# ACADEMIC INTEGRITY

**Supporting Cultures of Academic Integrity: The role of quality assurance agencies in promoting and enhancing academic integrity and ensuring learning**

ENQA WORKING GROUP ON ACADEMIC INTEGRITY

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Quality Assurance in Higher Education

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# Foreword

Academic integrity is one of the fundamental values of higher education within the European Higher Education Area. Even before artificial intelligence became ubiquitous in academic life, the higher education sector was looking at ways to better fight against plagiarism and cheating services, while sensitising staff and students to the many dimensions of appropriate conduct in their work. It is therefore a topic that has pre-occupied me and the ENQA Board for some time, and we were delighted that the proposal to launch a working group on this theme was met with enthusiasm among ENQA members.

In parallel, efforts to address academic integrity have intensified in many fora. In 2020-2024, a working group of Bologna Process Follow-Up Group formulated definitions of the fundamental values and piloted a monitoring framework. In 2023, quality assurance agencies in Ireland and Australia led the foundation of a Global Academic Integrity Network, endorsed by ENQA and with the involvement of many of our members. Many more initiatives and organisations are mentioned in this report. Throughout their work, there have been debates about the role of quality assurance, and specifically of agencies, in monitoring and promoting academic integrity. This continues into the discussion about the scope and content of the forthcoming new version of the ESG.

Academic integrity is a shared responsibility for the whole sector. It encompasses individual behaviour and responsibilities, policies and practices at higher education institutions, and legal frameworks at system level. Quality assurance agencies may have different roles depending on their status and remit. Many include references to academic integrity in their criteria or standards, some work on communication and awareness-raising, and a few have legal powers to propose legislation or fight against cheating services.

I very much welcome the recommendation from the working group for the higher education community to further address academic integrity through coordinated actions to conduct research, share information, provide training, and ensure sufficient legal provisions and protections. Clearly this has to be a joint effort as no single organisation is likely to have the remit, resources or expertise to tackle it alone.

I hope that the report is useful for the ENQA community and that it provides inspiration for further discussion and action among agencies and at ENQA, within their remits and in cooperation with the whole higher education sector, to uphold and promote academic integrity.

On behalf of ENQA, I would like to thank all agencies and individual staff members who participated in this working group. Particular thanks go to QAA (UK) who proposed the idea of the working group and to Gareth Crossman who initially chaired it, as well as to Sue Hackett (QQI, Ireland) and Yvonne Overdevest (NVAO, the Netherlands) who subsequently took over the chairing and led the preparation of the final report.

Final thanks go to all ENQA member and affiliate agencies who contributed to the work by responding to surveys, taking part in interviews, and participating in discussions at various events.

I look forward to exploring further how ENQA can continue its engagement on this topic.

Douglas Blackstock
ENQA President

# Executive summary

As stated in its mission statement, ENQA is '*the designated stakeholder organisation of quality assurance agencies in the EHEA*' and as such, '*the community of agencies drive innovation in quality assurance and refines quality assurance processes'*. One of the three main goals is '*Driving the development of external quality assurance'* and it was with this over-arching goal in mind, that, in 2020, an Academic Integrity Working Group was established.

The Working Group invited all ENQA members to submit data and case examples, and the contributions have been collated and analysed. The ensuing report is presented here as a resource for the ENQA community and any other interested parties.

In recent years, all stakeholders involved in higher education have become increasingly aware of academic integrity as an area which is fast-moving and multi-faceted, bringing with it both opportunities and threats. Academic integrity has become a subject of debate, discussion, challenge and concern.

Key factors that have had a role in bringing attention to academic integrity as a critical issue, are:

- the mobility of learners;
- the massification of higher education leading to a significant increase in student enrolment in higher education institutions;
- transnational education;
- the increasingly diverse student profile, e.g., working whilst learning, online as well as on campus;
- the increasingly competitive international and national employment environment;
- the unfettered growth of the online global environment;
- the reach and impact of social media;
- the advancement and rapid diversification of artificial intelligence including the development of new technological educational models.

Opportunities to foster multi-culturalism, diversity and appreciation of difference can only be welcomed, as encapsulated in some of the above factors. Equally, improved access to information, better communication, increased higher education opportunities cannot be argued against – these are all positive factors in themselves.

However, all of the above also come with embedded challenges and potential threats to the academic integrity of students, institutions, educators, and qualification systems. Where students cross borders to enrol in higher education institutions (HEIs), there is a need for cross-cultural supports and awareness-raising, including crucially, for language competence, to enable integration and success in their studies (see Dawson, P., 2021). Where any provision is online, there is a need for security, to protect the learner and staff member from the reach of online 'bad actors' which are focused on providing services which enable cheating at a price. Where students are 'invited' through social media, apps and websites to register for 'study help' with online companies, there is a need to educate students and staff, to protect them and build awareness, and therefore resilience to this type of activity. Where there is pressure to achieve in an environment that may appear uncaring or unfriendly, there is a need for provision of accessible student support. Additionally, programmes and their assessments need to be designed and scheduled in a way which enables learning to take place, creates an environment for optimal performance, enables student success, and mitigates conditions in which students may be tempted to cheat.

This report brings together the outcomes of the research carried out by the ENQA Academic Integrity Working Group and summarises both what has been revealed, and recommends what could be acted on

going forward. Specifically, it outlines the educational environment across Europe (and beyond), how the multi-dimensional culture of academic integrity is able (or not) to thrive in this landscape, and what can be done by quality assurance agencies to further enhance this.

While there was a significant range in the data received in relation to academic integrity and current activities in this area, there were four clear over-arching themes which emerged and it is these that the report attempts to describe and explore:

- Theme 1: the academic integrity landscape: what does it look like?
- Theme 2: the need for focused research: how can we generate more evidence and data on what is happening?
- Theme 3: professional development: what do educators and students need to know? What kind of education/training can be provided to enlighten and empower the key stakeholder groups?
- Theme 4: the commercial 'cheating' industry': What risks does this pose? How can it be effectively combatted?

And, bearing in mind that academic integrity is everyone's responsibility, what do the four themes mean for quality assurance and quality assurance agencies in terms of our collective and individual responses?

The Working Group research mapped the current activities by quality assurances agencies to address academic integrity. This revealed that some agencies have policies in place requiring higher education providers to have their own policies and procedures. Many of these focus on the need for study skills development, e.g., referencing sources, and others are focused on researchers. In two cases, there was evidence of significant and well-resourced activity to support and foster academic integrity, and reduce the risks to the sector. Of the rest, there was a range of general reference but very little that addressed the challenges of the current environment. In all cases, the benefits to be gained from a collective understanding and core approach to what is a global issue were evident.

The main conclusion is that there is a need for action, to foster cultures of academic integrity across higher education systems, to provide opportunities for enhancement and awareness-raising, and to protect qualification systems. The assault of online predatory 'cheating' companies on higher education systems, targeting students, is real, and enables circumnavigation of learning. It then exposes:

- students to the lure of unethical behaviour, creating gaps in their learning (and even the risk of blackmail by these companies for those who avail of their services);
- HEIs to the undermining of their qualifications;
- employers to potential employees who have not achieved the full qualification through their own learning;
- society at large to an education system which does not deliver to the standards required.

And so, leading from this, the main recommendation is the development of a collective core approach to address the current environment in relation to academic integrity. The report may also provide food for thought for the authors of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) regarding the links between academic integrity and quality assurance, and stimulate some thinking on how this issue could be further addressed appropriately in the upcoming revision of the ESG. The report also contains related recommendations highlighting the need for professional development opportunities and training for all stakeholders within the academic community, especially staff and students; the key benefits to be gained from a review of assessment approaches; the allocation of resources to enable protection for students, particularly for the student groups shown to be the most

vulnerable, e.g., mature students, non-first language students, and to enable the protection of our qualification systems to ensure they can be trusted and valued.

Finally, all of us in the Working Group hope that you find the following detailed report useful in supporting further developments both in your jurisdiction and across the EHEA.

If you would like to learn more about the work carried out, please contact ENQA at secretariat@enqa.eu.

Sue Hackett and Yvonne Overdevest
On behalf of the ENQA Working Group on Academic Integrity

List of ENQA agency members with participants, at the time of writing the report:

| 1. | Quality and Qualifications Ireland | QQI | Ireland | Sue Hackett (Chair) |
|---|---|---|---|---|
| 2. | Quality Assurance Agency for Higher Education | QAA | United Kingdom | Eve Alcock |
| 3. | Agency for Quality Assurance in Higher Education | ARACIS | Romania | Madalin Buniou |
| 4. | National Evaluation and Accreditation Agency | NEAA | Bulgaria | Ivan Kurtev |
| 5. | Estonian Quality Agency for Education | HAKA | Estonia | Karin Laansoo |
| 6. | Accreditation Organisation of the Netherlands and Flanders | NVAO | The Netherlands | Yvonne Overdevest |
| 7. | Slovenian Quality Assurance Agency for Higher Education | NAKVIS | Slovenia | Klemen Šubic |
| 8. | Royal College of Veterinary Surgeons | RCVS | United Kingdom | Kirsty Williams |
| 9. | Slovak Accreditation Agency for Higher Education | SAAHE | Slovakia | Andrea Zacharová |

N.B.: Please note that the composition of the Working Group changed during the course of its work. The list above includes the members in place at the time of writing the report. Thanks are due to all who participated and contributed to the group at various times.

# PART 1: Introduction

This report aims to raise awareness of the fundamental importance of academic integrity across the many areas and functions of higher education. As this topic has gained traction and attention in recent years, it has become apparent that it is an issue that quality assurance agencies cannot afford to ignore, and so the participants of the working group, all with key roles in their respective quality assurance agencies, undertook this research to:

- reveal and explore current practices;
- identify and reflect on commonalities and differences;
- consider what actions to take protect students, staff and society at large and build capacity within the sector.

It is structured to provide some background and the context in which the initiative took place, present the outcomes to the research, stimulate thinking and provide suggestions for reflection and possible actions going forward.

## SETTING THE CONTEXT

What is academic integrity and what is its relationship to quality? Why is it such an important issue for higher education quality assurance agencies?

Why should this be an area for which investment and resources may be needed, at a time when, more than ever, finances are already allocated and stretched thinly?

Academic integrity in the past has traditionally been seen by higher education institutions (HEIs), either primarily or exclusively, as a question of ensuring that students avoid plagiarism, and are equipped to use correct referencing and acknowledgement of sources in all their academic work. In tandem with this, quality assurance agencies have required HEIs to have policies in place regarding academic misconduct, sometimes asking for information on how plagiarism and associated study skills are addressed in study skills training as well as the formal procedures for investigating any proven cases, along with the sanctions that pertain to it.

In terms of the existing European framework for quality assurance, the current Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) make reference to academic integrity; for example:

In Part 1 for internal quality assurance:

ESG 1.1. Policy for Quality Assurance explicitly states in its guidelines that a quality assurance policy should support, amongst other things, "*academic integrity and freedom*" and be "*vigilant against academic fraud*" (ESG, 2015, p 11).

Other aspects of academic integrity are implicit in other standards and their guidelines. For example, in ESG 1.5 Teaching Staff, the guidelines specify that the environment "*offers opportunities for and promotes the professional development of teaching staff*" […] "*essential in creating a high quality student experience*". It is also possible to consider it as part of the guidelines of ESG 1.7 Information Management, where data on "*student progression, success and drop-out rates*", as well as "*learning resources and student support available*" are proposed as areas of interest. And in ESG 1.9 Ongoing Monitoring and Periodic Review of Programmes, the guidelines state that quality assurance should cover "*the effectiveness of procedures for assessment of students*".

All of the above are also implicitly reflected in the ESG Parts 2 (external quality assurance) and 3 (standards for quality assurance agencies).

With these references forming a background to the remit of the Working Group, a core part of the work was to capture what is happening in practice across the European quality assurance landscape regarding academic integrity and quality assurance, both in HEIs and quality assurance agencies, and report on the variety and range of current policies and practices (see Part 2 of this report).

Higher education has faced and continues to face new and ever-emerging challenges, with the sophisticated and ubiquitous global online world, the increasingly influential role and reach of social media and more recently, the emergence of widely accessible artificial intelligence. All of this places unprecedented pressures and reliance on the ethical behaviour of students and staff. Complying with "*the ethical and professional principles standards, practices and consistent system of values, that serves as guidance for making decisions and taking actions in education, research and scholarship*" (European Network for Academic Integrity (ENAI) Glossary – Academic Integrity, 2024) has become increasingly essential for maintaining and sustaining a quality education environment.

To add a more detailed definition of academic integrity to that quoted above from the ENAI Glossary, the Australian Office for Learning and Teaching "*developed a Plain English definition based on themes which emerged from interviews with 28 senior managers in Australian higher education*":

> "*Academic integrity means acting with the values of honesty, trust, fairness, respect and responsibility in learning, teaching and research. It is important for students, teachers, researchers and professional staff to act in an honest way, be responsible for their actions, and show fairness in every part of their work. All students and staff should be an example to others of how to act with integrity in their study and work. Academic integrity is important for an individual's and a school's reputation*". (Bretag et al., 2013)

This definition very much reflects the Fundamental Values of Academic Integrity (3rd edition) as drawn up by the International Center for Academic Integrity (ICAI):

> "*The International Center for Academic Integrity defines academic integrity as a commitment, even in the face of adversity, to six fundamental values: honesty, trust, fairness, respect, responsibility, and courage. From these values flow principles of behavior that enable academic communities to translate ideals into action. The Fundamental Values of Academic Integrity describes these core values in detail and provides examples of how to put them into practice on campuses, in classrooms, and in daily life*". (ICAI website, accessed July 2nd, 2024)

All three definitions are very useful in considering academic integrity and how it should be an integral part of an educational culture.

As indicated above, the academic integrity field has seen seismic shifts in the last 20 years, to the point of perhaps seeming overwhelming. Generally, advice for HEIs is to begin with policy, and, as Cath Ellis,[1], Tricia Bertram-Gallant[2] and other international experts in this field often say when referring to academic integrity, all stakeholders internal and external have a responsibility for ensuring academic integrity can thrive, and for fostering a robust academic integrity culture. Regular advice is to '**make it someone's**

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[1] Professor Cath Ellis is formerly of University of New South Wales and University of Sydney (both Australia), and now freelance, www.cathellis.com.
[2] Dr Tricia Bertram-Gallant is Director of the Academic Integrity Office at the University of California, San Diego (USA) and an ICAI Board Emeritus.

**job'** in an HEI, i.e. appoint someone who can lead on this, not just as an addition to an existing job description. Indisputably, the core principle here is that academic integrity is an essential part of all academic enterprise and activity.

To further emphasise this point, the late Tracey Bretag, in an interview in 2019, made the following points:

> '*I maintain that it is absolutely critical that **every member of the academic community takes responsibility for academic integrity within their specific spheres**. For too long, we have placed all the responsibility for upholding academic integrity on the shoulders of students, often expecting a higher standard from them, than we do of faculty or the institution. It's time to recognize that students take their cues from their mentors and academic leaders. We all need to recognize that **academic integrity is a positive and ethical approach to learning**, and one that requires a shared understanding across all stakeholders, developed through induction, ongoing training, mentoring, collegial conversations and institutional commitment. Let's stop talking only about the opposite of academic integrity (misconduct, fabrication, cheating, plagiarism, etc.) and focus on the much more important process of **developing cultures of integrity**.*' (Bretag and Peters, 2019)

As part of a national Australian research project, the academic integrity policies of 40 Australian HEIs were analysed and from this data, the Five Core Elements of Exemplary Academic Integrity Policy were developed (see Bretag et al, 2011 and Bretag and Mahmud, 2016). This is also explained further from a very practical viewpoint in the Good Practice Note: Addressing contract cheating to safeguard academic integrity (TEQSA, October 2017).



**Figure 1** - Five Core Elements of Exemplary Academic Integrity Policy, Bretag et al, 2011

The educational benefits and challenges posed by the global online world have become increasingly complex, multi-faceted and fraught with opportunities and threats that have fundamental implications for our education systems at all levels and, in particular, for third level study. The field of academic integrity is one which has been redefined by the online opportunities both for access to information and research, and, in its most worrying aspect, to a pernicious and predatory 'cheating services' industry. This industry offers services first named by Thomas Lancaster and Robert Clarke (Lancaster and Clarke, 2006), as "contract cheating", i.e. provision of work, assignments etc, often but not always for a set fee.

The ENAI Glossary defines this as a

> "*form of academic misconduct when a person uses an undeclared and/or unauthorized third party to assist them to produce work for academic credit or progression, whether or not payment or other favour is involved*".

This may take the form of a contract whereby assignments are completed by a ghost writer and sent back to the payee, for submission as their own work. The service may also be through a 'file-sharing site' (sometimes also called a peer-to peer site) hosted by a company, which invites students and others to upload completed and assessed work for a fee. These assignments, categorised according to HEI and programme, are then offered for downloading, again at a fee, to any registered users.

Although it is undeniable that cheating is not a new phenomenon, it is only in this century that *'the ways in which student cheat have changed dramatically'* (Peters, 2018). It is only with the advent of the 'study/homework services' online industry, that cheating and all its associated malpractice has metamorphosed into a field which straddles all aspects of the student academic experience. Tackling this requires a strategic approach, up-to-date dynamic policies and implementation plans to ensure a high level of stakeholder awareness, provide learners with a genuine resilient learning experience, and protect the integrity of national qualifications systems. The need for a robust approach is critical in order to sustain and maintain confidence in the education system's trustworthiness, validity and verifiability.

In the current environment, this is important as it will provide and enable:

- the safeguarding of learning and the integrity of the achievement of that learning, irrespective of context;
- the assurance that graduates have the competences as verified by their qualifications, for their future professional lives;
- the building of resilience and further rigour into the education system;
- the protection of students, amongst other stakeholders, from the predatory global cheating services industry;
- robust, contextually appropriate structures across and throughout the higher education environment in which a culture of academic integrity can thrive;
- the shaping of a quality culture within our society, empowering, building trust, enabling self-esteem, embedding the core values of honesty and responsible active citizenship.

Research[3] is constantly reinforcing the message that online 'cheating services' provision is now a global business worth millions, if not billions, of dollars, and that it is not exclusive to any one type of student, discipline or geographic area. It is also a very dynamic industry which is both agile and responsive to opportunities to expand and diversify, demonstrated by the development of file-sharing sites as a type of contract cheating as well as the ever-evolving means by which these companies attempt to target vulnerable students.

In 2020, Cath Ellis spoke at a Quality & Qualifications Ireland (QQI) event in Dublin to an audience of higher education professionals. In this, she said that research in Australia had previously revealed that at least 4% of enrolled undergraduate students had used commercial cheating services and she asked participants to consider why this figure would be any different in Ireland or any other countries. This was followed by the statement that in her opinion, if HEIs were not reporting a similar percentage, this was

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[3] Including e.g. Guy Curtis et al (2021), TEQSA (2017), Sarah Eaton et al (2022), Phil Newton (2018)

not because it was not happening, but because there was a failure in detecting it.[4] Previously, in 2018, Phil Newton from Swansea University (UK) reported that commercial contract cheating in higher education has been growing exponentially from an historic average of 3.52%, and that at, as of 2018, his data indicated 15.7%, "[…] *potentially representing 31 million students around the world*" (Newton, 2018).

This may seem a high figure but there is little reason to doubt that it is, within margins, correct. Since this research, more has been published, which has posited the percentage at around 12-14% based on student self-reporting (Curtis et al, 2021). In some cases, especially since the COVID-19 period, some commentators report that it could even be as high as 20% as commercial cheating services have apparently become "*more aggressive in their promotional activities*" (TEQSA, 2024).

Triggers for this demand and growth have been multi-faceted and are possibly more complex than may initially appear. However, it is generally accepted that there are certain key factors which have a role in creating vulnerabilities, subsequently exploited by the cheating industry:

At a global level:

- the massification and commodification of third level education;
- the international movement of students, i.e. away from their support networks;
- the growth of students studying through a second language either in their home country or abroad;
- time poverty of students who also have to work, or have other demands on their time, such as caring responsibilities;
- the pressure on students to achieve at the highest level in a competitive environment for employment or further study.

At a national level:

- the modularisation of programmes;
- continuous assessment as opposed to exams;
- contract arrangements for academic staff;
- a lack of a commonly accepted understanding of academic integrity and what it encompasses.

At an institutional level:

- the relationship between teaching staff and students;
- clustering of continuous assessment deadlines, e.g. all are scheduled in the same week;
- a lack of policies written in language which is accessible to students;
- difficulty in accessing student support services due to under-resourcing, opening times, insufficient provision.

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[4] To read more about the business of contract cheating, see *The Infernal business of contract cheating: understanding the business processes and models of academic custom writing sites,* Ellis et al. International Journal for Educational Integrity (2018) 14:1 DOI 10.1007/s40979-017-0024-3

As artificial intelligence has emerged to join the mix of cheating opportunities, the academic integrity landscape has become more complex, as this diagram illustrates:
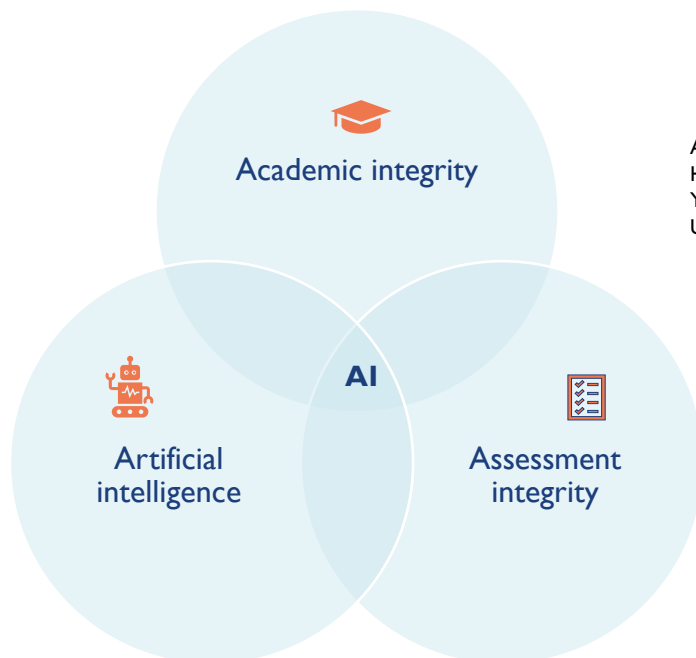
**Figure 2** – Academic integrity landscape with the three AI components

Although academic integrity and assessment integrity and the links between them have long been an accepted part of academic discourse, the addition of the third 'AI' component is more recent, with generative artificial intelligence tools becoming more convincing and more widely accessible. However, it is not yet clear whether this has led to students using these free tools instead of using contract cheating services. First indications suggest that it is not the case and that students prefer to pay for what they regard as a more reliable service, i.e. commercial services. This may also be due to not being aware of the real dangers of these engagements, as further indicated by TEQSA in a 2024 higher education sector alert in which they highlighted changes in activities of commercial cheating services warning that the commercial online service providers are becoming '*more aggressive*' and '*are more frequently targeting the students who use their services for blackmail and identity theft*'.

Whilst all three AI components are of significant interest discretely, perhaps the most interesting part of the diagram is where they intersect – how can we express this relationship in terms of quality assurance and what may quality assurance agencies expect from their stakeholders, primarily HEIs? And, in turn, what may HEIs and other stakeholders expect from quality assurance agencies to address this intersecting relationship? What are the implications of all of this for quality assurance agencies? How can systems and procedures meet the challenge of fostering a culture of academic integrity and simultaneously mitigate the threats to the higher education system?

There is a good deal to digest and reflect on in relation to the points above, and many jurisdictions are currently data poor, which restricts their ability to consider which approaches and policies to implement. This report can perhaps be regarded as an invitation to researchers to start to investigate academic integrity in their own jurisdictions taking, as the report recommends, a holistic and multi-stakeholder approach.

There is no question that actions are needed to:

- review and update academic integrity policies to reflect the current external environment (including European, national, regional, institutional)[5];
- rethink approaches to assessment to ensure assessments are not easily replicable and capture real learning that has taken place;
- explore how to protect students and others in the current higher education environment, both on campus and online, to empower and build resilience;
- peripheralise and disable the commercial cheating industry through actions from a global level to that of an individual staff member or student, including through collaboration and training.

Finally, we finish this section with four *Questions for Reflection*[6] and hope that these are useful in stimulating and guiding thinking within quality assurance agencies:

- Regarding higher education academic integrity, is there a national/regional/ institutional approach reflected in policies or legislation?
- If YES, what particular aspects of academic integrity are covered? If NO, are there discussions about academic integrity or any move to develop policy or legislation?
- What does your agency or institution do regarding academic integrity?
- What tools/resources do you need to safeguard academic integrity in your educational context?

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[5] See Cath Ellis & Kane Murdoch (2024) for a very interesting proposal on how to approach student cheating.
[6] Hackett, S. and Overdevest, Y., ENQA General Assembly, 2023

# PART 2: The Academic Integrity Working Group: research

## SCOPE AND METHODOLOGY

The following activities were conducted by the working group over a two-year period:

- establishing the scope of the research by determining the boundaries and extent of the study, defining its specific objectives, methods and limitations;
- selecting and considering relevant publications and initiatives regarding academic integrity both within and outside the European Higher Education Area (EHEA);
- conducting a mapping exercise in December 2021. The quality assurance agencies comprising the Working Group were interviewed about their perception of academic integrity in their jurisdiction, which resulted in summaries of all responses for each question;
- conducting an exploratory survey to ENQA members and affiliates in July 2022. The results and conclusions of this study are presented in the results chapter of this report. The full text of the survey is included in Annex 1;
- conducting in-depth interviews on the basis of an initial analysis of the survey results. The Working Group members engaged with a selection of quality assurance agencies about the preliminary findings, in order to clarify particular issues, and to attempt to establish commonalities and patterns.

Preliminary findings on the basis of the written survey were presented at the ENQA General Assembly in Stockholm (Sweden) in October 2022,[7] during which key findings from the survey and resulting provisional recommendations were shared. At the following ENQA General Assembly in Dublin (Ireland) in October 2023, representatives of the Working Group delivered a dissemination and discussion workshop drawing on the outcomes of the in-depth interviews[8]. The participants in the workshop explored existing and prospective practices in academic integrity in a variety of contexts across the EHEA.

## ENQA MEMBERS AND AFFILIATES WHO PARTICIPATED IN THE STUDY

Fifty-nine agencies responded to the survey, including 41 ENQA members and 18 ENQA affiliates, well over half of those approached. Respondent agencies formed a diverse group in terms of type of agency, type of external quality assurance and location.

Specifically in terms of geographic diversity, 32 countries of the EHEA were represented in this study: Armenia, Austria, Belgium (both Flemish and French-speaking community), Bulgaria, Croatia, Estonia, France, Germany, Greece, the Holy See, Hungary, Iceland, Ireland, Italy, Kazakhstan, Latvia, Lithuania, the Republic of North Macedonia, Malta, Republic of Moldova, the Netherlands, Norway, Portugal, Russian Federation,[9] Slovakia, Slovenia, Spain, Sweden, Switzerland, Türkiye, the United Kingdom and Ukraine.

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[7] The closing plenary was given jointly by Helen Gniel, Director, Higher Education Integrity Unit, TEQSA and two members of the Working Group.
"Legislate, centralise and resource: The Australian model for supporting academic integrity" by Helen Gniel, TEQSA (Australia)
"The Academic integrity survey: findings & provisional recommendations" by Sue Hackett, QQI (Ireland) and Yvonne Overdevest, NVAO (the Netherlands), ENQA's working group on academic integrity.
[8] Academic integrity: outcomes of the ENQA working group (Sue Hackett, QQI and Yvonne Overdevest, NVAO).
[9] The survey was disseminated before the suspension of the Russian Federation from the EHEA and the subsequent suspension of Russian members and affiliates from ENQA.

**Figure 3** – Geographical spread survey respondents

All except one respondent conducted most of their quality assurance processes within the system in which they are geographically located, while one respondent was not linked to any specific national jurisdiction but operated internationally.

## INTENTIONS AND FINDINGS OF THE SURVEY

As stated above, the main aims of the survey were to:

- identify the levels of awareness and activity across the membership in relation to academic integrity;
- establish what is happening currently regarding academic integrity and what is planned for the future;
- identify examples of good practices.

The intended outcome of the survey was to produce a report with practical advice for members and affiliates on how to support academic integrity and address academic misconduct, and the intended impact of this work was to foster reflection and active consideration of approaches to academic integrity in the EHEA, from a quality assurance perspective.

The survey questions were developed on the basis of desk research into the subject, the results of the mapping exercise among members of the Working Group, and reflection on existing approaches to safeguarding and upholding academic integrity in jurisdictions both within and outside the EHEA.

The questions were grouped into three sections, namely:

- academic Integrity from the perspective of the country or system in which an agency is most active;
- academic integrity from an agency perspective;
- support activities to encourage and enable academic integrity in higher education - ideas and ideals.

**Academic Integrity from the perspective of the country or system in which an agency is most active**

Part A of the survey focussed on academic integrity from the perspective of the country or system in which an agency is most active. Respondents provided information about current practice in their respective jurisdictions. Input was provided first as to whether there were national policies and/or legislation in place, and if so, what were the responsibilities of the quality assurance agencies.

Two-thirds of respondents stated there was a national approach to academic integrity. A majority reported having legislation covering academic misconduct such as plagiarism (85%) and unethical research (60%). Just under half confirmed that averting manipulation of data was covered in national policy (49%). Over a third of the agencies reported that their national legislation took contract cheating into account (39%). Less commonly covered were misrepresentation, collusion and file-sharing, amongst others.

| Aspects of academic misconduct covered by legislation | Number of responses | % of responses |
|---|---|---|
| Plagiarism | 33 | 84,50% |
| Unethical research | 23 | 59% |
| Manipulation of data | 19 | 48,50% |
| Contract cheating | 15 | 38,50% |
| Other | 14 | 36% |
| Misrepresentation | 11 | 28% |
| Collusion | 7 | 18% |
| File sharing | 5 | 13% |

**Table 1** – Survey responses to Part A: Academic Integrity from the perspective of the country or system in which your agency is most active

A number of themes emerged from this part of the survey:

- the majority of respondents focus on plagiarism as the main aspect of academic integrity;
- there is a wide range of descriptions of academic integrity and to whom it applies;
- there is a perceived lack of common understanding of what constitutes academic integrity/misconduct;
- there is guidance and support provided by some agencies, but little cross-border/cross-agency collaboration;
- the drive for academic integrity needs to come from senior leadership and regulatory bodies of HEIs;
- a variety of methods of recording academic misconduct are used.

**Academic integrity from an agency perspective**

The questions in Part B of the survey produced the following main findings:

- two thirds of the respondents answered in the affirmative regarding having measures in place enabling and encouraging the upholding of higher education academic integrity;
- just over half of the agencies reported that information regarding academic misconduct is made available to higher education stakeholders;
- three-quarters of the agencies however do not have accessible databases regarding research into academic misconduct.

Q1 - Does your agency currently take measures to enable and encourage the upholding of HE academic integrity?

Q2 - Is information regarding academic misconduct made available for the HE stakeholders by the agency?

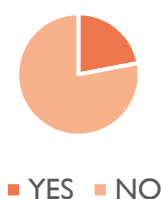Q3 - Are there any accessible databases in your jurisdiction regarding research into academic misconduct?

■ YES  ■ NO

■ YES  ■ NO

■ YES  ■ NO

**Figure 4** – Key findings from Part B: Academic integrity from an agency perspective[10] [11] [12]

**Support activities to encourage and enable academic integrity in higher education - ideas and ideals**

Part C of the survey explored what support activities and practices agencies ideally would like to see established to encourage and enable academic integrity in higher education. The responses can be summarised as follows:

- a majority would expect HEIs to have some training for students and staff to promote academic integrity and discourage academic misconduct;
- across the responses, a wide range of descriptions and definitions of academic integrity and related terms are used;
- research would be welcomed at national and international level to support policy development;
- there was general support for the idea of disrupting cheating companies' business models;
- less than a third of the agencies saw a problem represented by social media platforms being used as a means of cheating companies communicating with learners.

**Suggestions for actions resulting from the survey results**

An analysis of the themes and findings above resulted in a number of suggested actions, namely:

- delineate plagiarism as one type of academic misconduct and educate stakeholders about other forms of academic misconduct;

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[10] Responses to Q1: Yes 33/59 (56%), No 19/59 (32%), no answer 7/59 (12%)
[11] Responses to Q2: Yes 27/59 (46%), No 24/59 (41%), no answer 8/59 (13%)
[12] Responses to Q3: Yes 13/59 (22%), No 46/59 (78%)

- explore what academic integrity and academic misconduct actually mean in a higher education context and support this with a set of commonly agreed definitions (there are glossaries available – see NAIN[13] Academic Integrity: National Principles & Lexicon of Common Terms; ENAI Glossary of Terms);
- provide training for staff, both at institutions and agencies, and for students on what constitutes academic misconduct and how it can be avoided;
- encourage international, national and regional collaboration amongst HEIs, agencies and other stakeholders to develop a collective approach to disrupting the business models of the commercial cheating companies;
- provide guidance on how academic misconduct may be researched and recorded by quality assurance agencies and by HEIs.

These suggested actions have been translated into concrete recommendations in the final section.

**Need for additional data**

As stated above, on the basis of a number of intriguing responses, the working group conducted a number of in-depth interviews with agency representatives in order to learn more about what academic integrity measures and practices are implemented and why. The working group also strongly suspected that respondents to the survey may not always have had a common understanding of what was meant by academic integrity, or terms such as 'contract cheating', 'file sharing' or 'cheating companies'. This would naturally impact answers to the survey questions. Nine agencies were selected and contacted by email, whereupon seven agreed to an interview. Each interview took approximately 30 minutes and involved one to three agency staff at various levels of the organisation. The following three general questions were posed as well as several questions specifically relating to the agency's responses to the survey:

Q1  *How does your agency define 'academic integrity' for your context?*

Q2  *What role do you think your agency should play in safeguarding academic integrity across your higher education system?*

Q3  *To raise awareness amongst the community/ stakeholders, what kind of collaboration is needed to foster awareness of academic integrity and make advancements?*

The interviews were conducted in the second and third quarter of 2023, and with permission of the interviewees were recorded for subsequent transcription. A subcommittee of the working group analysed the interviews and collated the most significant and shared responses. Again, there were several recurring themes and topics which have been grouped into findings and conclusions at three levels: at European level, at national level, and at institutional level.

**Recurring points from the interviews with agencies – at European level**

From the interviews, the working group concluded that agencies are aware that there is a strong relationship between the concept of academic freedom and academic integrity. Regarding academic integrity, agencies indicated a limited awareness of intersections with other European level initiatives such as the work carried out by the Bologna Follow-Up Group (BFUG).

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[13] The Irish National Academic Integrity Network, hosted online by Quality & Qualifications Ireland

Another example mentioned was The Council of Europe Platform on Ethics, Transparency and Integrity in Education (ETINED[14]) which recognises that

> *"There is currently worldwide concern over corruption in education. This concern touches all Member States and all levels of education".*

This group is trying to address the challenge of academic misconduct through a European dialogue.

A number of those interviewed indicated optimism with the concept of 'from cradle to grave' academic integrity awareness raising and education as demonstrated in the ETINED approach. The interviewers discovered a common understanding of core values as a fundamental part of integrity and a shared realisation of the necessity of active partnership with students.

**Recurring points from the interviews with agencies – at national level**
While higher education stakeholders in some EHEA countries are able to refer to legislation which benchmarks the national parameters and enables all stakeholders to know where the 'red line' is drawn, others operate in contexts (mostly) lacking in legislation pertaining to academic integrity or academic misconduct. A number of those interviewed indicated that not only did they miss explicit academic integrity legislation, but they would also value specific guidance for institutions in order to build openness, transparency and trust. Some countries or regions where policies and procedures are in place have specific guidance for institutions on building openness, transparency and trust, and yet others indicate a desire for this. Two other aspects emerged as ideals – specific guidance that provides a safeguard for standards and qualifications, and that the education sector in general consider what may be happening prior to entry to higher education, i.e. at secondary education level, or earlier. A focus on academic integrity in higher education is gradually being acknowledged as coming too late insofar as damaging habits may already have been formed by then.

Collaboration was a recurring point in the interviews. A number of responses reflected on the remit of agencies, and the level of cooperation within the broader educational sector. Safeguarding academic integrity goes beyond the protocols and processes in the context higher education. Remits could be expanded or relationships with other sector bodies strengthened to include educational contexts prior to and alongside formal higher education.

**Recurring points from the interviews with agencies – at institutional level**
As above, those spoken to expressed their need for legislation that would benchmark national parameters, that would in turn embed the responsibility for fostering and safeguarding academic integrity in HEIs. The view was frequently expressed that while providers might be individually and voluntarily developing and implementing academic integrity policies, there are real risks associated with this approach. National legislation would ensure uniformity and consistency, as well as creating more opportunity for collaboration between higher education providers, collection of data in order to review the efficacy of policies and cooperation of providers in the broader education sector. Subsequently, institutions could nominate academic integrity officers or establish offices, that, in turn, would train staff and students. With strenuous and accessible policy frameworks in place, institutions can progress toward more innovative pedagogical and assessment approaches, approaches that may both create cultures of academic integrity and in time see a meaningful reduction in breaches to academic integrity. An extra dimension, and challenge, at institutional level, is that of transnational education, where European providers operate abroad in

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[14] ETINED https://www.coe.int/en/web/ethics-transparency-integrity-in-education

educational contexts where students and staff might have differing cultural (mis)understandings of academic integrity.

A significant outcome of the diverse interviews, as with the survey, is that there is no single understanding of what academic integrity encompasses. Where there is legislation affecting educational activities at institutions, this too, varies greatly, though it is commonly viewed as covering only research ethics and plagiarism.

**Recommendations**

From the data collected by the ENQA Working Group, from conversations which occurred as a result of the talks given at ENQA meetings, from further exploration of issues raised as a result of these interactions, the following recommendations are made at a macro level

1) Agree upon a commonly understood terminology - adoption of one of the referenced lexicons/ glossaries is recommended.
2) From the four emergent themes:
    a. further develop an understanding of the multi-dimensional academic integrity landscape at European and national levels in particular,
    b. develop a heightened understanding of what academic integrity is, its challenges and issues, possibly beginning with training/awareness-raising available to agency representatives,
    c. plan and carry out more research, ideally through a collaborative approach, to further understand the threats and identify ways forward to mitigate or peripheralise these;
    d. rethink assessment to enable students to engage with all assessments to reflect their learning,
    e. create policies which are robust, inclusive and fit-for-purpose re academic integrity, artificial intelligence and assessment in higher education, enabling positive solutions for students,
    f. develop a common system for reporting and managing suspected academic misconduct,
    g. design and implement a collaborative and multi-faceted approach to disrupting the commercial cheating services industry, identifying the perpetrators.

3) Include students as core partners in developing the above approaches which reflect their needs, the threats to their academic experience, and their contexts.
4) Take action to gain other stakeholders' commitment within HEI senior management in particular, and across the higher education sector at national levels, i.e. at government level.
5) Advise relevant government agencies as to the challenges and explore ways in which risks to the higher education system can be mitigated through mutual policy creation and actions.

Specifically, quality assurance agency may consider the following actions to introduce or further reinforce academic integrity standards and benchmarks in their work, depending on the type of agency and remit in the systems in which they work. These will have the further effect of enabling capacity building and the fostering of a culture of integrity and ethical behaviour:

- include explicit academic integrity standards in the agency standards. This should therefore ensure that HEIs reflect these in their policies, guidelines and procedures;
- explore how national legislation can provide protection, and whether it is possible for quality assurance agencies to have a legal role in prosecuting 'bad actors'. i.e. those that sell 'cheating'

services to students (e.g., QQI Act Section 43a[15]; UK Higher Education Cheating Services Bill 2021). It should be kept in mind that this remit is currently rare for agencies and that enforcing it is resource intensive.  It may be more efficient to lobby and provide input into national legal frameworks;

- provide up-to-date information[16] and guidance for all stakeholders on a regular basis, particularly focusing on students and HEI staff, with practical advice on how to promote academic integrity as a cross-disciplinary, whole institution function, including how to mitigate and reduce risk of academic misconduct (see TEQSA, ICAI, ENAI, NAIN, AAIN[17], INQAAHE, for toolkits and resources offering a range of training, awareness-raising and communication suggestions);
- share and develop common good practices through collaboration with other quality assurance agencies and explore solutions that may be at a global or cross-border level (see the Global Academic Integrity Network[18] (GAIN).

**Looking forward…**

There is no question that the issues as revealed and outlined in this report, have far-reaching implications for higher education across the EHEA.  In focusing on the ultimate aim of creating and fostering a European culture of academic integrity, there is also a commitment to addressing the threats to this, to developing standards which establish requirements in this area, to resourcing this in a manner which is robust and effective and has a positive, sustainable impact.

As highlighted in the research data, as a starting point, training and the establishment of a common understanding are needed and could provide a sound foundation from which agencies could develop their own approaches.  Alternatively, there may be real benefit in taking this further to work collaboratively on a common European policy and development plan.

It is clear that this issue, and, in particular, the external threats to our higher education system, is not going to go away and inaction, looking the other way, is not a viable option.

So, what could we do?

A proposal from this report is to establish a cross-sectoral advisory group on academic integrity, including ENQA members and participants from the other European and international agencies, e.g., the Council of Europe (ETINED), UNESCO, European Students' Union (ESU), to work together, with an established European or international body providing a stable foundation, funded and resourced over a specified time period. This group could usefully explore the role of the ESG in relation to academic integrity and all that this entails, as well as support agencies in further developing their approach to academic integrity (maybe including assessment integrity and artificial intelligence) in relation to national and regional frameworks.

This group would have a remit to consider the following key aspects:

- explore all the options and provide training for agency staff;
- track the ongoing developments in the academic integrity field and share these with agencies;
- act as a hub for research activities taking place across Europe and globally on academic integrity areas, i.e. able to act as a communicator of current and emerging trends and threats, what is taking place, where and with whom;

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[15] Qualifications & Quality Assurance (Education & Training) Act (2012) (revised 2014)
[16] The online newsletter, The Cheat Sheet, produced by Derek Newton, is a useful informant.
[17] Australasian Academic Integrity Network
[18] The Global Academic Integrity Network (GAIN) www.globalacademicintegritynetwork.network

- engage with other agencies regarding their work in this area (UNESCO, TEQSA, ETINED, ICAI, ENAI, etc);
- propose an approach and/or a series of actions in combatting the commercial cheating industry;
- advise on addressing academic integrity in higher education within the European and global, context.

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# Annex 1: Survey

## THE ENQA MEMBERS' SURVEY ON ACADEMIC INTEGRITY
Developed by the ENQA Academic Integrity Working Group: June 2022

This survey is being conducted as a key part of the work of the ENQA Academic Integrity Working Group and has been sent to all ENQA member and affiliate agencies for their consideration and completion. The objective of the project is to provide guidance for ENQA Members and Affiliates, exploring the extent of the threat to academic integrity arising from various forms of academic misconduct, including the use by students of contract cheating companies. A key outcome will be practical advice for ENQA Members and Affiliates on how to support academic integrity and address academic misconduct.

This survey aims to establish what is happening across Europe and beyond concerning academic integrity, and to identify and share proven practices taking place - your responses will provide us with vital information on this.   Ultimately, a report with guidance and recommendations for ENQA Members and Affiliates will be published and made available in 2023.

The Working Group has adopted the following definition for 'academic integrity', taken from the International Center of Academic Integrity (ICAI):

"*The International Center for Academic integrity defines academic integrity as a commitment, even in the face of adversity, to six fundamental values of honesty, trust, fairness, respect, responsibility and courage*". It implies "*compliance with ethical and professional principles, standards and practices by individuals or institutions in education, research and scholarship.*" ('Fundamental Values', *Academic Integrity*, Albany, NY, USA, Fundamental Values [academicintegrity.org] (accessed 18 May 2022).

Please take a few minutes to fill out this ENQA survey. It should take no longer than 15-20 minutes to complete! The deadline to fill it in is **10 August**.

**Thank you in advance for helping us with this very important issue.**

Agency name:

Country in which your agency is located:

**PART A: Academic integrity from the perspective of the country or system in which your agency is most active**

1) Regarding higher education (HE) academic integrity, is there a national approach reflected in national policies or legislation in the country or system in which your agency is most active?
   - YES
   - NO
   - The agency is not active in one particular country or system (if this option is chosen the rest of the questions in Part A are not applicable)

a) If YES, what particular aspects of academic misconduct does the policy and/or legislation cover? Please tick all that apply:
   - o  Contract cheating
   - o  File-sharing
   - o  Plagiarism
   - o  Misrepresentation
   - o  Manipulation of data

- o Collusion
- o Unethical research
- o Other (please add):

b) If YES, *(there are national policies and/ or legislation regarding HE academic integrity)*, what are the responsibilities of HEIs' academic staff and professional and support staff? (please respond in max. 100 words)

c) If YES, *(there are national policies and /or legislation regarding HE academic integrity)*, what are the responsibilities of enrolled students or student representatives? (please respond in max. 100 words)

d) If YES, *(there are national policies and /or legislation regarding HE academic integrity)*, what are the responsibilities of academic heads of department and senior leaders? (please respond in max. 100 words)

e) If YES, what are the responsibilities of quality assurance agencies? (please respond in max. 100 words)

f) If NO, are there discussions at national/system level about academic integrity?
   - ▪ YES
   - ▪ NO

   - If Yes, what issues and approaches are under discussion?

2) Does your jurisdiction have any national policies, legislation or any other type of requirements related to academic integrity that other agencies could usefully consider when developing their own approach? (please respond in max. 100 words)

## PART B: Academic integrity from an agency perspective

1) Does your agency currently take measures to enable and encourage the upholding of HE academic integrity?
   - ▪ YES
   - ▪ NO

   a) If YES, which measures are being taken to prevent or combat academic misconduct

2) Is information regarding academic misconduct made available for HE stakeholders by the agency?
   - ▪ YES
   - ▪ NO

   If YES, where?

3) Are there any accessible databases, held either by your agency or by another body in your jurisdiction, regarding research into academic misconduct?
   - ▪ YES
   - ▪ NO

   If YES, please give some information about these databases and comment on the usefulness of this data in providing insights into academic misconduct. (please respond in max. 100 words)

**PART C: Support activities to encourage and enable academic integrity in higher education.**

1) Please complete the sentence below.
   *The greatest threat to academic integrity in higher education is currently ….*

2) What tools/ resources are needed in order for your agency to promote the upholding of academic integrity? (please select all options that apply)
   - o Provide training and support to encourage assessment diversity
   - o Develop an understanding of what data plagiarism software can provide
   - o Develop expertise in online proctoring and identification systems
   - o Provide academic integrity training for staff and students
   - o Other (please add):

3) What activities can agencies undertake, other than institutional and programme level review, to promote academic integrity? (please select all options that apply)
   - o Develop guidance for higher education institution and student organisations
   - o Work with governments, state agencies, e.g., on legislation addressing misconduct
   - o Convene expert sector-level working groups to develop resources
   - o Convene groups of institutions to develop shared approaches and commitments
   - o Other (please add)

4) What questions should quality assurance agencies be asking higher education institutions regarding academic integrity?  (please respond in max. 100 words)

5) What approaches can be taken to disrupt the business models of companies offering contract cheating services? (please select all options that apply)
   - o Provide information sessions for staff, students and others about the business models of these companies and the risks inherent in collaborating with them
   - o Pressurise social media platforms to stop advertising cheating companies
   - o Pressurise online payment companies to stop processing payments to cheating companies
   - o Collaborate with other higher education institutions to develop a collective approach
   - o Use the media to educate the public regarding online cheating companies
   - o Develop Artificial Intelligence Bots to counteract the ones from cheating companies
   - o Other (please add)

6) What would you expect higher education institutions to have in place in order to effectively promote academic integrity and discourage academic misconduct? (please select all options that apply)
   - o Provide courses on ethics, academic writing, etc. in mandatory orientation programmes for staff and students
   - o Conduct regular training for academic staff and students
   - o Adopt anti-plagiarism software
   - o Encourage research at the national and international level
   - o Develop policies and procedures which provide students with alternatives to using cheating companies

- Other (please add)

7) What actions would your agency like to be able to take to encourage the upholding of academic integrity and discourage academic misconduct in the jurisdiction in which it works? (please respond in max 100 words)

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**European Association for
Quality Assurance in Higher Education**