that can drive corrupt behavior. Other respondents saw the culture of corruption in the wider society as the main driving force for educational corruption and the reason it is so difficult to mitigate.

It is very clear that there are many reasons and drivers for the misbehavior of people seeking qualifications, that can lead to demand for short-cuts to learning and assessment, which in turn fuels a whole global industry of fakery.

AQABs accrediting HE providers operating at national or international level rely on the universities and colleges to implement their own internal quality control systems to maintain academic integrity. However, it is clear from several interviews and other feedback that internal QA systems vary greatly, and the level of scrutiny by AQABs is sometimes superficial, typically relying largely on self-assessment and using check-lists during visits. Crucially, such approaches are unlikely to uncover evidence of corruption in an institution.

In addition to routine quality monitoring processes, institutions are responsible for internal policies and systems for fair recruitment (of both staff and students), detecting and deterring dishonesty and fraud in assessment of undergraduate, master's and PhD work, ensuring consistent standards in all degrees awarded and oversight of research activities. It is clear from this research that in some parts of the world, for example, India, internal QA processes can be very weak or absent, with no systematic means to challenge corrupt practices. Not all AQABs are assiduous in assessing whether institutions have suitable processes and systems for managing such activities. AQABs may lack evidence about operational deficiencies in HE providers, despite research suggesting there may be inadequate responses to corruption practices in these areas.

The role of an independent national or regional ombudsperson for higher education has proved valuable

in some countries, particularly for considering complaints from students and for receiving information from other interested parties about institutional irregularities, actions considered to be unfair, and reports of potential misconduct and corruption within HE providers. Where such a service is aligned with the regulatory body or AQAB responsible for quality and standards, then closer scrutiny of the institution can help to address the emerging issues. However, such a post needs to be independent, provided with the necessary resources, and not subject to questionable appointments or interference with political or malign motives.

Massification of higher education was highlighted by several participants as the root cause of many of the difficult problems discussed in this report that can directly or indirectly give rise to misconduct or corruption. There is a difficult balance to strike: on one side, providing equality of opportunity for student entry to higher education; on the other side, making sure all students are well supported for their educational experience, studying subjects that interest them and equipped with entry qualifications that give them a good chance of successful completion. If a student's motivation for studying is because the alternative is unemployment or national service, rather than an interest in the subject, they are more likely to take short-cuts, such as using a ghost-writer or cut-and-paste plagiarism.

Equally precarious is the academic, under pressure from overwork and low pay. They may feel tempted to supplement their income by taking bribes from students or taking on a portfolio of appointments at different institutions. Academics in these situations are also more likely to adopt questionable tactics to obtain publications in their name. Some students and academics may also be attracted by the prospect of working as ghost-writers or for contract cheating companies to earn extra money.

While some of the media are keen to seize on scandalous stories with remarkable and exceptional dramatic headlines, many journalists strive to present a more balanced viewpoint. Indeed, some journalists are central to the fight against corruption in higher education, academic research and publication (interviews Oransky, Rostovtsev, Graf, Weber-Wulff). The NGOs campaigning for academic integrity in Kosovo have found the relatively free press to be an essential ally in publicising their findings and mobilising public opinion against the

worst excesses. The many journalists referenced in this report have been instrumental in raising awareness of the threats to higher education through corruption and malpractice in a timely manner, and their investigations and press and media reports are helping to bring about positive change globally.

It appears that much of the misconduct and corruption resulting from unethical or inappropriate conduct of research surfaces as a result of media reports, often based on challenges by other researchers about claims made in peer-reviewed publications. When cases of misconduct are not found and addressed by the institution or the body responsible for quality monitoring, this does suggest some failings in quality assurance for the research and publication cycle.

Suggestions from participants for how to address different forms of corruption show some commonality, particularly about the need for interested parties to work together internationally towards solutions. There are signs that this is already happening, for example with communications beginning between AQABs in the UK, Australia and Ireland, specifically about legislative arrangements to outlaw contract cheating and associated marketing activities (personal communications).

There are many examples of activities on anti-corruption feeding into AQABs. The work of volunteer groups and individuals (for example: Retraction Watch, COPE, VroniPlag, Dissernet, anti-corruption groups and agencies, such as ORCA) is important in helping to highlight incidents of corruption that arise in education and beyond and to campaign for changes. These groups are helping to generate evidence and information that can be used to justify the development of new approaches by governments, AQABs and institutions to help address the problems. Many international bodies (particularly CHEA / CIQG, Council of Europe, IIEP / UNESCO, EUA, Transparency International and other NGOs) are investing resources to both investigate and encourage actions to stem poor practices and corruption in education and society. Networking also emerged as critically important for sharing knowledge and good practice (especially GDN and networks of AQABs, some of whom participated in this research).

5. Recommendations

A range of different parties have responsibility for the operation of AQABs, their terms of reference and their resourcing. However, as this study focuses on the actions taken by AQABs, the recommendations are addressed to them.

Recommendations for accreditation and quality assurance bodies:

1. Review terms of reference and standards in the light of the findings in this report and, if necessary, negotiate changes and further resources to more effectively address corruption and malpractice in higher education.

2. Make explicit the commitment to reducing corruption.

3. Ensure scrupulousness about transparency, accountability and integrity in every aspect of various activities.

4. Remain vigilant, and be prepared to challenge HE providers about any corrupt practices that may undermine quality or standards.

5. Pro-actively monitor and respond to suspicions of misconduct and corruption in any part of the operation and any responsibilities.

6. Arrange site visits at short notice to counter potential "gaming" of the process of QA or accreditation by HEIs.

7. Provide support for developing educational and research quality and standards and helping HE providers to address corruption. This is central to the role of all AQABs.

8. Regularly engage with and draw upon expertise within the HE sector to explore ways to discourage corruption.

9. Network locally and internationally with other organizations concerned with quality and standards as a means of sharing effective practices for fighting corruption.

10. Take a leadership role in advocating legislation to counter threats from diploma mills and accreditation mills as well as contract cheating companies.

11. Undertake research and consult with members of the HE community, including students, to inform and enhance policies and practices for addressing corruption and misconduct in education and research.

6. Conclusions

The evidence collected and analysed in this study helps to inform AQABs about the current situation on corruption in higher education globally. Results feed into commentary on good practice and suggest early warning indicators that can signal when QA standards in higher education and research are compromised.

It is anticipated that recommendations in this report and related publications about the research will provide the impetus for AQABs to review and possibly redefine their remit and approach towards identifying and challenging corrupt practices encountered in the course of their activities.

The findings of this report also have implications for all other players in the higher education community in fighting corruption. In particular, governments and professional bodies that establish AQABs and provide resources for them to operate have responsibility for ensuring they have sufficient support and funding to discharge their responsibilities as recommended.

Ultimately, committees, panels and institutions are about collective and personal responsibilities of the individuals that represent them. Every individual member of the higher educational community throughout the world, including members of government departments, accreditation panelists and institutional leaders, as well as researchers, academics, clerical officers and students, all must play a part in upholding integrity and standards in higher education globally.

References

AACRAO (2005). *Guide to Bogus Institutions and Documents*. American Association of Collegiate Registrars and Admissions Officers.

Abbott, A. (2016). Culture of Silence and nonchalance protected disgraced trachea surgeon. *Nature* 2nd September 2016. https://www.nature.com/news/culture-of-silence-and-nonchalance-protected-disgraced-trachea-surgeon-updated-1.20533. [accessed 2nd August 2018].

Abd El Galail, T. (2015). *Master's degree programs in Egypt plagued by corruption*. Al-Fanar Media, 28th June 2015. https://www.al-fanarmedia.org/2015/06/masters-degree-programs-in-egypt-plagued-by-corruption/ [accessed 12th July 2018].

Academic Integrity Seminar (nd). *Posthumous dedication to Donald McCabe*. http://integrityseminar.org/member/donald-mccabe/ [accessed 22nd July 2018].

ACA / AKK (nd). Anti-Corruption Agency, Kosovo. http://www.akk-ks.org/en/Home [accessed 22nd July 2018].

Academy of Medical Sciences (2015). Reproducibility and Reliability of Biomedical Research: improving Research Practice, Symposium report, October 2015. https://acmedsci.ac.uk/viewFile/56314e40aac61.pdf [accessed 6th August 2018].

Adams, R. (2017). Could Bath University's vice-chancellor's latest pay controversy be her last? The Guardian, 24th November 2017. https://www.theguardian.com/education/2017/nov/24/could-bath-university-vice-chancellors-latest-pay-controversy-be-her-last [accessed 14th September 2018].

AfD (nd) Gender Mainstream. Alternative für Deutschland party. https://afd-bw.de/partei/resolutionen/gender-mainstream [accessed 4th October 2018].

ALLEA (2017). The European Code of Conduct for Research Integrity (revised edition). https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics_code-of-conduct_en.pdf [accessed 6th August 2018].

Amadi, E.C., Opuiyo A.R. (2018). Examination Malpractice Among Nigerian University Students: A Review. *International Journal of Innovative Legal and Political Studies* 6(1): 13-17, Jan-Mar 2018.

ASA (2018). ASA ruling on All Answers Ltd, trading as UK Essays. Advertising Standards Authority, March 2018. https://www.asa.org.uk/rulings/all-answers-ltd-a17-394574.html [accessed 13th September 2018]

Atuhaire, P. (2018). Uganda's Makerere University: 'My lecturer tried to rape me'. BBC World Africa 14th March 2018. https://www.bbc.co.uk/news/world-africa-43287621. [accessed 2nd August 2018].

Bailey, J. (2018). Turnitin Announces New Tool to Combat Contract Cheating. *Plagiarism Today*, 6th February 2018. https://www.plagiarismtoday.com/2018/02/06/turnitin-announces-new-tool-to-combat-contract-cheating/ [accessed 15th February 2018].

BalkanInsight (2018). Kosovo Education Agency's Expulsion Angers Opposition MPs. 2nd March 2018. http://www.balkaninsight.com/en/article/opposition-blames-pm-for-expulsion-of-kosovo-accreditation-agency-from-eqar-03-02-2018. [accessed 2nd August 2018]

BBC Radio 4 (2018). *Degrees of Deception*. File on 4 audio recording, broadcast 21st January 2018. http://www.bbc.co.uk/programmes/b09ly731 [accessed 12th July 2018].

BBC News (2013) German minister Annette Schavan quits over 'plagiarism'. 9th February 2013. https://www.bbc.co.uk/news/world-europe-21395102 [accessed 27th August 2018].

BBC News (2015). *Vyapam: India's deadly medical school exam scandal*. 8th July 2015. http://www.bbc.com/news/world-asia-india-33421572 [accessed 12th July 2018].

BBC News (2018a). *Essay-writing companies banned from advertising*. 21st March 2018. http://www.bbc.co.uk/news/education-43474612 [accessed 12th July 2018].

BBC News (2018b). *'Junk food for exams' school head banned*. 31st May 2018. https://www.bbc.co.uk/news/uk-england-beds-bucks-herts-44317042 [accessed 12th July 2018]

BBC Panorama (2017). *Student Loan Scandal*. Broadcast on 13th November 2017. http://www.bbc.co.uk/programmes/b09g5l1c. [accessed 22nd July 2018].

Bendix, A. (2017). Turkey Dismisses Thousands of Police, Civil Servants and Academics. *The Atlantic* 14th July 2017. https://www.theatlantic.com/news/archive/2017/07/turkey-dismisses-thousands-of-police-civil-servants-and-academics/533754/ [accessed 24th July 2018].

Besser, L.; Cronau, P. (2015). Degrees of deception. Transcript of Four Corners Video, Australian Broadcasting Corporation ABC, 20th April 2015. http://www.abc.net.au/4corners/stories/2015/04/20/4217741.htm [accessed 12th July 2018].

Binning, S.A., Jutfelt, F., and Sundin, J. (2018). *Exorcise Citations to the 'living dead' from the literature*. Nature 18th June 2018. https://www.nature.com/articles/d41586-018-05386-5 [accessed 12th July 2018].

Borchers, C. (2017). Trump's threat to defund Berkeley after protest of Breitbart writer makes no sense. *Washington Post*, 2nd February 2017. https://www.washingtonpost.com/news/the-fix/wp/2017/02/02/trumps-threat-to-defund-berkeley-after-protest-of-breitbart-writer-makes-no-sense/?noredirect=on&utm_term=.2de871bc8cf4 . [accessed 2nd August 2018].

Bothwell, E. (2018). Global allies help Russian academy win new licence. *Times Higher Education*, 20th September 2018, p16.

Bradley, J. (2013). Integrity in Higher Education Marketing: A typology of misleading data-based claims in the university prospectus. *International Journal for Educational Integrity, Vol 9, No. 2*.(2013). DOI: http://dx.doi.org/10.21913/IJEI.v9i2.894

Bradley, J. (2018). Integrity in higher education marketing and misleading claims in the university prospectus: What happened next…and is it enough? *International Journal for Educational Integrity*, Vol 14, No. 3.(2018) https://doi.org/10.1007/s40979-018-0026-9

Bretag, T., Mahmud, S. (2013). 'Teach us how to do it properly!' An Australian academic integrity student survey, *Studies in Higher Education*, DOI:10.1080/03075079.2013.777406

Bretag, T. Mahmud, S. (2014). Exemplary Academic Integrity Project, Academic Integrity Toolkit. https://lo.unisa.edu.au/course/view.php?id=6751. [accessed 2nd August 2018].

Bretag, T., Harper, R., Saddiqui, S., Ellis, C., Newton, P., Rozenberg, P., and van Haeringen, K. (2016-2018). Contract Cheating and Assessment Design Project. https://cheatingandassessment.edu.au/ [accessed 2nd August 2018].

Bretag, T., Harper, R., Burton, M., Ellis, C., Newton, P., Saddiqui, S., Rozenberg, P. & van Haeringen, K. (2018). Contract cheating: A survey of Australian university students, *Studies in Higher Education*, 1-20. https://doi.org/10.1080/03075079.2018.1462788

Bull, A., Page, T. (2018). Universities can no longer turn a blind eye to staff dating students. *The Guardian* 4th April 2018. https://www.theguardian.com/higher-education-network/2018/apr/04/universities-can-no-longer-turn-a-blind-eye-to-staff-dating-students [accessed 10th September 2018].

Carroll, J. (2005). *Handling Student Plagiarism: Moving to Mainstream* [online] http://bejlt.brookes.ac.uk/articles/handling-student-plagiarism-moving-to-mainstream/ [accessed 23/07/18]

Carroll, J. and Appleton, J. (2001). *Plagiarism: A Good Practice Guide*. https://www.webarchive.org.uk/wayback/archive/20140614152728/http://www.jisc.ac.uk/media/documents/programmes/plagiarism/brookes.pdf. [accessed 2nd August 2018].

CBC (2017). List of schools linked to Axact, 14th September 2017. http://www.cbc.ca/marketplace/blog/list-of-schools-linked-to-axact [accessed 9th August 2018].

CCAD infographic (2018). Additional findings from a Survey of Students and Staff at Australian Universities. Contract Cheating and Assessment Design project. https://cheatingandassessment.edu.au/wp-content/uploads/2018/03/2018-infographic.pdf [accessed 27th August 2018].

CDSL (nd). Central Depository Services (India) Limited. https://www.cdslindia.com/index.html [accessed 10th August 2018].

CHEA / UNESCO (2011) Towards Effective Practice: Discouraging Degree Mills in Higher Education. Council for Higher Education Accreditation and United Nations Educational, Scientific and Cultural Organisation. http://unesdoc.unesco.org/images/0018/001832/183247e.pdf [accessed 2nd August 2018]

CHESICC (ND) Chinese Credentials Verification. http://www.chsi.com.cn/en/aboutus/index.jsp

Clarke, R. and Lancaster, T. (2006). Eliminating the Successor to Plagiarism? Identifying the Usage Of Contract Cheating Sites. 2nd Plagiarism: Prevention, Practice and Policy Conference 2006 - organised by JISC Plagiarism Advisory Service, Newcastle, UK, June 2006.

Cohen, E.B, and Winch, R. (2011). Diploma and Accreditation Mills: New trends in Credential Abuse. http://www.esrcheck.com/file/Verifile-Accredibase_Diploma-Mills.pdf [accessed 12th July 2018]

COPE (nd). Committee on Publication Ethics. http://publicationethics.org/ [accessed 28/04/2018]

Council of Europe. (nd). ETINED platform: http://www.coe.int/en/web/ethics-transparency-integrity-in-education/about-etined. [accessed 6th August 2018].

Crowthorne, E. (2017). Degrees of Fraud. BBC Radio 4, broadcast Sunday 9th April 2017. http://www.bbc.co.uk/programmes/b08kv5fd. [accessed 2nd August 2018].

Cyranoski, D. (2018). China introduces sweeping reforms to crack down on academic misconduct. *Nature*, published 5th June 2018. https://www.nature.com/articles/d41586-018-05359-8. [accessed 2nd August 2018].

Daniel, J. (2018). Innovating in an Age of Uncertainty. CHEA / CIQG. https://www.chea.org/sites/default/files/pdf/Daniel.pdf. [accessed 2nd August 2018].

Dawson, P. & Sutherland-Smith, W. (2017). Can markers detect contract cheating? Results from a pilot study, *Assessment & Evaluation in Higher Education*, DOI:10.1080/02602938.2017.1336746.

Denisova-Schmidt, E. (2016). Corruption in Russian Higher Education. *Russian Analytical Digest* No. 191, 3rd November 2016, pp 5-7. http://www.css.ethz.ch/content/dam/ethz/special-interest/gess/cis/center-for-securities-studies/pdfs/RAD191.pdf. [accessed 6th August 2018].

Denisova-Schmidt, E. (2017). The Challenges of Academic Integrity in Higher Education. http://bit.ly/2sdLO8J. [accessed 2nd August 2018].

Denisova-Schmidt, E., Huber, M., and Leontyeva, E. (2016a) On the Development of Students' Attitudes towards Corruption and Cheating in Russian Universities. http://dx.doi.org/10.1080/21568235.2016.1154477

Denisova-Schmidt, E., Huber, M. and Leontyeva, E. (2016b). Do Anti-Corruption Educational Campaigns Reach Students? Some Evidence from two cities in Russia and Ukraine, https://vo.hse.ru/2016--1/178805268.html.

DHET (2015). Say "no!" to fake qualifications. Department of Education and Training South Africa, 16th September 2015. http://www.dhet.gov.za/SiteAssets/Latest%20News/September/Fake%20qualifications%20AC%20160915.1.pdf [13th September 2018].

Dissernet (nd) Video in Russian with English sub-titles: https://yadi.sk/i/Er-ljApn3FufpG

Downes, M. (2017). University scandal, reputation and governance, *International Journal of Educational Integrity*, Springer Nature. https://edintegrity.springeropen.com/track/pdf/10.1007/s40979-017-0019-0

Draper, M. J., Ibezim, V., Newton, P.M. (2017). 'Are Essay Mills Committing Fraud? An Analysis of Their Behaviours vs the 2006 Fraud Act (UK)'. *International Journal for Educational Integrity* 13 (1): 3. doi:10.1007/s40979-017-0014-5.

Draper, M.J., Newton, P.M. (2017). A Legal Approach to Contract Cheating? , International Journal of Educational Integrity, Springer Open. https://www.springeropen.com/track/pdf/10.1007/s40979-017-0022-5?site=edintegrity.springeropen.com

Dubrovsky, D. (2017). Escape from Freedom. The Russian Academic Community and the Problem of Academic Rights and Freedoms. Interdisciplinary Political Studies, 3(1), 177-199.

ENIC-NARIC (nd). International service for evaluation of credentials and equivalence. http://www.enic-naric.net/

EQAR (nd) Diploma and Accreditation Mills: Knowledge Base. https://eqar.eu/topics/accreditation-mills.html [accessed 22nd July 2018].

ESF (nd). European Science Foundation. http://www.esf.org/. [accessed 2nd August 2018].

EssayScam.org (2018) Discussion Forum: https://essayscam.org/forum/gt/extortion-blackmail-email-writer-6258/

ETICO (nd) IIEP – UNESCO platform on ethics, transparency and integrity in Education. http://etico.iiep.unesco.org/en [accessed 6th August 2018]/

ETINED (nd) Council of Europe Platform on Ethics, Transparency and Integrity in Education. https://www.coe.int/en/web/ethics-transparency-integrity-in-education/home . [accessed 18th July 2018]

EUA (nd) European University Association. http://www.eua.be/.

EUS (2018). The Federation of the French-speaking students in Belgium denounce "Fake Universities". European Students' Union 27th March 2018. https://www.esu-online.org/?news=fef-denounce-fake-universities [accessed 6th September 2018].

Fagbemi, T.O. (2018). *Whistleblowing intention: Evidence from future accountants in Universities located in Kwara State, Nigeria*. Fountain University Osogbo Journal of Management 2.1 (2018).

Fanelli, D. (2010). Do pressures to Publish Increase Scientits' Bian? An Empirical Support from US States Data. PLOS ONE 5(4): e10271. https://doi.org/10.1371/journal.pone.0010271 .

Finchilescu, G., Cooper, A. (2018). Perceptions of academic dishonesty in a South African university: a q-methodology approach. *Ethics & Behavior* 28.4 (2018): 284-301.

Foltýnek, T., Dlabolová, D., Glendinning, I., Lancaster, T., and Linkeschová, D.(2018). ETINED - Council of Europe Platform on Ethics, Transparency and Integrity in Education - Volume 5 - South East European Project on Policies for Academic Integrity Council of Europe. https://book.coe.int/usd/en/education-policy/7531-etined-council-of-europe-platform-on-ethics-transparency-and-integrity-in-education-volume-5-south-east-european-project-on-policies-for-academic-integrity.html [accessed 22nd July 2018].

Forrest, A. (2018). Tokyo Medical University 'changes women's exam results' to limit the number of female doctors. *The Independent*, 3rd August 2018. https://www.independent.co.uk/news/world/asia/tokyo-medical-exam-results-female-doctors-grades-changed-medicine-a8475966.html [accessed 17th August 2018].

Fox News (2018). Chinese Student deported from USA for using an impersonator. http://www.foxnews.com/us/2018/04/05/chinese-student-to-be-deported-after-paying-3000-to-impostor-to-help-her-get-into-american-university.html

Fursova & Simons (2014). Social problems of modern Russian higher education: The example of corruption. *International Education Studies*; Vol. 7, No. 10; 2014, Published by Canadian Center of Science and Education. ISSN 1913-9020 E-ISSN 1913-9039.

Glendinning, I. (2013) Comparison of Policies for Academic Integrity in Higher Education across the European Union, on-line http://www.plagiarism.cz/ipheae/ [accessed 22nd July 2018].

Glendinning, I. (2016) Book Chapter: European Perspectives of Academic Integrity in the *Handbook of Academic Integrity*, edited by Tracey Bretag, Springer Science + Business Media Singapore 2015. DOI 10.1007/978-981-287-079-7_3-2.

Golubeva, M., and Kanina, V. (2017) Codes of conduct for Teachers in Europe: a background study. ETINED: Council of Europe Platform on Ethics, Transparency and Integrity in Education. Volume 4. http://etico.iiep.unesco.org/en/resource/etined-council-europe-platform-ethics-transparency-and-integrity-education-volume-4-codes. [accessed 22nd July 2018].

Government of Ireland (2018). Qualifications and Quality Assurance (Education and Training) (Amendment) Bill 2018. https://data.oireachtas.ie/ie/oireachtas/bill/2018/95/eng/initiated/b9518s.pdf [accessed 9th August 2018].

Government Office of Sweden (2018). Need for uniform rules to handle alleged research misconduct. Press release 25th June 2018. https://www.government.se/press-releases/2018/06/new-procedure-for-handling-alleged-research-misconduct/. [accessed 6th August 2018].

Groningen Declaration Network (GND) (nd) https://www.groningendeclaration.org/who-we-are/ [accessed 9th August 2018].

Healey, D. (2018). Education for sale: Inside the firms using Scots academics to sell essays to desperate students. *The Courier*, 8th October 2018. https://www.thecourier.co.uk/fp/news/scotland/738922/education-for-sale-inside-the-firms-using-scots-academics-to-sell-essays-to-desperate-students/ [accessed 25th October 2018].

Hames, I. (2013). COPE's publication ethics cases: reclassification and analysis. https://publicationethics.org/files/u7140/Hames%20

EASE%20Workshop%20Intro%20to%20COPE%2024Sept13%20 FINAL.pdf [accessed 9th August 2018].

Havergal, C. (2016). Bar essay mills from advertising and search engines, says QAA. *Times Higher Education*, 18th August 2016. https://www. timeshighereducation.com/news/bar-essay-mills-advertising-and-search-engines-says-qaa [accessed 30th August 2018].

HEFCE (2017). Enquiry concerned with governance surrounding senior pay at University of Bath. Higher Education Funding Council for England, 20th November 2017. http://www.hefce.ac.uk/reg/staffpay/bath/ [accessed 14th September 2018].

HEDD (nd). Higher Education Digital Datacheck: https://hedd.ac.uk/ [13th September 2018].

Högskoleverket (2011). External Review of the Evaluation Activities of the Swedish National Agency for Higher Education – Self-evaluation report. Swedish National Agency for Higher Education 2011. http://www.uka.se/download/18.12f25798156a345894e2b6e/14878419034 04/1118R-external-review-evaluation-national-agecy.pdf [accessed 22nd July 2018].

Hope, K.R. (2017). *Corruption and Governance in Africa*. Palgrave Macmillan, Cham, 2017. 125-162.

House of Commons (2018) Research Integrity. 11th July 2018. https://publications.parliament.uk/pa/cm201719/cmselect/cmsctech/350/350.pdf [accessed 22nd July 2018].

House of Commons (2011). Peer review in Scientific Publications. Vol 1, 28th July 2011. https://publications.parliament.uk/pa/cm201012/cmselect/cmsctech/856/856.pdf [accessed 22nd July 2018].

ICAI (2018). International Data of Action against Contract Cheating. http://contractcheating.weebly.com/ [accessed 6th August 2018].

IIEP, CIQG (2016). Advisory Statement for Effective International Practice Combatting Corruption and Enhancing Integrity: A Contemporary Challenge for the Quality and Credibility of Higher Education. IIEP/UNESCO and CHEA / CIQG. http://unesdoc.unesco.org/images/0024/002494/249460E.pdf [accessed 4th November 2018].

IIEP/UNESCO (nd). ETICO platform of resources. http://etico.iiep.unesco.org [accessed 22nd July 2018].

IIEP/UNESCO (2015) Toolkit on Teacher codes of conduct: http://etico.iiep.unesco.org/en/teacher-codes-conduct [accessed 6th August 2018]

IPPHEAE (2013-15). Project results: National reports on plagiarism policies in 27 different European countries, on-line http://www.plagiarism.cz/ippheae/ [accessed 22nd July 2018].

JISC Electronic Plagiarism Project: http://www.jisc.ac.uk/whatwedo/programmes/plagiarism/archive/detection.aspx [accessed 22nd July 2018]

Kaiser, J. (2015). Duke University officials rebuffed medical student's allegations of research problems. *Science Mag*, 12th January 2015. http://www.sciencemag.org/news/2015/01/duke-university-officials-rebuffed-medical-student-s-allegations-research-problems.

[accessed 6th August 2018].

Kakucki, S. (2018). Bribery allegation shakes higher education sector. *University World News*, 12th July 2018. http://www.universityworldnews.com/article.php?story=20180712132556849 [accessed 18th August 2018].

Karasz, P. (2012). *Hungarian President Resigns Amid Plagiarism Scandal*. *New York Times*, 2nd April 2012. https://www.nytimes.com/2012/04/03/world/europe/hungarian-president-pal-schmitt-resigns-amid-plagiarism-scandal.html [accessed 15th September 2018].

Khan, T. (2018). Those with bogus degrees must be named and shamed, department says. *Business Day*, 1st August 2018. https://www.businesslive.co.za/bd/national/2018-08-01/those-with-bogus-degrees-must-be-named-and-shamed-department-says/ [accessed 6th September 2018].

Kigotho, W. (2013). Corruption is eroding higher education's benefits. *University World News, Africa*. http://www.universityworldnews.com/article.php?story=20131001160142405

Kravjar, J. (2012). Barrier to thriving plagiarism. http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.259.7921&rep=rep1&type=pdf [accessed 14th September 2018].

Kreightbaum, A. (2018). DeVos Restores Recognition of For-Profit Accreditor Terminated by Obama Administration. *Inside Higher Education* 4th April 2018. https://www.insidehighered.com/quicktakes/2018/04/04/devos-restores-recognition-profit-accreditor-terminated-obama-administration?utm_source=Inside+Higher+Ed&utm_campaign=7247688b4a-DNU20180111&utm_medium=email&utm_term=0_1fcbc04421-7247688b4a-197622973&mc_cid=7247688b4a&mc_eid=776a4f0a63 [accessed 6th August 2018]

Kurilla, I. (2016). Education in Russia 2016. *Russian Analytical Digest* No. 191, 3rd November 2016, pp 2-4. http://www.css.ethz.ch/content/dam/ethz/special-interest/gess/cis/center-for-securities-studies/pdfs/RAD191.pdf. [accessed 6th August 2018].

Lancaster, T. and Clarke, R. (2016). Contract Cheating – The Outsourcing of Assessed Student Work, in H*andbook of Academic Integrity*, Bretag, T. (editor): SpringerReference.

Limani L (2017) Education Minister fires Accreditation Agency board upon Haradinaj's request, *Prishtina Insight* 26 September 2017, https://prishtinainsight.com/education-minister-fires-board-accreditation-agency-upon-haradinajs-request/

MacAskil, A., Stecklow, S., and Miglani, S. (2015). Broken health: Rampant fraud at medical schools leaves Indian healthcare in crisis. Reuters. http://www.reuters.com/investigates/special-report/india-medicine-education/ [accessed 22nd July 2018].

Macdonald, R. and Carroll, J. (2006) Plagiarism: A Complex Issue Requiring a Holistic Institutional Approach. *Assessment and Evaluation in Higher Education* 31 (2), 233-245

McCabe, D.L. (2015). Cheating and Honor: Lessons from a Long-Term Research Project. https://www.researchgate.net/profile/Donald_Mccabe [accessed 22nd July 2018]

McCabe, D.L., Trevino, L.K., and Butterfield, K. (2001). Cheating in Academic Institutions: A Decade of Research. Ethics and Behavior July 2001. DOI: 10.1207/S15327019EB1103_2.

McCook, A. (2016). Why plagiarism is such a problem for German PhDs: Q&A. Retraction Watch, 11th February 2016. https://retractionwatch.com/2016/02/11/why-plagiarism-is-such-a-problem-for-german-phds-qa-with-debora-weber-wulff/ [accessed 10th September 2018].

McCook, A. (2018a) Duke's mishandling of misconduct prompts new U.S. government grant oversight. *Science Mag*, 23rd March 2018. http://www.sciencemag.org/news/2018/03/duke-s-mishandling-misconduct-prompts-new-us-government-grant-oversight [accessed 6th August 2018].

McCook, A. (March 2018b). A new publishing approach – retract and replace – is having growing pains. Retraction Watch 23rd March 2018. https://retractionwatch.com/2018/03/29/a-new-publishing-approach-retract-and-replace-is-having-growing-pains/ [accessed 6th August 2018].

McKie, A. (2018a). Sexual abuse rife at Makerere University, report finds. *Times Higher Education*, 29th June 2018. https://www.timeshighereducation.com/news/sexual-abuse-rife-ugandan-university-report-finds [accessed 28th July 2018].

McKie, A. (2018b). Irish Law to clamp down on essay mills 'could be a model for UK'. *Times Higher Education*, 9th August 2018. https://www.timeshighereducation.com/news/irish-law-clamp-down-essay-mills-could-be-model-uk [accessed 15th August 2018].

Maina, S.B. (2015). Certificates of doom: how universities and colleges sell diplomas and clean up degrees. NTV video, Daily Nation, Kenya.

Mazodier, M., Foucault, M., Blemont, P., and Kesler, S.(2012) . La fraude aux examens dans l'enseignement supérieur - Rapport à Monsieur le ministre de l'Enseignement supérieur et de la Recherche (April 2012). http://www.ladocumentationfrancaise.fr/var/storage/rapports-publics/124000295.pdf [accessed 6th August 2018].

MICCEDU (nd). Monitoring the efficiency of the activities of higher education organizations. http://indicators.miccedu.ru/monitoring/ (Russian language) [accessed 4th October 2018].

Mohamedbhai, G. (2016) The scourge of fraud and corruption in higher education. *International Higher Education*, 84, 12-14. https://ejournals.bc.edu/ojs/index.php/ihe/article/viewFile/9111/8211 [accessed 22nd July 2018].

Morris, E., *Policy Works* (2011) Higher Education Academy / JISC. https://www.heacademy.ac.uk/system/files/policy_works_0.pdf [accessed 18th July 2018]

My eQuals (nd). Secure access to certified official transcripts. https://www.myequals.edu.au/ [accessed 9th August 2018].

NACES (nd). National Association of Credential Evaluation Services. http://www.naces.org/ [accessed 12th November 2018].

NASUWT The Teachers' Union (2018) Sexual Harassment rife in the workplace. 4th July 2018. https://www.nasuwt.org.uk/article-listing/sexual-harassment-rife-in-the-workplace.html [accessed 6th August 2018].

NDML (nd). NSDL Database Management Limited. https://ndml.in/national-academic-depository.php. [accessed 10th August 2018.

OIG (2018). Review of the operations of Office of Postsecondary Education's (OPE) Accreditation Group. U.S. Department of Education Office of Inspector General, Published 27th June 2018. https://www2.ed.gov/about/offices/list/oig/auditreports/fy2018/a09r0003.pdf [accessed 6th August 2018].

Ojsteršek, M., Brezovnik, J., Kotar, M., Ferme, M., Hrovat, G., Bregant, and A., Borovič, M. (2014). Establishing of a Slovenian open access infrastructure: a technical point of view. Program, 48(4): 394-412.

O'Malley, B. (2018a). Developing countries showing way to fight fraud. *World University News*, Issue 488, 13th January 2018. http://www.universityworldnews.com/article.php?story=20180113050608736#.Wlzrp7rEZPw.mailto [accessed 19th August 2018].

O'Malley, B. (2018b). The digital revolution in cheating has already begun. *University World News*, Issue 513, 7th July 2018. http://www.universityworldnews.com/article.php?story=20180707045425397 [accessed 19th August 2018].

Oransky, I. (2018). What took more than five years? Elsevier retracts 20 papers by world's most prolific fraudster. Retraction watch, 17th May 2018. https://retractionwatch.com/2018/05/17/what-took-more-than-five-years-elsevier-retracts-20-papers-by-worlds-most-prolific-fraudster/. [accessed 6th August 2018].

ORCA (2016). Analysis: The Secret Changes in the Draft Law for Higher Education in Kosovo Undermine Academic Integrity. http://orca-ks.org/wp-content/uploads/2017/02/Analysis-The-secret-changes-in-the-Draft-Law-for-Higher-Education-in-Kosovo-undermine-academic-integrity.pdf

ORCA (2017a). The Academic Integrity of the Managing Staff of the University of Prishtina. http://orca-ks.org/wp-content/uploads/2017/02/ORCA-Raporti-Komplet-English.pdf

ORCA (2017b). The Academic Integrity of Professors of the University of Prishtina, http://orca-ks.org/wp-content/uploads/2017/12/The-Academic-Integrity-of-Professors-of-the-University-of-Prishtina.pdf

Orim, S. M. (2013). Exploring Nigerian postgraduate students' experience of plagiarism: A phenomenographic case study. *International Journal for Educational Integrity* 9.1

Orim, S.M., and Awala-Ale, A.(2017). Exploring Students' Perception and Experience of Ghostwriting and Contract Cheating in Nigeria Higher Education Institutions. *World Journal of Educational Research 4.4 (2017): 551*.

Osipian, A. L. (2016) . Corruption scandal in the Far East, *University World News* Issue #410. http://www.universityworldnews.com/article.php?story=20160419152126958

Osuji, C. (2016). *Sorting in Universities and its negative effects*. *The Moment* Nigeria, 12th April 2016. http://themoment.com.ng/opinion/63-opinion/1331-sorting-in-universities-and-its-negative-effects [accessed 1st September 2018].

Packer, M. (2018). Overdue: Civilised Post-Publication Peer Review. https://www.medpagetoday.com/blogs/revolutionandrevelation/73587 [accessed 6th August 2018].

Park, C. (2003). In other (people's) words: plagiarism by students—literature and lessons, *Assessment & Evaluation in Higher Education*, 28(5), pp. 471–488.P472

Park, C. (2004) Rebels without a Cause: Towards an Institutional Framework for Dealing with Student Plagiarism, Journal of further and Higher Education 28 (3), 291-306

Pells, R. (2018). Hungarian officials pursue Orbán goal of eliminating gender studies. *Times Higher Education* 13th August 2018. https://www.timeshighereducation.com/news/hungarian-government-pushes-forward-plan-ban-gender-studies. [accessed 28th August 2018].

Pells, R. (2018). Brazilian academics vow to resist threats to academic freedom. *Times Higher Education*, 19th November 2018. https://www.timeshighereducation.com/news/brazilian-academics-vow-resist-threats-freedom [accessed 19th November 2018].

Pillay, K. (2018) Students attack Lecturers. *The Witness*, 10th July 2018. https://m.news24.com/SouthAfrica/News/students-attack-lecturers-20180709 [accessed 18th July 2018].

Pinchuk, A., Coalson, R. (2018). Exam Fail: Leaked Questions Burn Whistle-blowing Russian Teacher, Not Cheaters. Radio Free Europe blog. https://www.rferl.org/a/exam-fail-leaked-questions-burn-whistle-blowing-russian-teacher-not-cheaters/29293569.html [accessed 6th August 2018].

Poisson, M. (2009). Guidelines for the design and effective use of teacher codes of conduct. IIEP-UNESCO. http://teachercodes.iiep.unesco.org/teachercodes/guidelines/Guidelines.pdf [accessed 6th August 2018].

PrishtinaInsight (2017). Education Minister fires Accreditation Agency Board upon Haradinaj's request. Published 26th September 2017. https://prishtinainsight.com/education-minister-fires-board-accreditation-agency-upon-haradinajs-request/ [accessed 6th August 2018].

PrishtinaInsight (2018) German university to revoke PhD title of Kosovo lecturer, published 2 Feb 2018, https://prishtinainsight.com/german-university-revoke-phd-title-kosovo-lecturer/ [accessed 10th September 2018].

Qian Chen (2018). Plagiarism is rampant in China. https://www.cnbc.com/2018/01/23/ip-plagiarism-is-rampant-in-china-and-media-companies-profit-from-it.html [accessed 6th August 2018].

QAA (2016). Education, deterrence, detection: How to tackle the problem of essay mills. http://www.qaa.ac.uk/en/Publications/Documents/Plagiarism-in-Higher-Education-2016.pdf [accessed 18th July 2018].

QAA (2017) Contracting to Cheat in Higher Education, (Quality Assurance Agency). http://www.qaa.ac.uk/docs/qaa/quality-code/contracting-to-cheat-in-higher-education.pdf?sfvrsn=f66af681_8 [accessed 29th October 2018].

QAA (2018a) Quality Code, (Quality Assurance Agency) http://www.qaa.ac.uk/quality-code [accessed 22nd July 2018].

QAA (2018b). Admissions, malpractice, academic fraud and the falsification of evidence in 19 alternative providers in London. https://www.timeshighereducation.com/news/academic-fraud-real-challenge-uks-quality-assurance. [accessed 6th August 2018].

QQI (2018). Press release: QQI welcomes Cabinet approval of Quality amendment bill, 23rd July 2018. https://www.qqi.ie/News/Pages/QQI-welcomes-Cabinet-approval-of-Quality-Amendment-Bill.aspx [accessed 9th August].

QQI Verification (nd). Verification of Qualifications: https://qhelp.qqi.ie/employers/verification-of-qualifications/ [accessed 9th August 2018].

Redden, E., and Jaschik, S. (2015). Indicted for Cheating. *Inside Higher Ed*. 29th May 2015. https://www.insidehighered.com/news/2015/05/29/chinese-nationals-indicted-elaborate-cheatingscheme-standardized-admissions-tests [accessed 6th August 2018].

Respect Project (2004) *RESPECT code of practice* http://www.respectproject.org/code/respect_code.pdf [accessed 18th July 2018].

Retraction Watch (nd). https://retractionwatch.com/ [accessed 6th August 2018].

Retraction Watch (2014). Sage Publications busts 'peer review ring', 60 papers retracted. July 2014. https://retractionwatch.com/2014/07/08/sage-publications-busts-peer-review-and-citation-ring-60-papers-retracted/ [accessed 14th September 2018).

Retraction Watch (2018). Researchers pull Nature paper over first author's objections. 9th July 2018. https://retractionwatch.com/2018/07/09/researchers-pull-nature-paper-over-first-authors-objections/. [accessed 6th August 2018].

Rettinger, D. (2018). We don't have a cheating problem. ICAI blog post, 20th August 2018. https://academicintegrity.org/uncategorized/we-dont-have-a-cheating-problem/ [accessed 30th August 2018].

Reuters(2018). Hungary to stop financing gender studies - PM aide. Reuters World News, 14th August 2018. https://uk.reuters.com/article/uk-hungary-government-education/hungary-to-stop-financing-gender-studies-courses-pm-aide-idUKKBN1KZ1LU [accessed 27th August 2018].

Rostovtsev, A. (2015). Some Observations on the Subject of Dissertation Fraud in Russia. *HERB: Higher Education in Russia and Beyond*, 3(5), 17–18. https://herb.hse.ru/data/2015/09/22/1075563638/HERB_05_view.pdf [accessed 22nd July 2018]

Rostovtsev, A. (2016). Fake Academic Degrees in Russia. Blogpost 1st March 2016. https://copy-shake-paste.blogspot.co.uk/2016/03/fake-academic-degrees-in-russia.html

Rowell, G. (2009) A National Strategy for Ensuring Authenticity in Student Work, EDULearn13 Conference, Barcelona, Spain 6th-8th July 2009

Schiermeier, Q. (2012). Conflicting verdicts on Romanian prime minister. *Nature* 20th July 2012. https://www.nature.com/

news/conflicting-verdicts-on-romanian-prime-minister-s-plagiarism-1.11047 [accessed 17th August 2018].

Schultheiss, K. (2018). Ghost Advising. *The Chronicle of Higher Education* 4th March 2018. https://www.chronicle.com/article/Ghost-Advising/242729 [accessed 6th August 2018].

Singh, O. (2018). Breach of academic integrity endangering education in India. *News Nation India*, 28th June 2018. http://www.newsnation.in/opinion/onkar-singh/breach-of-academic-integrity-endangering-education-in-india-article-197819.html. [accessed 18th July 2018].

Slovak Spectator (2016). UPJŠ's Medical Faculty accused of corruption. http://spectator.sme.sk/c/20098587/upjss-medical-faculty-accused-of-corruption.html. [accessed 18th July 2018].

Smith, A. (2018). Improper Grade Changes at Community College. *Inside Higher Ed*, 15th November 2018. https://www.insidehighered.com/news/2018/11/15/investigation-finds-texas-college-allegedly-changed-nursing-students-grades [accessed 16th November 2018].

Smith, I., Hamilton, T. (2017). *Baseline Assessment of Integrity in Higher Education in Kosovo*, for Horizontal Facility for Western Balkans and Turkey, EU/ Council of Europe.

Spooner, M. (2018). Why Kenyan students are cheating in exams and what can be done about it. *The Conversation Africa*, 17th July 2018. https://www.the-star.co.ke/news/2018/07/17/why-kenyan-students-are-cheating-in-exams-and-what-can-be-done_c1788188. [accessed 19th July 2018].

Stuff.co.nz (2018). Alleged 'ghost writing' business settles with police over court action. https://www.stuff.co.nz/national/crime/105064206/alleged-ghost-writing-business-settles-with-police-over-court-action. 27th June 2018. [accessed 18th July 2018].

Szeto, E., Vallani, N. (2017). "Hundreds of Canadians have phoney degrees". CBC news article 14th September 2017. http://www.cbc.ca/news/business/diploma-mills-marketplace-fake-degrees-1.4279513?cmp=rss&utm_source=Academica+Top+Ten&utm_campaign=b0c50b7056-EMAIL_CAMPAIGN_2017_09_11&utm_medium=email&utm_term=0_b4928536cf-b0c50b7056-51904845. [accessed 9th August 2018]

Tennant, P. and Duggan, F. (2008) *Academic Misconduct Benchmarking Research Project: Part 2*. The Recorded Incidence of Student Plagiarism and the Penalties Applied. UK: The Higher Education Academy and JISC

Tennant, P. and Rowell, G. (2010) *Benchmark Plagiarism Tariff for the Application of Penalties for Student Plagiarism and the Penalties Applied*. UK: Plagiarismadvice.org

TEQSA (2017a). Guidance note on Academic Integrity. (https://www.teqsa.gov.au/latest-news/publications/guidance-note-academic-integrity) [accessed 4th October 2018].

TEQSA (2017b). Good Practice Note on Contract Cheating. http://www.teqsa.gov.au/sites/default/files/media-release-Good-Practice-Note-contract-cheating-oct17.pdf [accessed 18th July 2018].

TEQSA (2017c) Guidance note on Health and Wellbeing. https://www.teqsa.gov.au/sites/g/files/net2046/f/

guidance-note-wellbeing-and-safety-v1-2.pdf?v=1515375436 [accessed 18th July 2018].

TeSLA (nd). *Trust-based authentication and authorship e-assessment analysis*. https://tesla-project.eu/ [accessed 19th November 2018].

The Sunday Telegraph (2011) 'The cheating epidemic at Britain's Universities' 15/03/2011.http://www.telegraph.co.uk/education/educationnews/8363345/The-cheating-epidemic-at-Britains-universities.html [accessed 6th August 2018].

The Times of India (2018). 46 students, 14 teaching staff held for running cheating nexus in pharma institute. https://timesofindia.indiatimes.com/city/dehradun/46-students-14-teaching-staff-held-for-running-cheating-nexus-in-pharma-institute/articleshow/64278201.cms 23rd May 2018. [accessed 18th July 2018].

THE (2017) Dozens of scholars arrested and 300 sacked in Turkey purge. *Times Higher Education* 21st July 2017. https://www.timeshighereducation.com/news/dozens-scholars-arrested-and-300-sacked-turkey-purge [accessed 24th July 2018]

THE (2018a) Turkish academics jailed for almost nine years over 'terrorism'. *Times Higher Education*, 23rd May 2018. https://www.timeshighereducation.com/news/turkish-academics-jailed-almost-nine-years-over-terrorism [accessed 24th July 2018]

THE (2018b) Performing Arts Students 'scared to report abuse'. *Times Higher Education* 19th July 2018, pp9-10.

THE (2018c) Admissions, malpractice, academic fraud and the falsification of evidence in 19 alternative providers in London. *Times Higher Education*, 25th April 2018. https://www.timeshighereducation.com/news/academic-fraud-real-challenge-uks-quality-assurance [accessed 14th August 2018].

The Times (2018). Graduation selfies leading to surge in first-class fake degrees. 11th June 2018. https://www.thetimes.co.uk/article/graduation-selfies-leading-to-surge-in-first-class-fake-degrees-jcq23ql0q [accessed 10th August 2018].

The Times of India (2018a). 46 students, 14 teaching staff held for running cheating nexus in pharma institute. TNN 23rd May 2018. https://timesofindia.indiatimes.com/city/dehradun/46-students-14-teaching-staff-held-for-running-cheating-nexus-in-pharma-institute/articleshow/64278201.cms [accessed 11th September 2018].

The Times of India (2018b). UGC paves way for more accreditation agencies. Times of India, 24th August 2018. https://timesofindia.indiatimes.com/home/education/news/ugc-paves-way-for-more-accreditation-agencies/articleshow/65525352.cms [accessed 11th September 2018].

Transparency International (2013) Global Corruption Report on Education. https://www.transparency.org/gcr_education. October 2013 [accessed 18th July 2018].

Turner, C. (2018) Female teachers are being sexually harassed by Pupils and groped by colleagues. *Daily Telegraph*, UK. 31st March 2018. https://www.telegraph.co.uk/news/2018/03/31/female-teachers-sexually-harassed-pupils-groped-colleagues-figures/ [accessed 18th July 2018].

UK Research Integrity Office (2009). Code of Practice for Research. http://ukrio.org/publications/code-of-practice-for-research/ [accessed 18th July 2018].

UNESCO (2014). Revised Convention on the Recognition of Studies, Certificates, Diplomas, Degrees and Other Academic Qualifications in Higher Education in African States. 12th December 2014. http://portal.unesco.org/en/ev.php-URL_ID=49282&URL_DO=DO_TOPIC&URL_SECTION=201.html [accessed 6th August 2018].

UNESCO, OECD (2005). Guidelines for Quality Provision in Cross Border Higher Education. http://www.oecd.org/education/innovation-education/35779480.pdf [accessed 6th August 2018].

Universities Australia (2018). University Leaders Condemn Political Veto on Research Grants. 30th August 2018. https://www.universitiesaustralia.edu.au/Media-and-Events/media-releases/University-leaders-condemn-political-veto-on-research-grants#.W_UkmjGnzcs [accessed 21st November 2018].

Universities UK (2012). The Concordat to support Research Integrity. https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2012/the-concordat-to-support-research-integrity.pdf [accessed 18th July 2018].

Universities UK (2016). The Concordat to support Research Integrity: A progress report. https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/concordat-research-integrity-progress-report.aspx [accessed 18th July 2018].

Varghese, N.V. (2017). Reviving Higher Education in India, The IIEP Newsletter and Analysis, July 2017, p 11. http://www.iiep.unesco.org/en/reforms-revive-higher-education-india [accessed 29th August 2018].

Verifile (nd). The CV Verification & Background Screening Service. https://www.verifile.co.uk/ [accessed 6th August 2018].

VroniPlag Wiki (nd). http://en.wikipedia.org/wiki/VroniPlag_Wiki [accessed 24th July 2018] .

Walker, S. (2018). Liberal Hungarian university warns Viktor Orbán could force it abroad. The Guardian 15th May 2018. https://www.theguardian.com/world/2018/may/15/central-european-university-ready-to-move-out-of-hungary. [accessed 6th August 2018].

Warren, E. (2016). Rubber Stamps: ACICS and the Troubled Oversight of College Accreditors. U.S. Senate Office. https://www.warren.senate.gov/files/documents/2016-6-10_ACICS_Report.pdf [accessed 6th August 2018].

Watson, R. (2017). Student Loan Scandal. BBC Panorama video recording, broadcast on 13th November 2017. http://www.bbc.co.uk/programmes/b09g5l1c [accessed 12th July 2018]

WCRI (2010) Singapore Statement on Research Integrity: http://www.singaporestatement.org/ accessed 18th July 2018].

WHED (nd). World Higher Education Database. International Association of Universities and UNESCO. http://www.whed.net/home.php [accessed 10th August 2018].

Weber-Wulff, D. (nd) Copy-shake-paste blog: https://copy-shake-paste.blogspot.co.uk/ [accessed 18th July 2018].

Weber-Wulff, D. (2014). False Feathers: A Perspective on Academic Plagiarism. Heidelberg, Berlin: Springer.

Weber-Wulff, D. (2016). Plagiarism in Medical Dissertations in Germany. In Council of Europe (Hrsg.) ETINED - Pan-European Platform on Ethics, Transparency and Integrity in Education, Volume 1, 7th Session of the Prague Forum, p. 65–76, 2016. ISBN 978-92-871-8308-8. http://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168069226a [accessed 9th August 2018].

Wikipedia Deutschland (nd). Akkreditierung (Hochschule). https://de.wikipedia.org/wiki/Akkreditierung_(Hochschule) [accessed 10th September 2018].

Workplacetablet (2017). Discussion Forum: Essay Mill blackmail and extortion scam. https://workplacetablet.com/2017/11/13/the-recent-increase-in-email-based-blackmail-and-extortion-scams/ [accessed 23rd July 2018].

World Bank Group (nd). http://www.worldbank.org/ [accessed 6th August 2018].

Xinhua (2018). Belgium vows to tackle spread of "fake universities". China - Europe 13th June 2018. http://www.xinhuanet.com/english/2018-06/13/c_137249867.htm [accessed 6th September 2018].

Yang, R. (2015) Corruption in China's Higher Educational System: A Malignant Tumour. International Higher Education, Spring 2015, 39, pp 18-20.

Acknowledgements

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Appendices

Appendix 1: List of Acronyms

AACRAO — American Association of Collegiate Registrars and Admissions Officers

ALLEA — All European Academies

AQAB — Accreditation and Quality Assurance Body

AQA NZ — Academic Quality Agency for New Zealand

CDSL — Central Depository Services Limited - Depository based in Mumbai

CHEA — Council for Higher Education Accreditation

CHESICC — China Higher Education Student Information and Career Centre

CIQG — CHEA International Quality Group

CoE — Council of Europe

COPE — Committee on Publication Ethics

DOI — Digital Object Identifier

EGE — Unified State Examination in the Russian Federation

ENAEE — European Network for Accreditation of Engineering Education

ENIC — European Network of Information Centres in the European Region - also see NARIC

ENQA — European Association for Quality Assurance in Higher Education

EQAR — European Quality Assurance Register

ETICO — IIEP-UNESCO - resources for education, ethics, transparency and combatting corruption globally

ETINED — Resources for education, ethics, transparency and combatting corruption in Council of Europe countries

EUS — European Union of Students

GDN — Groningen Declaration Network - organizations offering digital credential verification services

GUNi — Global University Network for Innovation

HE — Higher Education

HECSU — HE Careers Service Unit - UK organization responsible for HEDD

HEDD — Higher Education Degree Datacheck - UK digital qualification verification service

HEFCE — Higher Education Funding Council for England - Now superseded by the Office for Students

HEI — Higher Education Institution

ICAI — International Centre for Academic Integrity

IIEP — International Institute for Educational Planning - Part of UNESCO

KAA — Kosovo Accreditation Agency

KITU — Coalition for integrity and transparency at the University in Kosovo

MEXT — Ministry of Education, Culture, Sports, Science and Technology in Japan

My eQuals — Digital credential system for higher education qualifications in Australia and New Zealand

NARIC — National Academic Recognition Information Centres in the European Union - also see ENIC

NDML — NSDL Database Management Limited - National Academic Depository for India

NGO — Non-Governmental Organization

NHEQF — National Higher Education Qualifications Framework - India

NIH — National Institutes of Health

NZQA — New Zealand Qualifications Authority

OECD — Organisations for Economic and Co-operation development

OfS — Office for Students - UK - founded 2018

ORCA — Organizata për Rritjen e Cilësisë në Arism - Citizens Corps - Higher education watchdog in Kosovo

ORI — Office of Research Integrity - USA

QA — Quality Assurance

QAA — Quality Assurance Agency - England

QQI — Quality and Qualifications Ireland

QRP — Questionable Research Practices

TESQA — Tertiary Education Standards and Quality Assurance Australia

TI — Transparency International

TOEFL — Test of English as a Foreign Language

UKRI — United Kingdom Research and Innovation

UNESCO — United Nations Educational, Scientific and Cultural Organization

WCRI — World Conference on Research Integrity

WHED — World Higher Education Database - Information on HE institutions, systems and credentials

Appendix 2: List of participants in interviews and informal discussions

Policies and Actions of AQABs to Counter Corruption in Higher Education		
Interview participant	**Name of Accreditation or Quality Assurance Body**	**Role**
Prof. Douglas Blackstock	Quality Assurance Agency, UK (QAA)	CEO
Prof. Anthony McClaren	Tertiary Education Standards and Quality assurance, Australia (TESQA)	CEO
Prof. Nora Skaburskiene	Lithuania QAA	
	CEENQA	CEO until 2018
Prof. Ivan Leban	Slovenia QAA	CEO
Dr Vjollca Krasniqi	Kosovo Accreditation Agency	Vice-President State Council (Board) of the KAA
Dr. Xhavit Rexhaj	Kosovo Accreditation Agency	Member State Council (Board) KAA
Dr. Padraig Walsh	Qualifications and Quality Ireland (QQI)	CEO
Interview participant	**Name of organization**	**Role**
Dr. Ivan Oransky	Retraction Watch	Co-Founder
Dr. Herman de Leeuw	Groningen Declaration Network (GDN)	Executive Director
Chris Rea, Jayne Rowley	HE Careers Services Unit (HECSU);	
	HE Degree Datacheck (HEDD), UK	CEO
Prof. Andrei Rostovtsev	Dissernet, Russia	Co-founder
Prof. Debora Weber-Wulff	HTW Berlin, Germany;	
	VroniPlag Wiki	Professor of Computer Science; Academic volunteer- HE corruption
Prof. Tsutomu Kimura (Tom)	National Institute of Technology, Toyota College, Japan	Professor of Information and Computer Engineering,
Dr. Elena Denisova-Schmidt	University of St. Gallen, Switzerland	Professor, publishing on corruption in Russia.
Mr. Jeffrey Beall	Beall's list	Founder
Prof. N.V. Varghese	National Institute of Educational Planning and Administration	Director, Centre for Policy Research in Higher Education (CPRHE)
Dr. Sjur Bergan	Council of Europe	Head of Education Department
Dr. Chris Graf	Committee on Publication Ethics (COPE)	
	Wiley	Co-Chair, voluntary and elected position; Director, Research Integrity and Publishing Ethics
Dr. Vigilijus Sadauskas	Lithuanian Ombudsman's Office	Ombudsman 2013-2018
Ms. Vjosa Rogova-Damoni	Council of Europe	Kosovo Office
Dr. Dukajgin Pupovci	Kosovo Education Center	Education Consultant, Kosovo
Mr. Rron Gjinovci	ORCA, Kosovo	Co-founder and anti-corruption activist

Appendix 3: Survey questions

Showing differences between versions 1 and 2 of the questionnaire.

Version		Participant information
Both	1	I have read the participant information and agree to my responses being used in this survey. Required

Version		About your organisation		
Both	2	What is the name of your organization? (required)		
Both	3	Which of the following describes the main purpose of your organization? (please choose the most appropriate answer)	a. Educational standards and quality b. Approval / authorization of educational programs / courses c. Accreditation of subject-specific programs/professional programmes / courses d. Accreditation of professional programs/courses	
Both	3a	If your organisation is involved with accreditation of subject-specific programs or professional programmes / courses, please clarify which subjects and professions your organisation covers.		
Both	4	Please indicate to what extent your organization is interested in:	a. The regulation of higher education systems b. The teaching role of higher education c. Student assessment d. Student admission and recruitment e. Credentials and qualifications f. Research g. Academic publications	Not part of our remit Minor interest Moderately interested An important aspect Central to our remit
Both	5	Over what area does your organization operate? (please select all that apply)	a. Locally / Regionally a. Locally / Regionally b. Nationally c. Internationally	
Both	5a	Please provide more information about in which parts of the world / countries / regions your organization operates.		
Both	5b	What are the levels of education under your organization's remit (please select all that apply)	a. Pre-or sub-bachelor degree b. Bachelor's degree c. Master's degree d. Doctoral programmes e. Research Others (please specify)	

Version		Corruption in regulation of higher education systems (Q6 optional – can skip this section if not relevant)		
Both	7	What is your organization's view about the current situation in different higher education regulatory bodies that are operating in the same domain as your organisation (for example AQABs, local and national government bodies) relating to the following aspects of corruption and academic integrity breaches?	a. Bribery to influence decisions b. Ignoring conflicts of interest c. Unfair practices in appointment of officials (eg through nepotism or favour) d. Political or commercial interference in regulatory decisions	Not applicable No concerns It is under control Minor concerns Serious concerns It is a major problem
	7a,b	Other types of corruption in regulatory bodies causing concerns. Further details (text answers)		
Both	8	What kinds of measures or actions are available to your organization to address these kinds of problems and influence positive change?	a. Highlighting problems in communications or reports b. Recommending changes c. Demanding changes d. Awarding a low accreditation score e. Refusing license to operate	Not applicable No available actions Can highlight problems in Communications or reports Can recommend changes Can demand changes Can award a low Accreditation score

V1 only	9	How frequently have actions of this type been taken by your organization?	a. Highlighting problems in communications or reports b. Recommending changes c. Demanding changes d. Awarding a low accreditation score e. Refusing license to operate	Not applicable Never Rarely Occasionally Regularly Frequently
V2 only	9	How often have the following actions been seen during the work of your organization?	a. Bribery to influence decisions b. Ignoring conflicts of interest c. Unfair practices in appointment of officials (eg through nepotism or favour) d. Political or commercial interference in regulatory decisions	Not applicable Never Rarely Occasionally Regularly Frequently
Both	9a	Please provide examples of actions taken and how recently this happened.		
Both	9b	What more do you think could be done to prevent corrupt practices in regulatory bodies?		
Version	**Corruption and academic integrity breaches in higher education teaching (Q10 optional – can skip this section if not relevant)**			
Both	11	Based on recent evidence from the activities of your organization, what concerns does your	a. Recruiting/promoting academic and other staff on the basis of bribes, favouritism or influence peddling. b. Absent instructors who do not fulfil their scheduled obligations. c. Harassment of staff d. Harassment of students e. Altering student marks in return for sexual or other favours. f. Administrative pressure on academics to alter marks for institutional convenience.	Not applicable No concerns It is under control Minor concerns Serious concerns It is a major problem
Both	11a	Other aspects of corruption in higher education teaching causing concerns, Further details		
Both	12	What kinds of measures or actions are open to your organization to try to bring about positive change in teaching practices?	a. Recruiting/promoting academic and other staff on the basis of bribes, favouritism or influence peddling. b. Absent instructors who do not fulfil their scheduled obligations. c. Harassment of staff d. Harassment of students e. Altering student marks in return for sexual or other favours. f. Administrative pressure on academics to alter marks for institutional convenience.	Not applicable No available actions Can highlight problems in Communications or reports Can recommend changes Can demand changes Can award a low Accreditation score
Both	13	How often have the following actions been seen during the work of your organization?	a. Recruiting/promoting academic and other staff on the basis of bribes, favouritism or influence peddling. b. Absent instructors who do not fulfil their scheduled obligations. c. Harassment of staff d. Harassment of students e. Altering student marks in return for sexual or other favours. f. Administrative pressure on academics to alter marks for institutional convenience.	Not applicable Never Rarely Occasionally Regularly Frequently
Both	13a	Please provide examples of actions taken and how recently this happened.		
Both	13b	What do you think could be done to prevent corrupt practices in higher education teaching?		

Version		Corrupt practices in higher education admissions and recruitment (Q14 optional – can skip this section if not relevant)		
Both	15	What is your organization's level of concern with the following corrupt practices in higher education admissions and recruitment?	a. Exceeding enrolment limits set by governments and regulatory bodies. b. Misleading advertising for recruitment. c. Bribery of admissions staff or recruitment agents. d. Falsified transcripts and/or fake recommendation letters. e. Cheating in admissions tests.	Not applicable No concerns It is under control Minor concerns Serious concerns It is a major problem
Both	15a	Other types of responses to corrupt practices, further details		
Both	16	What kinds of measures or actions are available to your organization to address these kinds of problems and influence positive change?	a. Exceeding enrolment limits set by governments and regulatory bodies. b. Misleading advertising for recruitment. c. Bribery of admissions staff or recruitment agents. d. Falsified transcripts and/or fake recommendation letters. e. Cheating in admissions tests.	Not applicable No available actions Can highlight problems in Communications or reports Can recommend changes Can demand changes Can award a low Accreditation score
V1	17	How Frequently have actions of this type been taken by your organization related to admissions and recruitment?	Not applicable No available actions Can highlight problems in communications or reports Can recommend changes Can demand changes Can award a low Accreditation score	Not applicable Never Rarely Occasionally regularly Frequently
V2	17	How often have the following actions been seen during the work of your organization?	a. Exceeding enrolment limits set by governments and regulatory bodies. b. Misleading advertising for recruitment. c. Bribery of admissions staff or recruitment agents. d. Falsified transcripts and/or fake recommendation letters. e. Cheating in admissions tests.	Not applicable Never Rarely Occasionally Regularly Frequently
Both	17a	Please provide examples of actions taken and how recently this happened.		
Both	17b	What more do you think could be done to prevent corrupt practices in regulatory bodies?		
Version		Corruption and academic integrity breaches in higher education student assessment (Q18 optional – can skip this section if not relevant)		
Both	19	What level of concern does your organization have with each of the following aspects of corruption and academic integrity breaches relating to student assessment in higher education institutions?	a. Availability of leaked exam papers or exam- related material b. Contract cheating / use of essay mills / ghost writing of assignments c. The proliferation of contract cheating companies d. Bribery of invigilators/proctors and markers e. Impersonation of candidates in examinations f. Plagiarism and cheating in continuous assessment, assignments g. Cheating in formal examinations	Not applicable No concerns It is under control Minor concerns serious concerns It is a major problem
Both	19a	Other types of corruption and academic integrity breaches in student assessment that are of concern, Further details		

Both	20	What kinds of measures or actions are open to you to try to bring about positive change relating to student assessment in higher education?	a. Availability of leaked exam papers or exam- related material b. Contract cheating / use of essay mills / ghost writing of assignments c. The proliferation of contract cheating companies d. Bribery of invigilators/proctors and markers e. Impersonation of candidates in examinations f. Plagiarism and cheating in continuous assessment, assignments g. Cheating in formal examinations	Not applicable No available actions Can highlight problems in Communications or reports Can recommend changes Can demand changes Can award a low Accreditation score
Both	21	How often actions of this type seen in the course of the work of your organization?	a. Availability of leaked exam papers or exam- related material b. Contract cheating / use of essay mills / ghost writing of assignments c. The proliferation of contract cheating companies d. Bribery of invigilators/proctors and markers e. Impersonation of candidates in examinations f. Plagiarism and cheating in continuous assessment, assignments g. Cheating in formal examinations	Not applicable Never Rarely Occasionally Regularly Frequently
Both	21a	Please provide examples of actions taken and how recently this happened.		
Both	21b	What do you think could be done to prevent corrupt practices in relation to student assessment in higher education?		
Version	**Corruption and academic integrity breaches in the award of higher education credentials and qualifications (Q22 optional – can skip this section if not relevant)**			
Both	23	What level of concern does your organization have with each of the following aspects of corruption and academic integrity breaches in the award of higher education credentials and qualifications?	a. Use of degree mills and accreditation mills b. Falsification of transcripts and degree certificates. c. False statements about qualifications on CVs and job applications. d. Political pressures on HEIs to award academic degrees to public figures. e. Political pressures on HEIs to award honorary degrees to public figures.	Not applicable No concerns It is under control Minor concerns Serious concerns It is a major problem
Both	23a	Other aspects of corruption in the award of higher education credentials and qualifications causing Concerns; Further details.		
Both	24	What kinds of measures or actions are open to your organization to try to bring about positive change in the award of higher education credentials and qualifications?	a. Use of degree mills and accreditation mills b. Falsification of transcripts and degree certificates. c. False statements about qualifications on CVs and job applications. d. Political pressures on HEIs to award academic degrees to public figures. e. Political pressures on HEIs to award honorary degrees to public figures.	Not applicable No available actions Can highlight problems in Communications or reports Can recommend changes Can demand changes Can award a low Accreditation score

Both	25	How often are actions like this seen during the work of your organization?	a. Use of degree mills and accreditation mills b. Falsification of transcripts and degree certificates. c. False statements about qualifications on CVs and job applications. d. Political pressures on HEIs to award academic degrees to public figures. e. Political pressures on HEIs to award honorary degrees to public figures.	Not applicable Never Rarely Occasionally Regularly Frequently
Both	25b	What do you think could be done to prevent corrupt practices in the award of higher education credentials and qualifications?		
Version	**Corruption and academic integrity breaches in academic research and publication (Q26 optional – can skip this section if not relevant)**			
Both	27	What level of concern does your organization have about each of the following aspects of corruption and academic integrity breaches in academic research and publication?	a. Presentation of manuscripts translated from other languages as original work. b. Publication by supervisors of research by graduate students without acknowledgement. c. Suppression of rival work by journal reviewers. d. Fabrication of data or results. e. Plagiarism in academic publications f. Suppression of inconvenient research results by commercial and other interests	Not applicable No concerns It is under control Minor concerns serious concerns It is a major problem
Both	27a	Other aspects of corruption in academic research and publication causing concerns		
Both	28	What kinds of measures or actions are open to your organization to try to bring about positive change in academic research and publication?	a. Presentation of manuscripts translated from other languages as original work. b. Publication by supervisors of research by graduate students without acknowledgement. c. Suppression of rival work by journal reviewers. d. Fabrication of data or results. e. Plagiarism in academic publications f. Suppression of inconvenient research results by commercial and other interests	Not applicable Never Rarely Occasionally Regularly Frequently
Both	29	How frequently have you observed in the course of the work of your organization?	a. Presentation of manuscripts translated from other languages as original work. b. Publication by supervisors of research by graduate students without acknowledgement. c. Suppression of rival work by journal reviewers. d. Fabrication of data or results. e. Plagiarism in academic publications f. Suppression of inconvenient research results by commercial and other interests	Not applicable Never Rarely Occasionally Regularly Frequently

Both	29a	Please provide examples of actions taken against corruption in academic research and publication and how recently this happened.
Both	29b	What do you think could be done to prevent corrupt practices in academic research and publication?
Version		**Countering different forms of corruption and academic integrity breaches in higher education**
V2	30	How often have actions of this type been taken by your organization in response to evidence of corruption?	a. Highlighting problems in communications or reports b. Recommending changes c. Demanding changes d. Awarding a low accreditation score e. Refusing license to operate f. Other (please specify)	Not applicable Never Rarely Occasionally Regularly Frequently
V2	30a	Please provide examples of any other actions taken and say how recently this happened.
V2	30b	What more do you think could be done to prevent corrupt practices in regulatory bodies?
V1 V2	30 31	Please provide information about actions your organization is planning that will address different forms of corruption and breaches to academic integrity. Some suggestions are listed, but please add to these using the free-format comment box below	Develop new standards Develop new policies Develop guidance for higher education providers Consult with higher education providers Consult with other organizations Other (please specify)
V1 V2	30 31	What is your organization's view on the overall situation relating to corruption and academic integrity breaches in higher education in your part of the world?	a. Nothing is being done b. A slow or weak response c. Some impact but more effort is needed d. The main problems are being addressed e. The response is very effective
V1 V2	32 33	Which other organizations are actively addressing corruption or academic integrity breaches in higher education in your part of the world?
V1 V2	33 34	Please provide any further information relating to corruption and academic integrity breaches not covered by the survey questions
V1 V2	34 35	Please provide views from your organization about what more should be done to address any problems you identified
V1 V2	35 36	If your organization would like to be involved in more in-depth research, or if you have further information you would like to share with us, then please provide an email address to allow us to contact you.
Both		End of questions- Thank you for completing this survey.

Appendix 4: Additional feedback from respondents to the questionnaire

Question 7: Additional feedback about corruption in the regulation of higher education
•Use of fake accreditation seals - some of our members are from countries which have not a long tradition of transparency.
•Lack of transparency in some AQABs - lack of sufficient understanding and acceptance of conflicts of interest.
•Some AQABs do not look critically into corruption in governance of institutions or plagiarism issues - professional accreditation agencies coming over from North America.
•Diploma mills issuing similar or identical credentials - certain US states allow diploma mills and accreditation mills to operate.
graduates … not having full practice authority at a state level.
•Conflicts of interests embedded in council or governance bodies.
specific cases there were concerns regarding the ability of some agencies to act autonomously and assume full responsibility for [its] operation.
•Regarding c. Unfair practices in appointment of officials (e.g., through nepotism or favour) there is no concern of nepotism; however, political affiliations affect the appointment of officials.
•Commercialization of HE through privatization.
private sector in HE in the whole … region is the source of corruption.
•HEIs in public sector are covered by Integrity and Prevention of Corruption Act and by-laws, but this is not so strict in private sector (eg. nepotism and appointment of officials)
•Change of the Law on HE issued in October 2017 introducing the strong influence of the government to the bodies involved in QA

Question 8: Additional feedback about responses to corruption in the regulation of higher education
•Licenses are refused when institutions are not compliant with the requirements set by our organization.
•Putting the whole institution or one or more of its programs on Probation, with ceasing admission of new students
•Publication of good practice guidelines Signature of a good conduct charter by the agencies
•Provided info to a regulatory board regarding diploma mill naturopathic credentials. A year ago or so.
•The Register Committee will either decide that the agency is complying only partially with the standard or not complying with the standard, i.e., independence … . As a rule, a conclusion of no compliance for any one standard prevents an overall judgement of substantial compliance, and therefore the agency cannot be registered with [my organization].
•As Accreditation Council, we recommend to take actions that counteract the bad practices that tend to corruption in regulation of higher education systems. This is through the opinion document delivered to the Institutions.

Question 9: Suggestions about tackling corruption in the regulation of HE
•Most of the corruption is in relaxation of admission requirements, and giving credits to transfer courses taken at other institutions.
•Fraudulent academic credentials - A small % of institutions lead to the concerns noted.
•Teacher-student intimate relationships which may lead to favouritism - It is more likely to happen with young teaching staff.
•Promote quality seals.   Open channels to report bad practices.
•Ensure that professional staff of regulatory bodies do not have any

previous relations with HEIs under their jurisdiction
… nationwide awareness campaigns about diploma mills.
•To appoint officials who have integrity and commitment to uphold what is right. To have processes in place and make these processes transparent to stakeholders.
1. Operate with user friendly QA systems and guidelines to reduce bureaucracy.   2. Empower higher education systems. 3. Impose severe punishments.
•More transparency, i.e., publication of reports, a monitoring system where regulatory bodies inform of any major changes in their activities and practices, ensuring each of these regulatory bodies has (and respects) an Integrity Code.
•Would be good to have a body in charge that could receive all kind of complaints done by the society about the bad practices that one agency could have done.
•Enabling complete independence of QA bodies from governmental influence and restructuring private sector of HE.

Question 13: Additional comments on corruption in teaching
•Pressure on faculty to pass higher portion of students, in private institutions - Apply tougher sanctions on institutions.
•Notable degree of plagiarism.
•As a small academic community and a country with low inter-country mobility of citizens, [my country] has a problem with academic inbreeding - own students are preferred for future employment and favoritism in that sense is a rule. The Agency typically gives recommendations to widen the pool of applicants and change such practices - A legal change would be necessary to fully put an end to this practice.
•Faculty and student manuals should be published and widely distributed.
•Institutions should have the necessary processes to ensure the safety of staff and students.
•When a large percent of students fail a subject, standardization may be imposed by higher authorities - 1. Put reliable system for reporting such incidents; 2. Strong monitoring and evaluation devolved to lowest operational levels; 3. Education to inculcate QA culture; 4. Strong punishment.
•Stories about student harassment in the News are solved by the institutions themselves.
•We operate anonymous complaints systems for staff or students to flag these issues. We have not received one complaint in the past year.
•The Agency do interviews to teachers, students and administrative people. Also we evaluate that into the institution have to be a special area to treat all this kind of trouble, when we detect that something is not normal. We take it into account and in the report delivered we established the recommendation of change, we cannot force or demand changes, since we are not the institution in charge to do so - Could be a collaboration with external authorities, in which the person that has an affection in topics such as harassment, make a direct delation (sic), in that way there is no place to cover the situation
•Ensuring that all agencies have a no tolerance approach to these corrupt practices and when identified, then reporting to the appropriate agency is done and followed up on.

Question 15: Additional feedback on corruption in admissions and recruitment

•The main issue in [this county's] universities is with international students and their agents - falsifying transcripts and other admission documentation or cheating in admission tests.

Question 16: Additional feedback on available measures against corruption in admissions and recruitment
•Have two institutions on probation for not adhering to admission requirements (Sept 2017) Putting a whole institution on probation with stop of admission for its role in falsifying TOEFL Scores (Oct 2017)
•Low accreditation scores are in the context of an academic audit. All [this country's] universities have committed to be bound by academic audit findings. These findings include recommendations which are to be addressed by universities.
•While there are no Government-set quotas, the Agency very often recommends to institutions to decrease them.
[My organization's] Standards require accurate recruitment information; when an accredited site violates this, a correction is required. Re admissions tests, test providers in our field monitor firm identification of test takers and address the problem when it occasionally comes up.
•Standard 3 of the Accreditation Manual addresses the need for student policies that are consistently applied including admission, testing, and advertisement.
•The Agency evaluate everything is established above. In the case of "Exceeding enrollment..." we have that preoccupation with public institutions, mainly in the principal States of [this country], such as [the capital] City, in which the demand is huge and for the same reason there is overpopulation in the Institutions. We check the infrastructure (classrooms) of the institutions and compared it with the number of student per each subject. If we detect that there is an overpopulation, we make a recommendation. Also it makes that the institution get a lower score.
•Any corruption in admissions was ended by the introduction of a centralized application system in [this country] based on standardized graduation tests; this system is administered by our Agency. The ENIC/NARIC office of the Agency monitors misleading advertising and informs potential applicants, and offers support to institutions in identifying falsified transcripts.
•Subject the regulatory bodies to external reviews.
•The Ministry and HEIs are responsible for that. Ministry should have an Inspectorate and we should need also independent student ombudsman.

Question 20: Additional Feedback on the measures available to AQABs for corruption in assessment
•TEQSA has developed guidance material for higher education providers around addressing contract cheating and maintaining academic integrity (published in 2017).
•Provision of contract cheating services is illegal under NZ law.
•The QAA released its report "Contracting to cheat in higher education" in October last year. This report made a series of recommendations for HE providers in enhancing academic integrity.
Indeed this kind of problems are reviewed and regulated inside of the institution. It is difficult to us to see this corrupt actions, since we see a general panorama of how the students are evaluated, and check the existence of internal regulations
•Again related to Standard 3 and upholding policies consistently within the nursing programs. Includes having grievance/complaint policy whereby students receive due process when applicable.
•When problems are detected regarding the potential effectiveness of the policy with regard to how the college handles plagiarism, our organization may issue recommendations in a report that is made public and delivered to the minister. Following these recommendations, the institution is required to respond. In addition, the [organization] also conducts audit visits at the end of which recommendations may also be issued.
•Request for the administration of distance learning exams to be in secure location.

Question 21: Further comments about addressing corruption in assessment:
•In [South Eastern European country], bribery in assessment was tackled by a number of police actions and seems to be under control; cheating is seen as culturally acceptable, however, institutions are taking strong measures to combat it. A number of commercial assignment-writing companies have appeared and detecting such practices will be a concern in the next accreditation cycle. Inconsistencies in grading are a major concern and a topic in the next accreditation cycle as institutions need to introduce mechanisms to improve consistency of grading [serious / minor concerns].
•Notable degree of plagiarism [Middle East, Major / minor concerns]
•Accredited sites document how they ensure firm ID of students taking exams. Sites must provide evidence that exams are held securely. Except for the issues faced by the external English exam companies/providers in some countries, cheating isn't a significant problem at accredited sites [operating internationally, no concerns].
•In [central America] in general [minor concerns].
Education providers have responsibility for this [European country, no concerns].
•Our organization ensures that the teaching institutions have policies and regulations that ensure the fairness and justice of the assessment of learning, which includes regulations governing plagiarism and fraud and we ensure that policies are duly applied. However, we leave it up to the institutions to apply these rules [North America, minor concerns].
•An international approach is vital. Suppliers of contract cheating materials operate without regard to borders, and solutions must do the same. National governments can play a central role in helping to co-ordinate and support such international efforts. [Europe, serious concerns].

Question 24: Additional responses about available measures to counter corruption in credentials and qualifications
•We pursue companies offering these services legally where we can and work with universities to discipline students using these services.
•… this is not the job of the QA section of the Agency but the ENIC/NARIC office which regularly checks the validity of credentials and issues information on degree and accreditation mills when they appear in [this country].
•[Regarding visa mills, we] report any possible irregularities to the … government.
•The scope of our work doesn´t allow us to determine these kind of conducts of the institutions, since we evaluate just the quality of the program. These kind of conducts must be regulated and watched by educational authorities, so they can audit what the institutions are delivering and if they do so because the requirement to get the degree were fulfilled.
•Most fake diploma come from "on line" institutions with validation of professional experience. Standards should be drafted for such training methods.

Question 28: Additional feedback on available measures against corruption in research and publication
•The Agency is demanding changes whenever talk of practices of signing students' work or plagiarism appear; the Agency also coordinates the national Ethics Committee as the umbrella/second-instance body for such cases.
•We know about the existence of this kind of troubles in the matter of research. If we have the chance to know it, with the interviews made. We just can recommend some actions, and the institution gets a low grade. There are special instances in [this country] that support research and this Organization is in charge to supervise that all the requirements are fulfilled, such as it is an original work. Nonetheless, there has to be tough punishments if it is detected.

Questions 30 (Version 1) and 31 (Version 2): Additional feedback on available measures to address corruption in general
•EQAR will establish a database of results (i.e., reports and decisions) from external quality assurance procedures in line with the ESG, by EQAR-registered agencies, in order to enhance their accessibility. This will allow users to access information and reports on institutions and their quality assurance. By publishing this "white list" EQAR will try to promote transparency and trust. It is not in the remit of an international organisation like EQAR to remove authorisation of national education providers, since education is a national competency.
•Conducting unannounced on-site investigations, communicating and sharing information with other regulatory bodies.
•More legal protections for accreditors; accreditors in the US are generally small and non-profit, and can't afford repeated expensive lawsuits. But frequently, punishing a corrupt school results in frivolous litigation from the corrupt entity, wasting accreditor time and resources.
•The commissioners are constantly looking at our Essentials, and how to continue best serving the student and the institutions we accredit.
•Strong penalty;. Training and sensitization; Strengthen monitoring and evaluation.
•CEA already has and implements policies and standards to address the various aspects of corruption and academic integrity outlined in this survey. When a particular issue becomes a pattern or rises to the level of a theme (plagiarism among certain groups of students, evidence that a school is a "visa mill") we take appropriate action. CEA is a member of ASPA and would consult with other accreditors if necessary. Violations of federal law are reported to the US government.

Questions 32 (Version 1) and 33 (Version 2): Suggestions for other activities and measure:
•Conducting unannounced on-site investigations.
•Communicating and sharing information with other regulatory bodies. [My organization] already has and implements policies and standards to address the various aspects of corruption and academic integrity outlined in this survey. When a particular issue becomes a pattern or rises to the level of a theme (plagiarism among certain groups of students, evidence that a school is a "visa mill") we take appropriate action. [My organization] is a member of ASPA and would consult with other accreditors if necessary. Violations of federal law are reported to the US government.
•Develop new legislation.
•The commissioners are constantly looking at our Essentials, and how to continue best serving the student and the institutions we accredit
•Develop strict standards, Strict penalties

Sensitization and advocacy
•Sharing of information globally is highly recommended.
•New legislation is being introduced that will make public both institutions and individuals who misrepresent their qualifications or have fraudulent qualifications.
•Continuous improvement of education standards and operational policies of accreditation agencies to respond to the changing educational environment.
•We are in the process of introducing plagiarism checking software to all institutions, publishing all theses online and introducing other legislative changes which will discourage corruption.
•Implement tougher actions, and more rigorous policies Establish a system of exchange information among QAAs
•Quality assurance agencies should establish the system of counter academic corruption.
•Public databases of certified degree diploma and of certified institutions

Absence of evidence
•This has not been an issue with our agency, so there are no actions we are currently contemplating.
•The types of corruption identified in this survey are not an issue with the programs that we accredit.
•National legislation should address this issue.
•Corruption and integrity breaches never noted.

Questions 33 (version 1) and 34 (version 2): Remaining concerns and observations from questionnaire respondents
•Our main concern is how to be informed about our member agencies misconduct (if any).
•Do we have a list of Fake Accreditation Agencies?
•Internet should provide the list of "fake agencies and HEIs" in separate states. [This] state is very small and it is not applicable in it.
•The main reason why there is widespread corruption in scientific research is because so much of it is financed by industry; e.g., research into the harms caused by GMOs, vaccinations and new drugs. Scientific research needs to be funded by entities without a financial stake in the results.
•The challenge of suppressing corruption should be pointed out also at primary and secondary schools - not to leave to reach the universities.
•There is a cultural change taking place in [this country] and probably neighboring countries, because publishing in in-house journals, hiring own students (spending a whole career at a single institution) and faulty citation practices have all been a cultural norm which now needs to be changed.

Appendix 5: Literature review

A5.1 Key literature sources

The two key publications that justify the commissioning of this study are Transparency International's (TI) report on corruption in education (2013) and the more recent *Advisory Statement on Corruption in Higher Education* (IIEP & CIQG 2016). The TI report highlighted how widespread and diverse corrupt practices in education have become, implicating every country in the world to some extent. The TI country-by-country summary highlights evidence identifying the main priorities (TI 2013). In preparing the *Advisory Statement*, IIEP & CIQG (2016) drew on evidence from an expert panel, academic research and media reports to confirm how serious and widespread the situation has become across the globe.

Available evidence in the literature about the seriousness and prominence of corruption in education and research varies greatly depending on region and country. However, corruption appears to affect all academic disciplines and is apparent at all levels of education and research.

For this new literature review, building on and updating the work by IIEP & CIQG, relatively little scholarly literature was located that specifically links the role of AQABs to actions for countering corruption. However there continues to be a great (and rapidly increasing) abundance of literature to verify the extent of diverse forms of corruption threatening higher education and research in different parts of the world.

As with the report by IIEP & CIQG, much of the key evidence comes from non-academic sources, such as investigative journalism and watchdogs (for example, Retraction Watch, PubPeer), in the form of videos, radio broadcasts, newspaper reports and blogs. The higher education sector globally, and particularly researchers into corruption in HE, are becoming increasingly indebted to journalists and activists for highlighting, collecting and exposing important evidence about practices undermining quality, standards and integrity of HE (for example, BBC Radio 4 2018; BBC Panorama 2017; Fox News 2018; Besser & Cronau 2015). Research of this nature would be unlikely to be granted academic ethical approval, and journalists can investigate and publish their articles in a much shorter time frame than researchers.

Public naming and shaming can create a powerful trigger for driving reflection on overdue reviews of policies and practices, as observed in an interview with Okebukola about recent efforts to fight corruption in education in Africa by organizations such as the Anti-Corruption Academy of Nigeria and GUNi-Africa (O'Malley 2017a) and in publicity about the work of academics in Germany in revealing plagiarism in doctoral theses (VroniPlag Wiki nd). However, public exposure of vulnerabilities within HE providers and quality assurance mechanisms may have negative impacts, undermining public trust in higher education and HE providers, which can take time and effort to repair. Fear of public exposure can also lead to less transparency, when corruption is covered up or evidence destroyed.

In addition to AQABs and education departments operating at national and local levels, the work of many international and regional organizations and non-governmental organizations (NGOs) is very valuable, not only in identifying problem areas, but also in taking action to raise awareness, shake up complacency and encourage changes to combat corruption.

Evidence from all reliable sources is important to this research because it helps to establish the widespread and varied nature of corruption in higher education, in terms of geography, subjects, academic levels and types of behavior, which can help to inform guidance to AQABs on ways to respond.

A5.2 Literature on different types of corruption

This part of the literature review is organized according to the six categories of corruption listed earlier (IIEP & CIQG 2016). Each section summarizes sources of recent information on that topic and refers to any evidence of research undertaken.

However, these six forms of corruption are strongly interlinked. For example, corruption in the process of appointing staff, at any level, reduces accountability, which impacts on the quality of teaching, admissions and recruitment, assessment, research and publication, potentially leading to further forms of corruption. Therefore where a source of information covers more than one category, only one has been selected for detailed discussion.

A5.2.1 Regulation of higher education systems

Regulatory systems are essential for safeguarding the reputation of the HE sector as a whole, regionally and nationally. If the regulation process itself is flawed or questionable, then trust placed in the quality and standards of the AQAB, and of institutions accredited by this body, is undermined.

Recent examples of the types of corruption in regulation of higher education identified by IIEP & CIQG (2016) include:

- Bribery or favours to grant accreditation (for example, Abd El Galail 2015; Fursova & Simons 2014);
- Corruption in the appointment of institutional leaders or unqualified panel members, though bribery, nepotism, favouritism or with no regard to due process (for example Mohamedbhai 2016; Yang 2015; Rostovtsev 2015, 2017).
- Political or commercial interference to influence decisions of AQABs (for example Prishtina Insight 2017; Balkan Insight 2018; Kreightbaum 2018).

Political interference in higher education appointments and policies can be a great threat to the autonomy of HE institutions (Walker 2018), but in some countries this can be viewed by some as the legitimate way to regulate HE providers, such as in Russia (Rostovtsev 2015) and China (Cyranoski 2018).

Political interference in the activities of AQABs can impede the efforts to limit corruption in HE. The acting director and the whole board of the Kosovo quality assurance agency, KAA, were dismissed by the Kosovan Minister for Education in 2017 (Prishtina Insight 2017). The main evidence against the board was a significant number of programme closures and accreditation refusals on the grounds of poor quality. This led to the KAA being suspended from the European Quality Assurance Register for Higher Education (EQAR) in March 2018 (Pristina Insight 2017, Balkan Insight 2018). However, accusations persist about lack of transparency and the nature of the malpractice of which the KAA was accused, which in turn has led to suggestions of political interference (Balkan Insight 2018).

In addition to political interference, HE may be subject to the same financial corruption that is sometimes found in large institutions. Financial irregularities have been the subject of some recent reports about corruption in HE. For example, a university rector in Vladivostok was charged with abuse of authority after financial irregularities estimated at $260,700 (Osipian 2016). A second example involved both undeclared conflicts of interest and mismanagement of public funds at the University of Bath, UK. The Vice Chancellor was then the highest paid university leader in the UK. After an investigation by the Higher Education Funding Council for England (HEFCE) 13 recommendations were made for improvements to the governance arrangements of the university's remuneration committee for senior staff pay and the university court, including calls to resolve conflicts of interest and lack of transparency (Adams 2017; HEFCE 2017).

Some instances of poor quality result from regulatory systems that do not have the resources to monitor higher education following huge and rapid expansion of the sector. For example, in India, recent efforts to expand quality control indicate recognition of the scale of their problem. Now the second largest higher education sector in the world (after China), India has introduced a system of internal institutional quality assurance and scrutiny

by external quality assurance agencies for public HE providers. However, the majority of private HE providers in India, which now account for over 60% of the entire HE sector, remain unaccredited and therefore unaccountable in terms of quality and standards (Varghese 2017). To address the growing disillusionment in graduate skills and the quality and standards of qualifications, the government in India is developing a National Higher Education Qualification Framework (NHEQF) (Varghese 2017). There are good indications that the Indian government is beginning to address the shortfall in capacity for higher education accreditation, with an announcement in August 2018 about the appointment of an Accreditation Advisory Council with the aim of increasing the "number of accreditation and assessment agencies for higher education in the country" (The Times of India 2018b).

The *Times Higher Education* (THE) reported on an example of a UK AQAB taking action when corruption was found in 19 Alternative HE providers, when accusations of fraud, malpractice and misrepresentation led to investigations by UK's Quality Assurance Agency (THE 2018c). This news report indicated that some of these institutions had recently been granted approval to operate by QAA, which suggested the need for an internal review (QAA 2018b).

Most AQABs provide a framework comprising a set of standards and guidelines that are used to advise and direct policy for HE providers. The standards are also used to measure compliance with expectations and requirements, typically by institutional audit and/or self-assessment. Documents available globally were too numerous to review in their entirety for this study, and not all are available in English, so a few examples are used to illustrate useful approaches taken by AQABs and how the documentation is supplemented to address specific issues, as the need arises.

The Australian Tertiary Education Quality and Standards Agency (TEQSA) provides a comprehensive set of information on-line for different stakeholders in the higher education sector. In addition there are supplementary guidance notes and good practice notes, summarising consultations and studies conducted on different topics. TEQSA draws on specific expertise in the HE sector nationally to inform the contents of these guidance documents.

The UK's Quality Assurance Agency (QAA) also operates in close collaboration with the higher education sector it serves. The central standards document is the Quality Code (QAA 2015, 2018), combined with subject benchmarking statements. The Quality Code is currently under review in consultation with HE providers nationally, with the new Code due for publication in November 2018.

Conclusions from a survey of 27 EU countries published in 2013 encouraged "all national agencies and leaders of HEIs throughout Europe to initiate reviews based on the advice from this research to strengthen policies and procedures for assuring quality and academic integrity" (Glendinning 2013: 39). The survey for the EU-funded project, Impact of Policies for Plagiarism in Higher Education Across Europe (IPPHEAE), found very little awareness or actions by AQABs in the countries studied, for addressing academic misconduct and plagiarism in higher education (IPPHEAE 2013-15). A second similar survey for the South-East European Project on Policies for Academic Integrity (SEEPPAI), funded by the Council of Europe and conducted by some of the same team in 2016-17, covered six more European countries (Foltýnek et al. 2017). Quite serious examples of corruption in higher education were encountered during both of these investigations. For example, many cases were found of teachers receiving payment in return for preferential treatment and essay writing services were found to be common (Ibid, 50-52). Very similar conclusions were drawn from this more recent research about the lack of measures and responses from AQABs, leading to the following recommendation:

> "National governments, through their education ministries and accreditation and quality agencies, should proactively provide oversight for, and guidance in, strengthening policies and procedures for academic integrity in higher education institutions as a crucial component of quality assurance" (Foltýnek et al. 2018: 41).

Despite the introduction of standards, such as the European Standards and Guidelines (ESG), varying standards across the HE sector is an issue that applies to higher education globally. There are no globally applicable benchmarks or standards for higher education. Inconsistency in standards within one country happens where there is a strong culture of autonomy and lack of robust internal and external quality assurance, such as in Germany. Despite the long-standing Bologna Process, launched by the 1999 Bologna Declaration, higher education standards in the European Higher Education Area countries and EU member states are far from uniform (Glendinning 2016: 7).

Some types of corruption described above are beyond the control of AQABs, particularly government interference. However, AQABs should be taking regular action to review and strengthen their own policies and procedures, ensuring the example they set is beyond reproach (for example, in appointment of panel members; declaring and avoiding conflicts of interest; enforcing a strict anti-bribery regime) .

Accreditation mills operate on the basis of deceiving potential students and their families about the quality of the educational services provided by HE institutions they endorse, potentially leading to financial and personal loss. AQABs have a role to play in helping to highlight (to government) any such organizations they encounter and, where possible, take steps towards having them closed down.

A5.2.2 The teaching role of higher education

Recent examples of corruption in teaching that align with the definition in the Advisory Statement include:

- Recruiting/promoting academic and other staff on the basis of bribes, favouritism or influence peddling (Mohamedbhai 2016; ORCA 2017a, 2017b; Denisova-Schmidt 2017; Yang 2015).
- Absent instructors who do not fulfil their scheduled obligations (Mazodier et al. 2012; Schultheiss 2018).
- Sexual or other harassment of staff and students (Atuhaire 2018; Kigotho 2013; Maina 2015; McKie 2018; Turner 2018).
- Altering student marks in return for sexual or other favours (Amadi & Opuiyo 2018); BBC News 2015; McKie 2018; Spooner 2018).
- Administrative pressure on academics to alter marks for institutional convenience (Forrest 2018).

Additional examples of corruption found in recent literature:

- Academics working as ghost writers or for "essay mills" (Healey 2018).
- Lack of respect for whistle-blowers (Pinchuk & Coalson 2018).
- Student grades being altered by administrators without authorisation (Smith 2018).

Examples of corruption in teaching can relate to any level of education and any country. For example an admissions officer in Australia (Besser & Cronau 2015), master's degree programmes in Egypt (Abd El Galail 2015), PhD students in China (Yang 2015), doctoral candidates in Eastern Europe (Slovak Spectator 2016), university president in Russia (Osipian 2016), a report of misuse of university property in the USA (Downes 2017) and school teaching staff in UK (BBC News 2018b).

A paper by Yang condemned the situation in China, where academic promotion was said to be subject to personal connections and favouritism (Yang 2015). The process for academic promotion remains the subject of interest in several other countries, especially where the number of academic publications, not necessarily taking into account the quality of the papers, is a determining factor for professorial positions, such as in Kosovo (ORCA 2016, 2017a, 2017b). In their reports and in press releases and briefings, a coalition of interested NGOs (KITU), including the organisation ORCA, have been actively campaigning for changes to the current legislative framework for regulation of higher education, which has been seen to result in unfair outcomes for academics by rewarding those who publish their research in disreputable or "predatory journals" (ORCA 2017b).

Lamentably, in addition to those already included, examples of corrupt practices are found in many parts of the world, including France (Mazodier et al 2012), Africa (Kigotho 2013), Nigeria (Orim et al. 2013), Egypt (Abd El Galail 2015), India (BBC news 2015), Kenya (Maina 2015), Russia (Rostovtsev 2015, 2016, Denisova-Schmidt et al. 2016, Osipian 2016), Mozambique and the USA (Mohamedbhai 2016), the Western Balkans (Foltýnek et al 2017), Japan (Forrest 2018) and the UK (BBC News 2018b). These examples include activities such as academics completing examinations for students, ignoring plagiarism and exam cheating, accepting bribes for preferential student treatment, compelling students to purchase materials from them as a condition for passing the course, tutors demanding sex for preferential grades and manipulating test scores for specific candidates. It is worth noting that none of the corrupt practices in the sources cited here were uncovered as part of quality assurance activities.

An unusual, officially sanctioned fraud in Japan was recently reported in *The Independent* involving accusations that Tokyo Medical University had changed

scores of female students to regulate how many of them passed the examinations, "over fears too many women drop out to have children" (Forrest 2018). The article claimed that this discriminatory practice was started in 2010 to ensure that no more than 30% of medical graduates were female (Forrest 2018).

The motivations behind grade changes by administrators at a Texas community college were not clear, but the report by *Inside Higher Ed* said that the 275 unauthorized grade changes for 124 nursing students, made weeks after the semester ended, went against the terms of the grant agreement with Texas Higher Education Coordinating Board (Smith 2018). Coastal Bend College, named in the report, disputes some unspecified aspects of the claims against them.

A disturbing story from Russia indicates that serious consequences can arise when people challenge the prevailing culture of corruption. Pinchuk & Coalson (2018) reported on a case of a concerned academic highlighting the availability of leaked exam questions on-line prior to the Unified State Examination (EGE), which is used for eligibility for university admission. However, instead of gratitude, the organization responsible for administering the examinations threatened the whistle-blower with legal action (Ibid).

A recent book, *Corruption and Governance in Africa*, provides a range of case studies about Swaziland, Nigeria and Kenya, "the three most corrupt countries in Anglophone Africa" (Hope 2017). In the chapter about Nigeria, Hope asserts that corruption is Nigeria's biggest challenge and that the country has developed a national and international reputation as a genuine menace through its corruption (Ibid).

With regard to examinations, the review by Amadi & Opuiyo (2018) explored the probable causes of examination malpractice as a form of corruption in Nigerian universities. Their findings suggested that, although the students do not like studying, they want to pass their exams at all cost. This makes room for some lecturers who "cherish sorting" (Amadi & Opuiyo 2018: 13) ['Sorting' is the local word for bribery in Nigerian education, more precisely defined as *"the practice of a lecturer having illicit or abnormal interactions … which will facilitate … a student scoring higher … marks … to place him or her in a better position"* (Osuji 2016)] and sometimes lecturers include material in examinations that goes beyond the syllabus. It has been claimed that the Nigerian authorities are not providing adequate responses to curtail these corrupt practices (Amadi & Opuiyo 2018: 13).

Occasionally, teachers are the target of corruption. On 11th July 2018, The Witness on-line news site opened a news story with the dramatic headline "Students attack lecturers" (Pillay 2018). This account describes students at the University of KwaZulu-Natal intimidating lecturers when they failed exams and assessments. The reported incidents include death threats, damage to property, fears for personal safety, to the extent that lecturers would only speak anonymously for fear of reprisals from students (Ibid.). Although it was reported that disciplinary action had commenced against some of the students, when asked to comment on the allegations, the University leader denied any knowledge of this issue (Ibid.).

Absenteeism of academic/faculty and "ghost advising" is another form of corruption in the teaching role that occurs in many part of the world, for different reasons. One form reported by Schultheiss (2018) is negligence of professors, who take responsibility and credit for supervising doctoral students or lecturing duties, only to delegate the work to junior colleagues. This situation is typically a consequence of one person holding multiple, sometimes conflicting, academic posts, perhaps by necessity in order to make a reasonable living wage, but sometimes for personal greed. This same phenomenon was also reported Lithuania, due to very low salaries and short-term appointments for academics (Glendinning 2013: 25). In Kosovo, the demand for multiple appointments arises because of the national shortage of professors, alongside the national institutional regulatory framework that stipulates the minimum number of professors required in order for an academic programme to operate (ORCA 2017b).

Exploitation and sexual harassment of students by lecturers is a particularly worrying form of corruption, which may be under-reported because of the power relationship and the victim's fear of retribution or of not being believed (for example in the UK: THE 2018b). In Australia, TEQSA responded to wider concerns about sexual assault and sexual harassment on campus and produced a guidance note for HE providers on Wellbeing and Safety, recently updated (TEQSA 2017c, version 1.2). The short document refers to support services that the HE provider should make available, how to manage "critical incidents" and the need to promote a "safe environment" for the whole community, not just students (Ibid, 2). The obligations of the HE provider are set out, together with details of what evidence TEQSA will require to ascertain whether the institution is taking their responsibility seriously (Ibid. 4).

In contrast, six complaints from students in Uganda about sexual harassment by lecturers led to a survey of students. The research conducted by Makerere University, across the *"university's 10 colleges and main administrative units"*, revealed a culture of covering up allegations of sexual malpractice, where victims can be blamed for provoking inappropriate behaviour, encompassing both staff and students as victims (Atuhaire 2018; McKie 2018a). A particularly deliberate type of predatory behaviour was reported, called quid pro quo sexual harassment in the report, whereby *"employment or progression is premised upon submission to sexual advances"* (McKie 2018a). The Vice-Chancellor is reported to have promised to address the concerns and eradicate the problem.

A UK news report in the *Daily Telegraph* based on research conducted the National Association of Schoolmasters and Union of Women Teachers (NASUWT 2018) reported that almost one third of 1290 UK-based female teachers who responded to the survey had been subjected to sexual harassment by students or colleagues (Turner 2018). Of those affected, one fifth said no action had been taken against the person who had harassed them.

It has been claimed that lack of codes of conduct is partly responsible for corruption problems in Russian HE providers (Fursova & Simons 2014). Over many years, many authors encouraged academics and teachers to take a responsible and ethical approach towards their duties

of teaching and assessing students (for example, McCabe 2015; Carroll 2005; Morris 2011; Bretag & Mahmud 2013, 2014). First serving the USA, and later internationally, the International Center for Academic Integrity (ICAI) has been highly influential in encouraging academic integrity in students, particularly through use of the surveys of faculty/academics and students by the late Donald McCabe (McCabe et al. 2001; McCabe 2015).

Organisations such as IIEP/UNESCO, CHEA and the Council of Europe have created many resources and publications to support institutions and their academic staff to be aware of corruption and to improve strategies and policies for ensuring integrity and maintaining standards including a code of conduct for teachers (IIEP/UNESCO 2015, Poisson 2009, ETINED nd, ETICO nd).

Measures open to AQABs to address any corruption in the teaching role include highlighting the problems identified in the institutional review report, requiring training and education for officials and adding conditions to the approval to ensure necessary improvements are made. An option for AQABs in extremely serious cases of corruption is withdrawing approval or accreditation until it can be demonstrated that the corrupt practices have been addressed. In such circumstances, consideration for the future status, funding and progression of students must be paramount.

A5.2.3 Student admission and recruitment

Recent examples aligned with the Advisory Statement are

- Publishing false recruitment advertising (Bradley 2013, 2018).
- Offering bribes to admissions staff or recruitment agents (Besser & Cronau 2015; Kakuchi 2018; Mohamedbhai 2016: 12-13; Slovak Spectator 2016; Watson 2017).
- Presenting falsified transcripts and/or fake recommendation letters (Stecklow et al 2016; Watson 2017).
- Participating in cheating rings for admissions tests (Fox News 2018; Redden & Jaschik 2015; Watson 2017).

Marketing materials from universities can be a source of corruption that misleads potential students into selecting an inappropriate institution, course or subject. Two

studies by the same author five years apart reveal that prospectuses from UK HE providers still contain a range of false claims, misleading statements and exaggerations (Bradley 2013, 2018).

An Australian *4 Corners* television program based on investigative journalism, screened in 2015, caused a huge response from across the Australian HE sector (Besser & Cronau 2015), because it exposed the negligence of named HE providers in accepting students using fake qualifications, including evidence of fraud in English language testing and complicit agents supporting the deception for monetary gain, that comprised systematized admission fraud (Besser & Cronau 2015).

A similarly themed BBC *Panorama* television program, broadcast in the UK in November 2017, revealed very similar practices in the UK, again with recruitment agents working with applicants to generate fake credentials and

to help the students fraudulently claim access to student loans, also naming specific private universities that were negligently admitting unqualified students (Watson 2017).

Both the Australian and UK television programmes also revealed evidence of the ongoing support provided for the applicants in the form of "contract cheating" in its broadest sense, which allegedly enabled the unqualified students to successfully graduate, by having an end-to-end personal support service throughout their studies (Besser & Cronau 2015; Watson 2017).

China has featured in several stories about corruption in university admissions (for example, Redden & Jaschik 2015; Stecklow et al. 2016; Fox News 2018). *Inside Higher Ed* reported on the use of impersonators in visa application interviews and again in English language testing and the production of fake passports to gain admission to US colleges (Redden & Jaschik 2015). A more recent story on the same theme in the USA came in the form of a news report on the successful prosecution of an impersonator from China and two of her customers, followed by their deportation (Fox News 2018).

A Shanghai-based recruitment company was the focus of a report about the use of fraudulent practices to help Chinese students gain admission to prestigious U.S. universities (Stecklow et al. 2016). The alleged corruption took the form of benefits and payments made to U.S. university admission officers by the company and manipulation of student transcripts to improve the student attainment profile (Ibid.).

Another well-documented class of admissions fraud, particularly affecting the USA, concerns the admission of athletes and sports stars to varsity teams where they do not hold conventional academic qualifications for college entry. A 2017 academic paper about reputational damage following scandals refers to several cases of admissions irregularities involving sporting motives, including one talented individual admitted to university with just a welding certificate and the exposure of an 18-year history of a "shadow curriculum" at another college, designed for the needs of academically challenged athletes (Downes 2017: 11-12).

The same article catalogues incidents of favouritism in admissions at several US institutions for high profile applicants and those with "political connections" (Downes 2017: 8-9). Such practices are reported to be not uncommon in some European countries, including Romania and Bulgaria (IPPHEAE 2013-15).

The *Slovak Spectator* in 2016 reported irregularities at the Pavol Jozef Šafárik University in Košice (UPJŠ) when five people in the medical faculty were charged with corruption in admissions, involving a bribe to the dean for preferential admission to a medical programme (*Slovak Spectator* 2016).

A recent scandal was exposed in Japan by University World News when a Director General from the Japanese Ministry of Education was arrested after allegations of a link between a government research subsidy and his son's admission as a student to Tokyo Medical School (Kakuchi 2018). This incident led to the resignation of two university officials who were accused of being complicit in this fraudulent transaction. The allegations also suggested that the university officials may have "doctored" the student's entrance examination result to pave the way for his preferential admission (Ibid.).

Mohamedbhai lamented the lack of progress in addressing corruption in higher education, citing examples from across the world, for example, an academic dean in Russia accepting a $30,000 bribe for admitting a candidate to a PhD programme and the "Vyapam scam" in India, involving systematic large-scale organised fraud by a government department, including the conduct of entrance examinations (Mohamedbhai 2016: 12-13). Bribery in admissions in Russia was reported by Fursova & Simons (2015), occurring as part of a much wider culture of corruption that permeates Russian society.

Corruption in admissions practices may not be transparent to AQABs in the course of routine institutional evaluation activities. In many of the literature examples above, this type of corruption surfaced through investigative journalism, whistle-blowers or anti-corruption activists. Any students fraudulently admitted or without appropriate qualifications are unlikely to progress without unfair means, such as cheating on their examinations and assessments. Therefore, institutions with unsafe or corrupt admissions practices are also likely to suffer from high rates of student cheating or inappropriate practices in teaching and assessment. AQABs are advised to work with ethically motivated parties, such as journalists and whistle-blowers, to pro-actively challenge any inappropriate admissions and recruitment practices and any side-effects resulting from these types of corruption, evident in the HEIs with which they are associated.

A5.2.4 Student Assessment

Recent examples that align with the definition of corruption in the Advisory Statement include:

- Sale of exam papers or exam-related material and use of essay mills (Awdry & Kralikova 2017; BBC News 2018a; Abd El Galail 2015; Crowthorne 2017; Lancaster & Clarke 2016; Clarke & Lancaster 2006; Orim & Awala-Ale 2017).
- Bribery of invigilators/proctors and markers (Abd El Galail 2015; Fursova & Simons 2014).
- Impersonation of candidates and ghost writing of assignments (BBC news 2015; BBC World News 2018).
- Plagiarism and cheating on continuous assessment, assignments and exams (Amadi & Opuiyo 2018).
- Inconsistencies and favouritism in grading (Downes 2017).

Additional examples of corruption in assessment:

- "Sex for marks" (Kigotho 2013).
- Promoting cheating to undergraduate students and school pupils (Besser & Cronau 2015; Fursova & Simons 2014; Kigotho 2013).
- Fake essay mill blackmail scams (Essay Scam.org 2018; Workplacetablet 2017).
- Academics and administrators completing examinations for students (BBC 2018b).
- Condoning or ignoring cheating in examinations and coursework (BBC News 2015; Qian Chen 2018).
- Collusion of the director, administration and teaching staff in examination cheating at a "pharma institute in India" (The Times of India 2018a).
- Examination leaks (Denisova-Schmidt et al. 2016; Pinchuk & Coalson 2018; Kurilla 2016).
- Students working as ghost-writers for other students (Bretag & Harper et al. 2018; Lancaster & Clarke 2016; Mills (pseudonym) 2017).

Examples of plagiarism and exam cheating by students fall on a spectrum of behaviour ranging from inadvertent academic poor practice through to deliberate fraud, use of ghost writers and impersonators. For this study, under the definition of corruption, we include the more serious and deliberate forms of student cheating.

Failure to identify, manage and address the threats of serious academic misconduct by students can lead to unfair outcomes and unreliable qualifications,

disadvantaging honest students and favouring students who resort to cheating. If we add to the examples of cheating reported incidents of academics taking bribes or asking for favours to change a grade or overlook plagiarism, or academics completing assessed work for students, then we can legitimately class such actions as corruption, implicating both students and their tutors.

A recent phenomenon, which has become known as contract cheating or essay mills, involves students receiving a range of services from a third party to help them to complete assessments, often for payment, as a step up from ghost-writing by friends and family (Lancaster & Clarke 2016; Clarke & Lancaster 2006; Bretag & Harper et al. 2018). The intentional nature of such conduct elevates this from misconduct to corruption. Contract cheating services can include impersonation in examinations, writing reflective journals and lab reports, even writing a whole dissertation or PhD thesis. Not only is such cheating very serious because of the deliberate deceit in procuring work (whether or not payment is involved), but it is also very difficult to detect and to prove that this transaction has taken place.

Contract cheating and ghost-writing were identified as occurring in some Nigerian universities. Orim & Awala-Ale (2017) explored students' perceptions and experience of these types of academic dishonesty in Nigerian higher education institutions. They concluded that the initial perception by the Nigerian students is that contract cheating and ghost-writing are unethical practices with significant ramifications. However, this view is distorted by two factors that convince participating Nigerian students these practices are worth pursuing: opportunity and loyalty to family, friends and colleagues (ibid).

Recent research in Australia has shown that it is often possible for experienced markers to detect ghost-written work (Dawson & Sutherland-Smith 2017), but it can still be quite difficult to gather sufficient evidence to justify imposing a sanction. In contract cheating, the corruption of the assessment process involves the student, a third party (the true author or creator) and often an intermediary, who can be the employee or owner of a very profitable commercial business.

There have been several investigations about the identity and motivations of people working for contract cheating companies and as informal ghost-writing providers, such as academics, colleagues of those students or graduates

from the same courses (Bretag & Harper et al. 2018; Lancaster & Clarke 2016; Mills (pseudonym) 2017, Healey 2018).

The Contract Cheating and Assessment Design project conducted by Bretag, Harper and colleagues in Australia found three main factors, "language, opportunity and dissatisfaction", that commonly lead to contract cheating (Bretag & Harper et al. 2018; CCAD infographic 2018). This project also revealed a serious disparity between the views of students and those of their teachers in response to a question about the seriousness of contract cheating (CCAD infographic), suggesting the need for more dialogue.

Some parts of the world have already introduced legislation against the companies that offer ghost-written custom essays and other inappropriate assistance to students. To date, 17 U.S. states and New Zealand have established legislative powers to prosecute contract cheating businesses. Australia and Ireland are in the process of designing legislation that targets the companies and those who advertise their services (McKie 2018b).

Clearly, left unchallenged, actions such as accepting or demanding bribes and favours for aiding and abetting cheating (in examinations, dissertations, research or other work) by academics, administrators, other students or external agents, are certainly undermining the standards and quality in higher education.

There are many examples from around the world of research degrees and doctoral degrees awarded as a result of ghost writing or high levels of plagiarism, implicating universities in Egypt (Abd El Galail 2015); Russia (Rostovtsev 2015, 2016) and Germany (Weber-Wulff 2014; VroniPlag Wiki nd) and many other countries.

Thesis defence committees and awarding bodies that fail to detect that the work in the thesis is not genuine are also implicated in supporting or tolerating of this form of corruption, in addition to the master's and doctoral supervisors and the students themselves. Some of the people later found to have undeserved master's degrees and doctorates had been appointed to high office in government, including the German Minister of Defence Karl-Theodor zu Guttenberg, who resigned in 2011, and the Education Minister of Education, Annette Schavan, who left her ministerial position in the Deutsche Bundestag in 2013 (Weber-Wulff 2016; BBC 2013). Both were forced to resign from their posts, although they denied any culpability (BBC 2013). A similar occurrence in Hungary in 2012 forced the resignation of the President Pál Schmitt, when his doctorate was rescinded after large-scale plagiarism was discovered in his thesis (Karasz 2012). In a well-documented case, the Prime Minister of Romania, Viktor Ponti, when found to have plagiarized (copy and paste of 85 pages verbatim) his PhD thesis, did not resign from his post (Schiermeier 2012). Although the University of Bucharest upheld the charge of plagiarism against Victor Ponti, the Romanian Government Board of Ethics found him not guilty on the grounds that his thesis met the academic standards that applied when the PhD was awarded in 2003 (Schiermeier 2012). Such cases do not set a good example for students to follow.

Fagbemi (2018) explored whistleblowing intentions with evidence from University students in Kwara State, Nigeria. He asserted that corruption has been an obstacle to Nigeria's development process and said that with no clear-cut protection policy for individuals who may want to raise an alarm on unethical practices, people could be afraid of the possible consequences (Ibid.).

Despite all the negative reports, proactivity by some AQABs is helping to highlight and address corruption. In response to the growing problem of contract cheating, in 2017, the UK's QAA assembled a national advisory group of experts, and Australia's TEQSA engaged an expert in this field to lead development of resources. This led to the creation of guidance notes for HE providers relating to development of policies for academic integrity (TEQSA 2017a) and responses to the growing problem of contract cheating (QAA 2017) and also to a Good Practice Note to address contract cheating (TEQSA 2017b). Guidance from both the UK and Australia was published in October 2017, immediately before the U.S.-led ICAI's second International Day of Action against Contract Cheating (ICAI 2018).

The fight against contract cheating companies has been bolstered by the UK's Advertising Standards Authority ruling in March 2018 to uphold two complaints raised by QAA against a contact cheating company trading as UK Essays, for misleading advertising (ASA 2018).

Recent research shows that cheating, favouritism, plagiarism and bullying are common across many countries and academic subjects (for example, as found by Bretag & Mahmud 2013, 2014; Bretag & Harper et al. 2018; Foltýnek et al. 2018; Glendinning 2013; Dawson & Sutherland-Smith 2017).

To gauge the extent of student cheating at any level is not at all easy. Statistics on the percentage of serious academic misconduct cases detected are generally low in the context of overall student populations, with self-reporting of contract cheating or "sharing behaviour" ranging over time between 4% to over 15% of those surveyed in empirical studies (Bretag et al. 2018, Awdry & Kralikova 2017). However, if using institutional statistics, the cases of serious forms of cheating not recorded, or simply not identified, cannot be quantified.

It is sometimes misunderstood that HEIs actively trying to discourage cheating will normally have a much higher number of confirmed cases than those HEI that are ignoring misconduct or denying that students cheat. HEIs can be reluctant to disclose their records on "academic misconduct" cases processed for fear of reputational damage by the press (*The Sunday Telegraph* 2012), so it is impossible to make fair comparisons about the prevalence of cheating from institutional statistics. Deliberate forms of student cheating can be condoned or seen as a game by both students and academics if the consequences of apprehension are trivial or absent (Foltýnek et al. 2018: 53-54).

On the positive side, Europe, the UK and Australia have benefited from a great deal of research to improve integrity in education and research, much of it funded by government bodies and international organisations (for example: Tennant & Duggan 2008; Tennant & Rowell 2010, Bretag et al 2014; Bretag et al 2017; Dawson & Sutherland Smith 2017; IPPHEAE – European Commission. Erasmus; SEEPPAI – Council of Europe, ETINED; ENERI – European Commission, GARRI; RESPECT – European Commission, CORDIS; ENAI – European Commission, Erasmus+). This research and evidence have improved awareness of the need for educational integrity globally.

Threats to quality, security and standards of student assessment through corruption evolve and diversify over time; therefore, measures to counter these threats cannot remain static. It is important that AQABs establish an open and transparent working relationship with HE providers, student organizations and other bodies with interest in fighting corruption and maintaining HE quality and standards to ensure that their responses and guidance to the sector remain relevant and effective. Dialogue with other interested parties is important through conferences, events, surveys or establishing working groups.

A5.2.5 Credentials and qualifications

Recent examples that align with the definition of corruption in the Advisory Statement include:

- Use of degree mills and accreditation mills (BBC Radio 4 2018; Kigotho 2013; Maina 2015).
- Falsification of transcripts and degree certificates (O'Malley 2018);
- Political pressures on HEIs to award degrees to public figures (Weber-Wulff 2016; VroniPlag Wiki nd; Rostovtsev 2015, 2016).

  Additional examples of corruption in credentials and qualifications include
- Doctoral degrees awarded for highly plagiarised or poor-quality theses (Weber-Wulff 2016; VroniPlag Wiki nd; Rostovtsev 2015, 2016).

Several organizations have published guidance notes highlighting types of corruption in credentials and qualifications. A comprehensive guidance document was published by the American Association of Collegiate Registrars and Admissions Officers in 2005 on *Bogus*

Institutions and Documents (AACRAO 2005). This booklet was written from a US perspective, but nevertheless is still highly relevant to the USA and all countries because much of the content concerns US student mobility internationally.

In 2005, OECD produced a report jointly with UNESCO that was looking into how to encourage more cross-border education and to provide recommendations to OECD and UNESCO member states on managing the associated risks to students when applying to HE providers. The report indicated that more information was needed to help students avoid the risks of misleading guidance put out by bogus and low-quality HE providers (UNESCO & OECD 2005).

A follow-up initiative by UNESCO in conjunction with CHEA in 2008 brought together an international group of experts specifically tasked with investigating the growing problem of degree/diploma mills and disreputable colleges. The group's report (CHEA & UNESCO 2011) included a range of recommendations

for different stakeholders about how to discourage degree/diploma mills and fake credentials, organized under six topics:

- Identifying suspect organizations
- Vigilance by AQABs undertaking institutional approval and accreditation
- Distribution of public funding for HE students and providers
- Awareness raising, public information
- Possible legal routes and challenges
- Operational disruption.

Despite these and other excellent publications on this topic (for example: World Bank Group 2015, UNESCO 2014), the corrupt practices they were trying to stem have persisted and appear to be expanding and evolving (BBC Radio 4 2018).

Black lists of fake and unaccredited HE institutions are maintained by various organisations, national governments and institutions (CHESICC nd; HEDD nd; My eQuals; NACES nd). Many organisations maintain (white) lists of accredited institutions and qualifications or provide guidance on detecting a diploma mill (for example ENIC-NARIC nd). Particularly notable is the World Higher Education Database (WHED) that currently covers 186 countries and is available on line without charge. WHED is managed by the International Association of Universities (IAU), which has developed guidance and information about both institutions and credentials.

A recent report from Daniel (2018) summarizes a novel technological approach towards solving the problem of fake credentials, led by the Groningen Declaration Network (GDN). This organisation was founded in 2012 to bring together organizations from across the world that are providing authentication services for credentials and institutions (Groningen Declaration: Netherlands; Higher Education Degree Datacheck (HEDD): UK; My eQuals: Australia and New Zealand; CHESICC: China).

To focus the minds of the AQABs in different countries, it would be useful to have a measure of how many diploma mills there are and where they are based geographically. A survey conducted in 2010-11 found evidence of 1095 degree and accreditation mills operating from North America, with the USA the leading country for hosting, with 1008 companies identified, but showing a rising trend of 48 percent compared to the same survey a year earlier (Cohen and Winch 2011: 26-27). California, with 198 companies, was the US state with the highest number

of companies (Ibid.). The same report noted that the UK hosted 339 of the 603 diploma and accreditation mills based in Europe (Ibid, 28). Many diploma mills have names that may sound plausible to some people (for example: "International University of America"), or that are very similar to names of respectable universities. These authors found that the same IP (Internet Protocol) address is used for many diploma mills with different institutional names, confirming a range of "products" is offered by the same parent company (Ibid, 14).

At the time of writing this report, the UK service HEDD had a list of 471 recognised UK institutions and 243 unaccredited institutions (including historic data dating back to 1990 (HEDD nd). There was a boost to public awareness of such services when a brief article appeared at the top of the front page of *The Times*, with HEDD's Jayne Rowley advising newly graduating students not to post photographs of their graduation certificates on social media: *"The forgers will all be desperate to get their hands on the 2018 certificates"* (*The Times* 2018).

The Federation of French-speaking students in Belgium (FEF) recently reported on more than 82 "fake universities" based in Belgium and called for action to make them illegal (EUS 2018).

It is a very time-consuming process to keep lists current, and those maintaining white or black lists are open to the risk of expensive lawsuits brought by highly profitable but unethical companies. Many press, media, investigative journalism reports, blogs, radio broadcasts and videos already included in this report are readily available to demonstrate how corruption in credentials and qualifications affects every country.

Corruption in HE may also take the form of academic fraud in accreditation. In their analysis of disreputable institutions, Cohen & Winch discuss the phenomenon of accreditation mills, explaining that *"Diploma mills often surround themselves with other dubious organisations in an attempt to gain credibility … An accreditation mill is a bogus accrediting agency that is not recognised"* by the appropriate education authority (2011: 6). They also explain that diploma mills often "fabricate" an accrediting body to provide evidence of their legitimacy to operate (Ibid.).

The European Quality Assurance Register web site provides guidance on how to recognise fraudulent accreditation agencies, together with access to a list of unaccredited organizations (EQAR, nd). Such deliberate

fraudulent practices, whose sole intent is to make money without any heed to possible harm to the public, should be distinguished from the phenomenon of poor quality degrees from inadequately resourced HE institutions.

An article in *University World News* in January 2018 detailed the anti-corruption work of a group of people in Nigeria, starting with the 2001 appointment of Peter Okebukola as executive secretary of the National Universities Commission (O'Malley 2018). His first action in this new role led to the closure of approximately 60 "satellite campuses that were selling [fake] certificates", which took place in a single day. Prof. Okebukola is president of the Global University Network for Innovation, GUNi-Africa. In this role he continues to provide leadership in the fight against academic corruption across Africa and beyond (Ibid.).

Reports of fake and worthless degrees, not always from disreputable colleges, continue to surface from almost every part of the world. For example, there was some success after calls for revocation of PhDs awarded to medics in Germany, which were clearly not supported by theses of PhD standard. Some were heavily plagiarised or contained fabricated data (Weber-Wulff 2016; VroniPlag Wiki nd). 2 Many examples of the use of the Pakistan-based diploma mill Axact in Canada, the USA (CBC 2017; Szeto & Vallani 2017) and the UK (BBC File on 4 2018). 3 Unjustified awarding of PhDs by public universities in Russia (Rostovtsev 2015, 2016). 4 Revocation of the PhD of a lecturer from Kosovo by Bremen University after the thesis was found to be plagiarised (Prishtina Insight 2018). 5 Fake degrees and diplomas for money issued by universities in Kenya (Maina 2015).

The very worrying factor with many of the examples above is when people with fake degrees find their way into influential, responsible and senior positions in fields including medicine and healthcare, engineering and education, for which they do not have the necessary background, experience, skills or knowledge. Of particularly concern is the potential erosion of professional values and expertise, which is potentially life-threatening in disciplines such as healthcare, medicine, engineering and science (for example, BBC News 2015; Besser & Cronau 2015). This factor should be of great relevance and concern to AQABs relating to these professions.

To counter the threats described in the literature, include the creation of national and international secure digital repositories of qualifications and credentials, as exemplified by the services provided by GDN member companies. All AQABs can help by supporting and promoting the availability of such resources and encourage widespread use within the education sector in recruiting staff and students and in graduate staff recruitment more generally. Knowledge about and increased use of white lists and black lists can help to detect fraud and, in time, should help reduce the demand for and supply of fake and unearned credentials.

A5.2.6 Research and publication

Recent examples that align with the definition of corruption in the *Advisory Statement* include:

- Fabrication of data or results (Abbott 2016; Abd El Galail 2015; BBC News 2015; MacAskil et al. 2015; Oransky 17th May 2018).
- Suppression of inconvenient research results by commercial and other interests (BBC News 2015; McCook 2018a).

Additional forms of corruption in research and academic publishing:

- Peer review fraud (Barbash 2014; Packer 2018).
- Predatory or disreputable journals and conferences (Beall's List nd; Packer 2018).

- Violations of ethical conduct in research (Abbott 2016; Cyranoski) 2018.

Three types of corruption listed under this category in the advisory statement did not feature in recent literature but were raised as common problems by several interviewees:

- Presentation of theses translated from other languages as original work.
- Publication by supervisors of research by graduate students without acknowledgement.
- Suppression of rival work by journal reviewers.

As with other forms of academic conduct, corruption in research can be viewed as a spectrum, ranging from questionable research practices, such as

underrepresentation of negative results in publications or minor plagiarism, through to fraud in the sense of fabrication of results or deliberate misrepresentation of evidence, and an unwillingness to withdraw research that has been discredited. This study is focusing on the more serious and intentional forms of corruption and measures by regulatory bodies to reduce such conduct.

National governments of the UK, China and Sweden have each recently taken action to strengthen research ethics and address misconduct and corruption in research and academic publication. As the following summaries demonstrate, different approaches have been adopted in different parts of the world.

In June 2018, the Swedish Government proposed the establishment of a "new national agency, the Research Misconduct Board" (Government of Sweden 2018). The new board is designed to ensure consistency of approach and legal accountability, but the subtext could be to help restore the reputation of Swedish research following a case of "scientific and clinical misconduct" at the Karolinska Institute in Stockholm involving thoracic surgeon Paolo Macchiarni (Abbott 2016).

The government in China has indicated very recently that it intends to introduce a central committee, under the management of the Ministry of Science and Technology (MOST), for investigating cases of scientific misconduct (Cyranoski 2018). It also intends to create a national database to keep track of and to publicize the misconduct accusations and outcomes (Ibid.).

In October 2018, an outcry about political interference from across the Australian HE sector followed the decision by then-education minister Simon Birmingham to veto research funding recommended by the research council for eleven arts and humanities projects (Universities Australia 2018).

Following a comprehensive review of research conduct in the UK, Universities UK (UUK) established the concordat, which is a "comprehensive national framework for good research conduct and its governance" (Universities UK 2012: 4). The essence of the framework is that, rather than creating another regulatory body, the onus was placed on the signatory institutions and their research communities to self-regulate through transparent and accountable institutional processes. The concordat built on important international influences, including the Singapore Statement (WCRI 2010) and the European Code of Conduct for Research Integrity from 2011, which has

been recently revised (ALLEA 2017).

The most recent UK government report on this subject provides a useful commentary on approaches to research integrity in Japan, Australia, Canada and Denmark (House of Commons 2018: 47-49), where there are different roles, relationships and requirements of national bodies in relation to internal institutional regulatory functions. This summary leads to a recommendation that the UK Government ask the newly established UK Research and Innovation funding council (UKRI) to "establish a new national committee" adopting practices similar to those in Australia and Canada in evaluating and verifying whether appropriate processes have been followed when investigating allegations of research misconduct (House of Commons 2018: 49-50).

In the USA the Office of Research Integrity, located within the Department of Health and Human Services (HHS), has responsibility for part of the research in public health across the USA – research in other fields of public health, including food and drug administration, is managed separately. Based on web site information (ORI nd), the remit of the ORI includes strategy, policy and resource development for encouraging responsible research practices, dissemination of good practice on research integrity through the provision of "activities and programmes", supporting research institutions in their handling of allegations of research misconduct; and oversight of research misconduct investigations conducted by institutions involved in research. The ORI also provide openly accessible "case summaries" of research misconduct, but the ORI Annual Report System, with restricted access, lacks transparency (ORI nd). The web site FAQ sets out a range of "administrative actions" that the HHS can impose for proven cases of research misconduct (ORI nd).

Peer reviewed scientific publications and academic conferences are the principal methods for disseminating progress and results from academic research, and therefore are central to the academic community. Research and development in any discipline builds on earlier findings (positive and negative), successes or failures and achievements. Misleading, inaccurate or false reporting of research can have serious impacts on future research. Sometimes, genuine mistakes, such as misinterpretation or errors in calculations, can be discovered after publication, in which case the authors can request a retraction of the paper. However, this study is focused on corruption that stems from deliberate rather than unintentional actions and decisions of researchers.

Recent examples of retractions have been reported resulting from questionable research practices (QRP), skewing of research to suit the funding body (McCook 2018a), inability to replicate results (Retraction Watch July 2018) and fabrication, falsification and plagiarism (FFP) in research (Abd El Galail 2015; MacAskil et al. 2015).

Organizations such as Retraction Watch, PubPeer and the Committee on Publication Ethics (COPE) play vital global roles in highlighting problems (for example, Oransky 2018), providing information (Retraction Watch database) and leadership in setting standards (COPE guidelines).

The subject of much discussion is how to ensure that retracted publications are suitably flagged to avoid future researchers assuming the findings are authoritative. Ideally, any publications that depend on or cite any discredited research or publications should also be revised or flagged. Unfortunately, not all publishers are meticulous in highlighting retracted papers and can be very slow to react even in the most extreme cases of scientific fraud. A particular example of this concerns discredited Japanese researcher Yoshitaka Fujii and the delay of more than five years by both Elsevier (20 papers) and Springer (1 paper) to retract the papers that were found to be based on fabrication of data (Oransky 17th May 2018).

Another example relating to lack of reliability of published research relates to the recent introduction of pre-print publications, whereby research is published by open-access prior to peer review. The advantage of this publication method is that it helps to speed up the dissemination of findings from interesting research. However, there are problems when other authors cite the work as though it were peer reviewed (Packer 2018), which can then lead to unverified results being relied upon by other researchers.

A metadata analysis conducted in 2010 exploring published research concluded that the "publish or perish" culture permeating academia was increasing researcher productivity but leading to bias towards positive results, especially when the corresponding author was based in the USA (Fanelli 2010).

The peer review process itself has been the subject of scams and corruption, most notably the "peer review ring involving" academics in Taiwan, leading to 60 retractions (Retraction Watch 2014). Journal editors have a responsibility to ensure their peer reviewers have no conflicts of interest.

Very little evidence was found in the literature about the role of AQABs in the regulation or monitoring of fraud in scientific research and publication, either actively or passively. One example located concerned the actions taken by the US National Institutes of Health (NIH) in response to financial irregularities and inappropriate management of several research projects at Duke University, including conduct of cancer research (Kaiser 2015). The NIH imposed specific restrictions and requirements on the University's research applications and budgeting in an attempt to prevent further malpractice in research (McCook 2018a).

Whether or not AQABs are directly involved in scrutiny of academic research and the academic publication process, a healthy culture of high quality research is fundamental to most higher education institutions. Any suggestion of corruption in this area raises questions about other elements of the HEI's operations, some of which will certainly overlap with the AQAB's remit – not least because learning about research practices and academic writing are integral to the educational process. It is incumbent on the AQAB to explore any perceived problems and to establish what has been done by the institution to address any apparent shortcomings and what impact this may have had on other aspects of the HE provider's operations.

A5.3 Summary of literature review

Many of the examples of corruption in the literature defy categorization under the six topics we are using, for example a national survey of Nigeria in 2012 revealed a range of types of corruption:

> "cheating during exams; marks given for favours, especially financial and sexual; hacking of institutional IT systems to alter students' academic records; plagiarism of assignments, term papers and theses; absenteeism of students and lecturers from classes; failure to cover the syllabus before the end of the semester and the conduct of the examination; outsourcing of theses, assignments and projects; publishing in fake journals; and sabotage involving preventing others from completing their work, for example by cutting pages out of library books or wilfully disrupting the experiments of others" (O'Malley 2018).

A consequence of the findings of the Nigerian survey was the establishment of the Anti-Corruption Academy of Nigeria, which kick-started the move to introduce clear and transparent institutional policies in the country, driven by the provision of "capacity-building workshops for staff and students on avoiding academic corruption" (O'Malley 2018). A further national survey held in December 2017 "showed a 20% reduction in cases of examination malpractice" (Ibid.).

A study mentioned earlier from 2017, which cuts across the six categories of corruption, focused on reputations of university providers, both in terms of proactively building a reputation as a quality provider and how to recover reactively after reputational damage following a high-profile scandal (Downes 2017). The research includes many examples of corruption in the US, including child abuse at Penn State University lasting two decades, implicating instructors and students; sexual harassment at Princeton and at Northwestern University; drug abuse at Colombia and Texas Christian universities; nepotism at University of California Santa Cruz (Ibid, 5-10). The study explores how each incident impacted the individuals involved and the reputation of the institutions, including reductions in donations from benefactors and downturn in student recruitment.

Unwarranted government interference in higher education institutions, which featured several times in the literature, is a serious threat to institutional autonomy, with examples from Brazil (Pells 2018b), Hungary (Pells 2018a), Turkey (THE 2017, 2018b) and the USA (Borchers 2018).

As has been demonstrated, there is no shortage in the literature of evidence about corruption in higher education, affecting almost every part of the world. There is clear evidence of complacency in many parts of the world where corruption is endemic to society as a whole (Fursova & Simons 2014, McKie 2018a). Many of the effective responses to corruption in higher education come from international watchdogs, NGOs, bloggers, volunteer activists and dissidents (Dissernet, COPE, Retraction Watch, UNESCO, ORCA, VroniPlag Wiki and many more).

As this study for CIQG is primarily focused on the role of AQABs in addressing corruption in academia, it is a welcome development that some pro-active good practice from AQABs has been reported from the literature, notably from Anglophone countries. However, this insightful approach appears to be the exception rather than the rule. These examples serve as guidance for other AQABs in how they can strengthen their role in combatting academic corruption.

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