

Sector | Higher Education

USING THIS REVIEW

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INTRODUCTION

Corruption in higher education is growing global problem, in both developed and developing countries. It is estimated that fraud in international higher education is a \$1.5 billion to \$2.5 billion business.[1]The corruption types in higher education range from grand corruption involving politicians (e.g. unearned degrees) and diversion of higher education budgets, to bureaucratic and administrative corruption in university management, to academic dishonesty and to sextortion. One factor that makes higher education increasingly vulnerable to corruption is that a university degree is now, more than ever, a prerequisite for access to good jobs, positions of power and other benefits. Moreover, the most prestigious higher education institutions are very exclusive and only accept a small percentage of the myriad applications they receive.[2]The risks extend to faculty as well, as the drive to publish, have good rankings and attract research funding offers incentives to fudge numbers or falsify research.[3]

There is no magic bullet that can cure the problem in one go. Nonetheless, there are several actions that governments, universities and stakeholders can implement to tackle particular corruption problems. Although universities operate under political conditions that may make it difficult to be autonomous and push back against the corrupting influence of politicians, there are many possibilities and entry points for measures against cheating, sexual harassment, embezzlement and other abuses.

Why it matters

Higher education is the source of skilled labour and leadership; it has the responsibility to produce graduates who can change and improve the status quo. Itis one of the most important societal mechanisms to increase social trust. [4] The sector is pivotal in breaking the vicious cycle of corruption.

Corrupt practices in higher education break the link between personal effort and anticipation of reward, proliferating "ends justify means" norms that can further erode integrity and cohesion in the wider society. Employees and students come to believe that personal success comes, not through merit and hard work, but through cutting corners. [5] Worryingly, a recent survey of 7,000 young people (18-35 years of age) in East Africa found that 60% admired people who used get-rich-quick schemes. More than half believed it does not matter how one makes money while 53% said they would do anything to get money. 37% would take or give a bribe and 35% believed there is nothing wrong with corruption. [6]

Universities sit at the apex of our knowledge-based societies, and for this reason are imbued with academic freedom and institutional autonomy so that they can engage in scientific reflection and knowledge production. [7] When higher education is infiltrated by corrupt practices, the very foundations on which societies are based are threatened. "Cheating that makes exams and degrees worthless reflects the failed internalisation of truth and honesty rules. When it also aims at obtaining a license to teach or practice medicine, it turns into the betraying of co-nationals." [8] Corruption threatens the legitimacy of universities as knowledge producing and training institutions. Universities' political and corporate liaisons may create conflicts of interest and undermine the autonomy, academic freedom and impartiality of higher education institutions. The raison d'etre of universities relates to humanity's search for truth, order, meaning and welfare. [9] Corruption undermines these values, and poses an existential threat to universities and to society in general.

Corruption in the higher education sector is, of course not an isolated phenomenon. Nonetheless, many of the corruption types are specific to higher education and can be successfully tackled at a sector or university level, as we show here.

AUTHORS AND CONTRIBUTORS

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1. Corruption types in higher education

Guidance summary: STEP 1 Corruption types & context

We suggest you start by understanding in detail the different corruption types that you are faced with. You can do this in the following way:

- 1. Look at the template of sector corruption types in our review and adjust these according to your situation.
- 2. Gather available data. We suggest that you do this first at a macro level, to get a sense of which corruption issues are big or small across the sector, across countries, across different regions. Often there is a lot of such macro data publicly available. Then, gather available data at the micro level, local to you.
- 3. Decide if it would help to do a formal analysis of the corruption types and the levels of corruption risk. This takes time but gives you a thorough baseline for your reforms. It also serves to show the level of danger and damage from corruption to staff and to the public.
- 4. Consider doing an analysis of the levels of support and opposition that you can expect. This is called a 'political economy analysis'.
- 5. Prepare for the later step in which you develop your strategy (Step 4) by thinking about which the best 'entry points' are likely to be certain corruption types, regardless of scale, merit being tackled first because they are the most likely to build momentum and/or enable further reform. This choice of starting point is hugely context dependent.

You can read more guidance on Step 1 here.

1.1 TYPOLOGY

The one-page diagram below summarises the 24 specific corruption types that practitioners have identified in higher education. It is laid out under four category headings: political corruption, administrative and bureaucratic corruption, academic fraud and cheating, and sextortion.

Corruption typology - Higher Education

POLITICAL CORRUPTION

- 1. Politicians promote private universities for political and ideological purposes
- Diversion of higher education budgets
- Regime involvement in university affairs including appointments
- Awarding unearned degrees to politicians, their relatives and cronies
- Money in student politics

ADMINISTRATIVE & BUREAUCRATIC CORRUPTION

- In accreditation, licences
- In selection/ admission of students
- In accommodation management
- In international student recruitment
- 10. Nepotism and favouritism in appointing and promoting staff
- 11. Staff absenteeism12. Embezzlement of research grants and operational funds
- 13. Fraud in procurement

ACADEMIC FRAUD & CHEATING

- 14. Plagiarism
- 15. Essay and dissertation mills
- 16. Falsification or research data and results
- 17. Fake journals and peer reviews
- 18. Exam leakages
- 19. Using unauthorized material in exams
- 20. Impersonation
- 21. Hacking Test banks
- 22. Bribe-influenced alteration of marks on exam scripts or in the exam results database
- 23. Degree Mills / Certificate forgery

SEXTORTION & SEXUAL HARASSMENT

24. Unwelcome sexual advances, requests for sexual favours or unwanted physical, verbal or non-verbal conduct of a sexual nature when submission for such conduct is made an explicit or implicit condition for employment or academic achievement.

Here is the typology also in tabular form:

Category	Corruption type – higher education
	Politicians promote private universities for political and ideological purposes
Political	2. Diversion of higher education budgets
corruption	3. Regime involvement in university affairs including
	appointments

	 4. Awarding unearned degrees to politicians, their relatives and cronies 5. Money in student politics
Administrative and bureaucratic corruption	 Bribery and extortion in accreditation and licences Bribery in selection and admission of students Bribery in accommodation management Bribery in international student recruitment Nepotism and favouritism in appointing and promoting academic and administrative staff Staff absenteeism Embezzlement of research grants and operational funds Fraud in procurement
Academic fraud and cheating	 Plagiarism Essay and dissertation mills Falsification or research data and results Fake journals and peer reviews Exam leakages Using unauthorised material in exams Impersonation Hacking Test banks Bribe-influenced alteration of marks on exam scripts or in the exam results database Degree Mills / Certificate forgery
Sextortion	24. Unwelcome sexual advances, requests for sexual favours or unwanted physical, verbal or non-verbal conduct of a sexual nature when submission for such conduct is made an explicit or implicit condition for employment or academic achievement.

Each of the corruption types is discussed below.

1.2 POLITICAL CORRUPTION IN HIGHER EDUCATION

Grand corruption involving political manipulation of university affairs is common. Ibrahimi (2014), discussing patronage politics in higher education in Afghanistan, observes that the role of patronage networks in universities is tied to the role they play in the "political socialization" of the emerging

educated class.[10]University campuses in developing countries are microcosms and drivers of the political and social environment of the country, and hence it is not surprising that governments and ruling parties are often involved in the running of universities.

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A sinister form of political corruption in some post-communist societies involved states deliberately underpaying salaries so as to force employees to get involved in corruption to supplement their income, and then collect evidence of wrong doing and coerce them into compliance (supporting the regime).[11] This ensured the position of universities as tools of political socialization and enabled regimes to sustain themselves. Subsequently, many academics broke ranks and took up positions of power at state or local level or in the military and security apparatus.[12]

Ibrahimi's study on higher education in Afghanistan provides a view of private higher educational institutes as extensions of political and religious patronage networks, especially when politicians and religious figures sponsor a significant number of such institutions as a means of cultivating and extending their support base among the country's emerging educated class.[13]She argues that while investment in education by political and religious protagonists could be a positive development, there are multiple risks of doing this in poorly regulated, post-conflict environment. First, it distorts the competitive nature of the market for higher education in which investors should expect to maximize profit based on the quality of their education and their credibility. The emergence of new institutes that have massive resources and lower fees can place significant strain on other institutes that are hoping to generate revenues through the quality of their service. Such institutions with connections to political and religious networks can also jeopardise the integrity and credibility of the higher education system when universities owned by politicians and the "rich and famous" achieve accreditation despite not meeting the minimum requirements.[14]

The institutions become a channel through which power holders can strengthen their support base among the country's educated class. They can also use the institution to further their political and ideological interests, embracing narrow agendas directed towards particular audiences. The politicization of higher education in this manner can have serious implications for peace, democracy and stability in fragile states where various groups

continue to vie for power, especially when institutions become centres of indoctrination.[15]

The politicization of higher education is not limited to the establishment and sponsorship of private universities by elites but extends to political involvement in the appointment of university managers. Heads of State are often Chancellors of public universities. [16] Student affairs in many public universities in Africa mirror politics at the national level and university politics is so politicized that students cannot achieve leadership positions unless they are endorsed by the ruling party. [17] The use of money in student politics echoes what happens at national level elections, with displays of largesse and various forms of vote buying and coercion manifesting in student elections. [18]

Other examples of grand corruption include the lack of transparency in the award of research grants and scholarships, as well as budget distortions and diversion of money for higher education to other government activities. In Slovakia, money meant for university science and research was redistributed to private companies that had no prior experience in research. [19]

Another type of political corruption involves granting unearned credentials and qualifications to politicians, their kin and cronies. The controversial award of a PhD to Grace Mugabe, wife of former present of Zimbabwe, Robert Mugabe, is one such example.[20]Uganda's first lady Janet Museveni, was allegedly awarded a degree in education despite not fulfilling the requirement for teaching practice. When she was admitted as a student, she did not go through the usual application process and the admission requirements were waived for her.[21]In Mexico, a political patron was awarded degrees in Orthodontistry and law that he did not study for.[22] In Kenya, corrupt university officials graduated prominent, but academically unqualified, students from abbreviated or non-existent study programs. In 2017, the regulator of higher education in Kenya, the Commission for University Education, asked a number of universities to revoke the illegitimately awarded degrees.[23]In Uganda, Busoga University reportedly awarded more than one thousand degrees to (mostly) Sudanese government officials in exchange for a "premium-tuition" fee of USD 1,000 whereas average fees are USD 300 per year. Many were admitted despite the fact that they did not meet the admission criteria and graduated in "fast track" two-month degree programmes. The officials reportedly needed the degrees to maintain their positions in the government. The Uganda National Council for Higher Educations (NCHE) is investigating the incident. [24]

1.3 ADMINISTRATIVE AND BUREAUCRATIC CORRUPTION

1.3.1 Accreditation and licensing

The liberalization of higher education in many developing countries during the 1990s led to a mushrooming of private institutions offering new degree programmes. However, the accreditation system was slow to catch up with the changes. Much of it was still controlled by senior academics from public institutions who had an interest in preventing competition. In cases where degrees were the foundations for a professional license, the stakes for accreditation were high, creating incentives for bribery and extortion in the accreditation process.[25]

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Bribery in accreditation is especially problematic because it spawns a host of other types of academic corruption and creates a vicious cycle of related ills. For instance, it leads to the accreditation of institutions that do not have the staff or facilities (classrooms, libraries, internet access, etc.) required to provide a sound education, leading to a lowering of professional standards and a widening of the gap between knowledge and skills on one hand and labour market requirements on the other. Some universities, having bribed to achieve accreditation, lowered their admission requirements and admitted students who had not passed the requisite secondary school examinations. Such students are of course, more liable to lie and cheat their way through assessments and examinations, as they simply cannot cope with the standard at tertiary level. In addition, teaching staff are under pressure to lower pass marks, as the alternative would be to discontinue students, leading to a loss of reputation and income for the institution.

The demand for higher education, combined with lax regulation weakened even further by corruption also created a situation where universities created duplicate programmes under different titles; for instance, bachelors' degrees in business studies, commerce or entrepreneurship had different titles but similar content, all offered by the same university. Sometimes the admission requirements differ, but the overall incentive is to attract and enrol as many students as possible in order to maximize income. This duplication of programmes, as well as the factors mentioned above, creates an over-supply of unemployable graduates, with profound social, political and economic implications for societies.

1.3.2 Selection and Admission of Students

Corruption can taint selection and admission to university whether it is highly decentralized and controlled by individual faculty or centralized and controlled by a single body. Bribery can earn a pass mark, or papers may be leaked in advance to give some students an unfair advantage. A bribe can secure *carte blanche* admission for a student who does not even qualify to be in higher education. In India, in 2015, the authorities bust a crime ring in Madhya Pradesh led by an assistant professor who was working with officials from the examinations board. The ring had helped more than 2,000 students to get admitted into medical school by unlawful means. They sold examination questions, facilitated "grade improvements," and provided student impersonators to take admissions for a fee of more than USD 15,000 per student. [26]

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In some universities, first year admissions are also blighted by accommodation rackets with bribery and extortion for places in halls of residence and hostels. [27] This has been fostered by the rise in student numbers without a corresponding match in housing facilities for students. Wardens, custodians, resident tutors and student leaders connive to extort money from first year students who are desperate for accommodation on campus or close by.

The internationalization of higher education has "exported" corruption in the admissions process, even to countries such as Australia that achieve high scores on Transparency International's Corruption Perception Index and are not regarded as endemically or systemically corrupt. The National Association for College and Admission Counselling (NACAC) based in the USA states that international student enrolments at institutions of higher education have nearly quadrupled over the past three decades, from 1.1 million in 1985 to approximately 4.3 million in 2011. The number is probably higher now, and the international student population will probably surpass 7 million by 2025.[28]NACA further says that there are over 20,000 recruitment agencies worldwide funnelling students to countries like Australia, the U.K., and, in recent years, the U.S., where thirty percent of universities may be using agents for undergraduate admissions.[29]

Unfortunately, the system, based on commissions calculated according per capita, has created incentives for corruption. Sixty-one per cent of U.S. admissions directors surveyed in 2013 believed that agents help "international applicants fabricate parts of their applications." [30] In 2011, the Australian

government blocked over 200 unscrupulous agents from India, China, and Australia from submitting visa applications because they submitted fraudulent information in support of student visa applications.[31]

The fraud involved in international student recruitment has also spawned cheating in English language proficiency tests, online cheating sites selling assignments or providing "file sharing" facilities, plagiarism, cheating and fraud in examinations. This is because many international students for whom English is a second or even third language, and who might have lied about their abilities in their applications, struggle to keep up with the linguistic and academic demands of their courses. [32]

1.3.3 Recruitment, management and promotion of academic and administrative staff

Nepotism and favouritism in the recruitment and promotion of academic and non-academic staff at institutions of higher education makes a mockery of meritocracy and may affect the quality of teaching and research negatively. A survey of university students in Ghana and Nigeria perceived that favouritism and nepotism were among the major forms of corruption prevailing in higher education institutions.[33] Hiring of academic staff not based on merit puts the quality of higher education in jeopardy.

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Nepotism and favouritism in university appointments was recently under the spotlight in Italy, where it was revealed that there was rampant nepotism and favouritism in university appointments. Heads of Italian university departments, known as *'baroni'* or 'barons', were awarding qualifications based on exchanges of favours or private or professional interest rather than merit. A total of 59 people were under investigation, seven were placed under house arrest for corruption and 22 banned from holding academic posts for 12 months while the investigation continues.[34]

The rapid, inadequately regulated expansion of higher education created opportunities for new forms of corruption. Since the 1990s, university management reforms in African developing countries focused on the 'corporatization' of universities. The reforms were hinged on transforming public universities into entrepreneurial institutions as an income generating strategy, to address the decline of government funding to higher education due to, first, the imposition of Structural Adjustment Programmes (SAPs) and

second, the diversion of education funding away from higher to basic education. This meant that public universities begun to charge tuition or raise what were previously nominal fees, turning students into consumers and not just learners. Universities were obliged to hire more staff to teach the rising numbers of students, and since public funding to universities had decreased, such staff were hired on temporary contracts with pay linked to the number of hours taught. "Moonlighting" [35] has become common, with lecturers teaching in several universities to make ends meet. Thus, lecturer absenteeism is a problem in many developing countries. [36] Some lecturers connive with custodians and administrative staff to claim hours not taught and make up the shortfall in contact hours by selling self-published notes or requiring students to photocopy "handouts."

1.3.4 Finance and procurement fraud risks in higher education

Research grants are a major opportunity for corruption in developing countries. Money meant for research is misappropriated through various means such as travel and workshop fraud – false or duplicate payments for travel and workshop reports for events that did not happen; payroll fraud – false or fictitious employees on research programmes; stipend fraud – false recipients/vouchers and invoice fraud – fake or enhanced Consultant or Vendor invoices or receipts. In addition, some projects might, unbeknownst to the donors involved, achieve duplicate funding, and the additional funding used for personal business and activities.[37]

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University funds are vulnerable to fraud because of unique aspects of university management, which create incentives for fraudsters and make it difficult to detect fraud. These aspects include the decentralised functions and risk management processes, which implies that administrators are often unaware that a fraud could be taking place in the project or department for which they are responsible. Furthermore, the heavy academic workload, and the high amount of trust placed in university staff, can allow fraudsters to operate undetected for a while. Often, there are weak internal control systems and little external oversight. [38]

University management may misappropriate and embezzle funds, or collude with suppliers to rig the bidding process, resulting in sub-standards supplies or construction works. At Makerere University in Uganda, corruption was

suspected when a newly constructed perimeter wall collapsed during the subsequent raining season.[39]

A less reported type of fraud occurs when lecturers order desk copies of books from publishers under the guise of considering them for adoption as a textbook, then sell them online. Professors can make lots of money through schemes such as these. In a similar scheme, professors self-publish teaching content for their courses and then make students buy it. When professors and other faculty develop products using public or university-sponsored research funds, and then market or sell the products through their own private companies, this too amounts to the abuse of their power for their personal benefit. Misuse of university property for personal issues is another often ignored risk.

1.4 ACADEMIC FRAUD AND CHEATING

1.4.1 Plagiarism and Essay Mills

Plagiarism occurs when a person presents someone else's ideas, phrases, sentences or data as one's own work. Another person's work should always be properly and accurately referenced. Self-plagiarism involves submitting work that one has previously submitted. [40]

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The submission of term papers, theses and dissertations written by ghostwriters – so-called contract cheating or "essay mills" have been rising over the past decade. [41] The ghostwriting industry is thriving, and it is relatively easy to commission a writing assignment. In the UK, it was reported that more than twenty thousand students bought writing assignments from essay mills in 2016. [42] It is estimated that there are now more than 1,000 English-language essay mill sites on the web, raking in tens of millions of dollars every year. [43] The scale is so big that the number of such assignments submitted by students worldwide would be impossible to quantify. In countries where internet access to limited and students cannot easily buy essays on line, manual diploma mills in the form of "dissertation markets" or "proposal writing consultants," do the job. [44] Students can simply pay an individual to write their essays or dissertations for them. A survey of students in Saudi Arabia in 2014, found that more than 20 percent of students had paid somebody else for completing writing assignments. [45] In Wandegeya, a suburb

of Kampala near Makerere University, Uganda numerous shop windows advertise "proposal writing services" for a fee.

1.4.2 Falsification of research processes and results

Falsification of research data poses enormous challenges for humanity as a whole. "Climategate," the scandal where the Climate Research Unit at the University of East Anglia was found to have tampered with data on global warming, is one of the most egregious examples of this type of behaviour. The incident added fuel to the fire of climate change and other scientific theory deniers, casting a shadow over the credibility and integrity of academia as a whole.[46]

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The lack of transparency in research processes is especially pertinent in clinical trials, which have immediate, potentially fatal repercussions. It is estimated that billions of dollars is lost annually to clinical research whose findings are over-stated, possibly falsified and sometimes never published. Some of this research takes place in university contexts.[47]

A related problem is fake journals and fake peer reviews. Fake journlas have proliferated since the expansion of internet-based open access journals. Some have non-existent "ghost" editors and editorial boards, charge a fee for authors to publish academic articles with them, hold bogus conferences, and often publish articles of poor quality. [48] An international medical journal, Tumour Biology, retracted 107 Chinese-authored papers. The publisher of the journal, Springer, said the retractions were because the peer review process had been compromised by fabricated peer reviewer reports.[49]The Chinese government had set up an incentive system under which academics were awarded cash prizes for articles, and promotions and research grants were based on publication output. This was meant to boost China's standing in international science but had the unintended effect of motivating some to submit fake articles based on "cooked" data.[50]A similar problem in Pakistan led to the cancellation of several doctoral programmes.[51]Performance-based financing scheme such as these are susceptible to "gaming" and should therefore provide safeguards against it.

1.4.3 Examination Fraud

Examination fraud takes various forms, from leaking exams in advance, to cheating during examination by using unauthorized material, impersonation,

where examination candidates pay other people to sit exams on their behalf, as well as alteration of marks either directly on the answer sheet or in the examination records management system. The latter is usually instigated by a bribe from a student to a lecturer or member of the administrative team.

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Whereas cheating in exams has been a problem for a long time, technological advancements in the forms of mobile phones and tablets have broadened the means and methods for cheating. Students can request and receive answers to questions by text, wireless microphone and earphones, iPods and MP3 players.[52] A related form of cheating that has proliferated in the digital age is students' ability to illegally access test banks of multiple-choice questions or other instructor-only resources. Test banks are "instructor resource tools provided to the faculty by the vendor who sells the corresponding textbook."[53]

In 2017, 88 staff members at Makerere University Uganda were arrested for corruption in connection with the alteration of student grades and the issuance of fraudulent degrees. The alterations were made through the "backend" of the software programme that was used to manage examination records. 600 degrees awarded by the university had previously been revoked in 2014.[54] In 2016, the Kenyan government dissolved the country's national examinations board and ordered the arrest of its leaders after they were blamed for widespread cheating in university entrance tests. Senior managers at the Kenya National Examinations Council were implicated in cheating and 5,101 students had their results cancelled. Question papers were reportedly shared on the WhatsApp messaging service before exams, and texts of examination questions were on sale for about USD 7 each. [55]

1.4.4 Degree/ Diploma Mills

Some degree mills are mere printing shops that sell counterfeit degrees and transcripts from legitimate schools, while others are shadowy institutions that promise applicants degrees in a very short period of time, sometimes as little as five days or after a short period of "study."

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1.5 SEXTORTION AND SEXUAL HARASSMENT

The International Association of Women Judges defines sextortion as "the abuse of power to obtain a sexual benefit or advantage.... a form of corruption in which sex, rather than money, is the currency of the bribe. It is not limited to certain countries or sectors, but can be found wherever those entrusted with power lack integrity and try to sexually exploit those who are vulnerable and dependent on their power."[59]Sexual harassment of mostly female students and female lecturers by male lecturers and professors is considered a serious problem in higher education, but is not widely studied, especially in developing countries.[60]Despite few in-depth studies on the problem, media reports followed by public outcry against sexual harassment in universities are common.[61]

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Older studies from the US from the 1990s indicate that up to one third of female students faced sexual harassment each year. [62]A recent report from Australia states that around half of all university students (51%) were sexually harassed on at least one occasion in 2016, and 6.9% of students were sexually assaulted on at least one occasion in 2015 or 2016. A significant proportion (26%) of the sexual harassment experienced by students in 2015 and 2016 occurred in university settings. Men were the main perpetrators of both sexual assault and sexual harassment, and a significant proportion of students who were sexually assaulted or sexually harassed knew the perpetrator, who was most likely to be a fellow student from their university. Postgraduate students were almost twice as likely as undergraduate students to have been sexually harassed by a lecturer or tutor from their university.[63]

Sexual harassment is defined as:

Unwelcome sexual advances, requests for sexual favours or unwanted physical, verbal or non-verbal conduct of a sexual nature. Such conduct would constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or academic achievement or advancement; or
- Submission to or rejection of such conduct is used or threatened or insinuated to be used as the basis for decisions affecting the employment and/or the academic standing of an individual; or

• Such conduct has the purpose or effect of unreasonably interfering with an individual's work or academic performance or creating an intimidating, threatening, hostile or offensive working or learning environment."[64]

2. Reforms in higher education

Guidance summary: STEP 2 Reforms & reform approaches

Reform measures will always be specific to the particular circumstances. Nonetheless, in order to get ideas and insights, it helps greatly to learn about reforms employed elsewhere and to have a mental model of the type of possible reforms. We recommend you consider each of these ten reform approaches:

- 1. Functional approaches: *improvement of institutions, public financial management and systems*
- 2. People-centred approaches: building committed supporters, networks and coalitions
- 3. Monitoring approaches: *strengthen oversight groups and their independence*
- 4. Justice & rule of law approaches: *prosecuting, raising confidence, improving laws*
- 5. Transparency approaches: making visible what others wish to keep hidden
- 6. Integrity approaches: motivating and instilling pride
- 7. Whistleblowing approaches: finding safe ways for people to speak up
- 8. Civil society and media: external voices are essential
- 9. Incentives and economic theory approaches: *aligning stakeholders and economics*
- 10. Nudge approaches: *new science show how small changes can make a big difference*

Talking through with colleagues and stakeholders how each of them might work in your environment enables you to 'circle around' the problem, looking at different ways and combinations to tackle it. A reform strategy might, for example, consist of some institutional improvement projects, plus strengthening integrity among staff, plus strengthened sanctions and discipline.

You can read more guidance on Step 2 here.

There are various cross-national, national and institutional level initiatives to combat corruption in higher education. This section outlines a number of strategies that are underway as well as possibilities that have been suggested by UNESCO and other bodies. Combatting corruption in higher education is the responsibility of the various actors involved such as students, academics administrators, ministry of education officials, higher education regulatory agencies, professional regulatory bodies, civil society (especially professional and trade associations) as well as development partners.

While public and private universities have some peculiarities, corruption-related problems cut across the divide, especially in developing countries where public universities have privatized many courses and other aspects of management. The suggestions below therefore apply to both public and private universities.

Universities inhabit different political landscapes that shape the possibilities for tackling corruption. Political commitment is often the necessary foundation for enacting and implementing institutional reforms, and institutional change is determined by the distribution of power among various actors that shape and influence the institution. As intellectual elites, academics are part of the intra-elite power struggle and bargaining process that shapes a country's political settlement. [65] Thus, universities may become "captured" by the ruling regime or be granted autonomy to pursue their intellectual goals with little interference. A university's ability to enact and implement an anti-corruption strategy may therefore depend on how it is affected by political dynamics at national level and its degree of autonomy from the ruling elite.

For each of the categories of higher education corruption, suggested reform measures are summarised below.

Category	Suggested reform measures – higher education
Political corruption	 Enact university autonomy in governing legislation Participatory budgeting and budget monitoring Lobbying and Advocacy
Adminiustrative and bureaucratic corruption	· Improve transparency and accountability in accreditation bodies

	 Minimum and progressive requirements for accreditation to enable universities to grow University good governance and international quality assurance frameworks that ensure inclusion of students and other stakeholders in management and establish a code of conduct and specify standards across all areas with strict sanctions for wrongdoing
Academic fraud and cheating	 Anti-plagiarism software Secure examination printing process Increase number of invigilators and install CCTV for examination monitoring Anonymise exam answer scripts using bar codes Cyber-security measures to safeguard the "back end" of results database Document verification technology to detect forged certificates Blockchain technology to facilitate tamper-proof certification External examination procedures
Sextortion	 Gender parity policies Specific sexual harassment prevention and redress policies and procedures

2.1 IMPROVING UNIVERSITY GOVERNANCE TO ADDRESS POLITICAL AND BUREAUCRATIC CORRUPTION

Transparency and accountability at the very top are indispensable. Accreditation bodies should be above board by ensuring that accreditation processes are transparent and adhere to the law. Conflicts of interest involving members of accreditation bodies with ties to university promoters must be prevented and dealt with firmly if discovered.

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De facto, not just de jure autonomy is important for safeguarding universities from political interference. Higher education reforms in developing countries over the past two decades have often retained a role for heads of state in university affairs, which creates a loophole for state interference. [66] The concept of comprehensive university autonomy includes academic, financial and organisational autonomy. University autonomy means that the state renounces its right to intervene in the operational activities of higher education institutions, but maintains a relationship of trust, respect and openness with them. It also means that the state hands over responsibility for the quality of education and research, along with the necessary organisational and financial tools, to universities as self-governing institutions and that state, private and municipal higher education institutions have equal rights and responsibilities. [67]

University governance should be based on the good governance principles of participation, accountability and transparency. Thus, university autonomy necessitates that each university should have its own anti-corruption and integrity policy. Such a policy should be developed in a participatory manner and should set standards for ethics and integrity through a code of conduct and establish corresponding sanctions for students and staff who violate the standards. Consistent and uniform enforcement in accordance with due process principles must be adhered to. Whistleblower policies and procedures would be an essential part of a university anti-corruption policy.

Internal Quality Assurance (IQA) is important. As most IQA parameters focus on teaching, learning, employability and management, curbing corruption should be an explicit feature of IQA systems. IQA should be conducted in an inclusive manner, with leadership commitment and stakeholder participation. [68] The IQA should ensure transparency in staff recruitment, student admission, and financial management.

Even though autonomy is important, consistency and uniformity in policies at the national and international level is indispensable because higher education has become a global good. There are various ongoing attempts to harmonise higher education across regions, such as the European Union Bologna Process, which aims to promote compatibility and uniform quality assurance frameworks for higher education in Europe. [69] The Association of African Universities, working with the African Union and UNESCO, is also working to harmonise higher education standards under the Arusha Convention of 2007. This includes the development of an African Quality Rating

Mechanism.[70]Collaborative initiatives such as these present an opportunity for collective action against academic corruption that respects the autonomy of institutions whilst recognising the importance of uniform and consistent standards across regions.

2.2 INFORMATION AND COMMUNICATION TECHNOLOGY

Anti-plagiarism software such as Turnitin is used by universities and high schools across the world with the aim of detecting plagiarism. A study showed that higher education institutions using anti-plagiarism software realised a 44% decline in plagiarism and a 3000% increase in the number of papers graded online between 2010 and 2014. The research also found that higher education institutions in 12 of 15 countries using Turnitin reduced unoriginal content by more than 30%. Most content matches from highly plagiarised submissions came from matches to other students' papers rather than from websites, academic textbooks or journals.[71]

ICTs are also important in education and awareness raising on academic integrity. There are a number of eMOOCs (Massive Open Online Courses) for students, covering plagiarism and related matters. [72] It is also important to educate or refresh the knowledge of teaching staff on these crucial matters.

Data-driven decision-making is on the rise. It requires higher education institutions to have unified and robust information management systems that are secure from hackers and cyber-attacks. Blockchains have potential for tamper-proof examination records systems. The Massachusetts Institute of Technology developed an app called Blockcerts Wallet that issues virtual diplomas that students can receive via their smartphones. Students also receive the traditional paper certificate. The digital certificates are tamper-proof and easy to share with other schools, prospective employers or relatives. In a related development, the Sony Corporation and Sony Global Education have developed a platform that compiles and manages student records from several schools. School administrators, recruiting firms, and other interested parties can use it to verify the credibility of the credentials submitted to them. [73]

2.3 COALITION-BUILDING AND STUDENT INVOLVEMENT

The internationalization of higher education offers opportunities to spread norms that promote integrity and honesty in academia. Gow's research on Chinese Masters' Graduates of UK institutions returning to China showed that

the graduates had developed a stricter approach to plagiarism and academic integrity following their masters' courses in the UK and their subsequent educational career. He highlights the potential of such returning graduates to act as a cultural bridge for academic integrity within internationalized higher education.[74]

Coalitions and networks of universities can work together to promote integrity in academia. There are many such networks and associations, such as the Worldwide University Network, [75] Association of African Universities, Association of Universities of Asia and the Pacific, and the International Network for Higher Education in Africa. They function as Non-Governmental Organisations and work together to promote shared values and interests, including academic integrity. For example, the Global University Network for Innovation in Africa - GUNi-Africa has launched a series of workshops to raise public awareness of the problem of academic corruption and its implications, It is developing an Academic Integrity Index that would be tied to university rankings.[76] The Romanian Coalition for Clean Universities developed an audit and ranking system for universities in Romania that has succeeded in significantly reducing corruption in that country.[77]The Universities Against Corruption Initiative, under the Anti-Corruption and Integrity in the Arab Countries (ACIAC) of UNDP, is mobilising universities in the Middle East and Arab States to combat corruption in higher education. [78]

Read more

2.4 THE ROLE OF EXTERNAL QUALITY ASSURANCE AND OTHER EXTERNAL STAKEHOLDERS

External quality assurance by independent regulatory agencies is a crucial component of anti-corruption strategies for higher education.[82]In Romania, the introduction of an independent university ranking that includes academic integrity and financial irregularities as assessment criteria helped universities to become more transparent and compete by adopting better governance practices.[83] As recounted above, in Uganda and Kenya, regulatory agencies have been instrumental in denouncing fake degrees and insisting that universities that awarded them cancel them.

Read more

3. Developing an overall strategy

Guidance summary: STEP 3 Developing strategy

After you have reviewed the specific corruption types and identified possible reform measures, you can develop an overall strategy. Because curbing corruption is about changing the status quo, so you need to be thinking about how to build support, how to spread the benefits, how to bring opponents on board or how to outflank them. This is where judgement and political skill are important. You also need to think carefully as to which combination of measures and management is likely to result in the most impact within the limited resources and time available. We suggest that you develop an overall strategy – in collaboration with those who can also own it with you – in the following way:

- 1. Thinking through what impact you really want to achieve
- 2. Challenging yourselves by considering strategic opposites
- 3. Considering the people and the politics; where to build support
- 4. Setting up a sound implementation programme
- 5. Maximising supportive structures across government & stakeholders.

You can read more guidance on Step 3 here.

3.1 STRATEGIES FOR REDUCING CORRUPTION IN ADMISSIONS, EXAMINATIONS AND CERTIFICATION

3.1.1 Authentication and verification of qualifications

The proliferation of diploma and degree mills make it imperative to authenticate and verify academic credentials. This requires concerted efforts by higher education regulatory agencies across the globe. Verification and authentication may be done manually, or digitally (online). For example, Pakistan's Higher Education Commission[86] and China's Academic Degrees and Graduate Education Development Center[87] conduct qualification verification. Online verification is also becoming common. The West African

Examinations Council (WAEC)[88] is implementing a sophisticated digital method involving a unique pin code to check against a database. A scratch-card is sent with the student's application and can be scratched to reveal a serial number and one-use pin number to access or verify the student's official examination record online. Similarly, the Malaysian government recently launched an online database that enables the verification of doctoral degrees.[89]All in all, countries and universities should work together to establish centralised databases that employers and other institutions can use to check the validity of certificates and diplomas.

3.1.2 Vetting international recruitment agencies

The internationalisation of higher education has been greatly facilitated by international recruitment agencies, and yet these are not properly regulated either globally or nationally. Some institutions have developed guidelines for vetting international recruitment agencies.[90] The guidelines recommend careful vetting of agents to ensure that they have a proven track record in working with reputable institutions, are regarded as reliable by other universities, are appropriately licensed, maintain adequate staffing, and use ethical recruitment methods. They recommend that before setting up contracts with such agencies, it is advisable to inspect agency offices on-site, and include clearly defined quality and admissions standards in written agreements. Continuous oversight of agencies throughout the contract period is important.

3.1.3 Improving admission and assessment processes and safeguarding records

Admissions procedures can be improved by supplementing exam results with face-to-face interviews (whether in person or via Skype) to assess applicants and detect potential fraud. This could be difficult to implement in many universities where large numbers of students are admitted and there is inadequate staff capacity to conduct interviews. Some universities or departments within them run their own carefully controlled entrance exams.

The UNESCO and Council for Higher Education (CHEA) Advisory Statement for Effective International Practice on Combatting Corruption and Enhancing Integrity recommends the following:

- The use of external examiners to double-grade exams
- Anonymization of examination forms (barcodes instead of names)

- Cyber security measures to control access to student records
- Use of university rankings based on corruption criteria
- External audits of admissions decisions
- Sanctions on politicians, civil servants and others with fake degrees
- Legislative protection of whistle blowers.[91]
- Other suggestions to reduce fraud and cheating include:
- Changing assessment methods and supplementing student assessment with presentations and oral examinations, so that a particular grade is not based on a single high-stakes essay.[92]
- Alternatively, assessment that builds on the student's own experiences, classwork, prior drafts and feedback is more challenging to ghostwrite.
 It is also possible for universities to establish a system based on sequences of tasks that have a small mandatory supervised component.
- Requiring students to undertake all assessments in class (provided there are safeguards against impersonation) to curb ghost-writing.
- Randomised seating during exams and preparing several versions of the same exam in anticipation of leakages.
- Employing sufficient numbers of supervisors during exams.

Nonetheless, understanding the root causes of plagiarism is essential if we are to craft appropriate solutions. Education has become a very high stakes affair, and students face enormous pressures to succeed from their families.

Supporting students to do their best, rather than failure and recrimination when they do not perform as expected, requires a significant attitudinal and cultural shift amongst parents and across nations. Plagiarism detection is both a learning opportunity and a time to sanction unethical behaviour. An approach that focuses on the dishonesty and seeks to punish perpetrators based on a criminal law model does not necessarily help students to learn how to avoid plagiarism. The unprecedented rise in plagiarism facilitated by internet access therefore calls for a learning approach that emphasises fair and consistent approaches that consider students views. [94]

3.1.4 Enacting institution-specific academic integrity policies

Higher education institutions should each have a specific policy on academic dishonesty that defines what amounts to wrong-doing and the procedure to be followed where wrongdoing is suspected or proved. Policies should define what amounts to plagiarism and cheating and prescribe sanctions or punishments. A whistleblowing mechanism where anonymous reports of transgressions are made is also necessary. The International Centre for Academic Integrity discussed below prescribes a participatory policy making process.

A number of African Universities have signed the Dar es Salaam Declaration on Academic Freedom and Social Responsibility of Academics in Africa, and Declaration on Intellectual Freedom and Social Responsibility of Intellectuals in Africa. These documents emphasise the importance of academic integrity. Article 46 of the Dar es Salaam Declaration states that "All members of the academic community have a responsibility to fulfil their functions and academic roles with competence, integrity and to the best of their abilities. They should perform their academic functions in accordance with ethical and highest scientific standards."

3.1.5 Strengthening Ethics and Integrity Teaching at University Level

A number of studies have established that ethics training as part of university degree courses can improve student's integrity and sensitivity to ethical dilemmas. [95] 'The main idea behind [ethics teaching at tertiary level] is that universities must confront the question: which ethical dilemmas do we face in our educational setting, and which are we likely to face in future professional careers? The aim is not to teach university students that corruption is bad or morally harmful, which they already know, but to teach them to think critically about handling situations in which their professional ethics could be compromised.' [96]

3.2 COMBATTING SEXUAL HARASSMENT AND SEXTORTION

Many universities have specific sexual-harassment related policies. However, these are often not enforced due to a number of complicated factors. Makerere University in Uganda enacted a Policy and Regulations on Sexual Harassment Prevention in 2006, but only one case has been reported and proceeded through the framework created under the policy.[97]Sexual harassment has for a long time been on the agenda of feminists and women's rights activists, and there is a plethora of initiatives, laws, policies, and

suggested frameworks inspired by the United Nations Convention on the Elimination of all forms of Discrimination Against Women (CEDAW), 1979 and the Declaration on the Elimination of Violence Against Women 1994.

More recently, UN Women is piloting a new initiative to promote gender parity in universities under the HeForShe campaign. The initiative considers combatting sexual harassment a necessary part of improving gender parity at universities. HeForShe is a global effort to engage men and boys in removing the social and cultural barriers that prevent women and girls from achieving their potential, and thus attempt to reshape society. Under the HeForShe IMPACT 10x10x10 pilot, UN Women is partnering with 10 universities[98] to mobilize university campuses to reshape the global discourse on gender equality. HeForShe IMPACT 10x10x10 engages with universities at the administration and student level on gender sensitization and gender-based violence. The engaging universities undertook three baseline commitments: first, to implement gender sensitisation education for students, faculty and staff; second, develop programmes to address SGBV on campus; and third, to ensure that top university leadership was at the forefront of promoting the IMPACT 10x10x10. Universities further undertook to achieve gender parity in academia and administration.

Under the IMPACT 10x10x10, universities are implementing a number of measures to address sexual harassment. These include:

- Compulsory workshops on sexual consent to be offered to all new students as part of orientation programmes and some specifically targeted towards male students such as the "Good Lad" campaign at Oxford University.
- Development of a first response mobile phone app under the banner "Code4Rights." (Oxford University).
- Setting Up stand-alone gender equity offices to encourage reporting of gender harm (University of Witwatersrand).
- Training both students and staff on recognising and reporting sexual and gender-based violence (Georgetown University).
- Stony Brook University Centre for Study of Men and Masculinities will promote global understanding on the role of men in achieving gender equality through research, teaching and convening conferences.[99]

The HeForShe initiative therefore considers sexual harassment in universities not as a stand-alone problem, but one that is linked to the lack of gender equality and parity in higher education. Programmes to promote gender parity

are therefore implemented in tandem with specific programmes to address gender-based violence.

Similarly, academic corruption is often a symptom of wider problems in society and in national politics, reflected at university level. Nonetheless, universities, as spring boards for professional training and skills acquisition, are well placed to counteract the vicious cycle of corruption by educating students against corruption and dealing firmly and consistently with those who break the rules.

3.3 AGENTS OF CHANGE

There are different stakeholder groups who can positively influence the integrity agenda.

National higher education regulatory bodies have an important role to play in ensuring that universities within their jurisdictions embark on strengthening academic integrity as part of accreditation processes and external quality assurance. Where such bodies are themselves "captured" and susceptible to corruption, civil society, including professional associations, should advocate for change and put pressure on them to fulfil their roles.

Development agencies can play a role by supporting the expansion of global and regional university networks. Many such networks operate as NGOs and should be supported to publicise the issue of academic integrity and educate students, faculty and the public at large on the importance of academic integrity to the whole of society. Some bi-lateral agencies have existing relationships with educational cooperation institutions such as the British Council and the German Academic Exchange Service (DAAD). Such institutions can play a substantial role in enhancing academic integrity in their partnerships, not only through returning students acting as "bridges," but also in more pro-active ways. For instance, donors should consider funding antiplagiarism software licences, funding further in-depth research on academic integrity in developing countries, and supporting education and awareness raising for all actors in higher education. The EU is funding a Pan-African Programme on quality assurance and accreditation in Africa, involving the implementation of the Pan-African Quality Assurance Framework mentioned above. Other agencies may consider supporting aspects such as enhancing the financial management skills of researchers and faculty who manage research grants.[100]

In addition, **private higher education** is a field that is ripe for investment, due to the huge unmet demand in developing countries. Private investors from developed countries should partner with developing countries to establish more universities that measure up to international quality assurance standards. Universities promoted by Multi-national Corporations can be moral entrepreneurs that contribute to norm change in the countries where they operate. [101] This would improve competition and standards in higher education, in addition to playing a role in producing the human capital needed to enable low-income countries to achieve their development goals.

Transnational and regional networks of universities should work together to coordinate and build upon the ongoing efforts to curb corruption in higher education at institutional, national and transnational level.

4. Transnational initiatives in higher education

Guidance summary: STEP 4 Transnational initiatives

Review what international sector efforts are active in tackling corruption in your sector. They may be sources of knowledge, ideas, support and perhaps assistance in the development of your initiative. Sector-specific organisations include:

- Professional sector associations (many have an 'anti-corruption working group' or similar forum);
- Initiatives and programmes targeted on building integrity, raising transparency and reducing corruption in the sector;
- Multilateral organisations associated with the sector (eg World Health Organisation). They too may have anti-corruption knowledge and capability.

Non-sector-specific organisations also have sector knowledge. These include:

- Multilateral economic organisations such as World Economic Forum,
 IMF and OECD; among these,
- OECD has a large group focused on public integrity and anticorruption.

- There are multiple stand-alone initiatives focused on issues such as beneficial ownership transparency, or access to information.
- Multilateral development organisations, like the World Bank, UNDP and U4, can hold valuable sector knowledge and expertise, whether or not you are based in a developing country.

There are three main international centres and resources for tackling corruption and strengthening integrity in higher education that may help, plus several others that we know of:

International Centre for Academic Integrity (ICAI)

The International Centre for Academic Integrity (ICAI) is a membership organization of universities from various countries, mostly in the USA, but also in Europe, the Middle East and Asia. It was founded to combat cheating, plagiarism, and academic dishonesty in higher education. It also aims to encourage the cultivation of cultures of integrity in academic communities throughout the world. It offers assessment services, resources, and consultations to its member institutions, and facilitates conversations on academic integrity topics each year at its annual conference. [102]

Read more

ICAI has developed a comprehensive approach to enhancing integrity that involves a participatory risk assessment followed by a participatory reform process. ICAI has developed an Academic Integrity Assessment Guide. [103] The guide facilitates institutions to evaluate the effectiveness of their academic integrity programs and policies; assess student and faculty attitudes and behaviour in classrooms, labs, and exams; identify potential concerns from sanctions to educational programs; develop action plans to improve understanding on the importance of academic honesty and promote open dialogue about academic integrity issues on campus.

The guide also provides a number of academic integrity templates for violation and resolution reports; classroom handouts that explain unauthorised collaboration and how to avoid plagiarism; [104], [105] guidelines for establishing an effective academic integrity assessment committee; and step-by-step instructions for generating revised policies, practices, programmes and sanctions. It also includes suggested assessment and educational activities for focus groups; examples of codes of conduct, as well as plagiarism and academic integrity online tutorials.

ICAI had developed a Model Code for Academic Integrity, which is freely available online. [106] The code applies to students as well as staff and is premised on the fact that academic integrity is a shared responsibility, and that a model based on punishment alone will not work. It emphasizes that "the most effective deterrent will be a commitment to academic integrity within the student peer group." [107]

ICAI is encouraging universities to designate and celebrate Academic Integrity Days and Weeks for awareness raising. It also has an Academic Integrity Rating System[108] whose role is to identify benchmarks for institutionalizing academic integrity in schools, colleges and universities and reward campuses for their efforts to curb cheating and empower academic integrity. It also allows colleges and universities to compare themselves to similar institutions. The rating system collects data on academic integrity that interested stakeholders can use to check the efforts of different institutions on academic integrity. Lastly, the data that is being collected will enable future research that can lead to a continuous improvement of efforts in this area.

International Institute for Education Planning, UNESCO

IIEP-UNESCO, based in Paris, has been an expertise centre on tackling corruption and strengthening integrity in the education system for many years. They provide support to countries that are in the process of launching <u>public</u> <u>expenditure tracking surveys (PETS)</u>, <u>report cards</u>, and audits, or who are conducting an <u>integrity assessment of their education sector</u>. It also carries out research projects and activities to document successful strategies to promote transparency and accountability in a variety of educational planning/management domains. The IIEP Ethics and Corruption in Education Programme develops an understanding of how to reshape educational planning by considering transparency and accountability concerns.

They produce guidance in integrity in higher education (See here and here, for example). They are active in respect of both school education and higher education. For example, in April 2018 they organised for education and university officials from Montenegro to learn from Geneva's experience in promoting integrity in higher education. They have a comprehensive webbased resource platform, ETICO, with various resources on the issue of ethics and corruption in education, including higher education. [109]

Magna Charta Observatory

The Magna Charta Observatory of Fundamental Values and Rights (MCO) regards itself as the global guardian of fundamental university values and assists universities and higher education systems to operate effectively in accordance with them. It does this for the benefit of students, staff, society and universities themselves.[112]The Observatory is a signatories' association, independent from political organisations or interest groups. The signatory universities – through their rectors, presidents and vice-chancellors, who act on behalf of their institutions – are connected to the organization by their commitment, present and future, to comply with the principles of the Magna Charta Universitatum. The Observatory undertakes its work to ensure the integrity of intellectual and scientific work in Institutions and society, thus reinforcing trust in relationship between universities and their communities, be they local, regional, national or global.[113]Their work covers multiple countries, with a focus on the management of integrity (see for example Badrawi et al (2008) in "The management of university integrity".

Other organisations

Center for International Higher Education of Boston College. The centre has established an online Higher Education Corruption Monitor—which provides updated resources (news, articles, videos, etc.) on corruption in higher education around the world, serving as a forum for awareness-creation and information exchange.[110]

European Charter for Researchers. This is an example of a comprehensive attempt to regulate the behaviour of researchers. It is a set of general principles and requirements which specifies the roles, responsibilities and entitlements of researchers as well as of employers and/or funders of researchers. It builds a framework for researchers, employers and funders inviting them to act responsibly and professionally in their work. In regard to corruption, it exhorts researchers to "be aware that they are accountable towards their employers, funders or other related public or private bodies as well as, on more ethical grounds, towards society as a whole. In particular, researchers funded by public funds are also accountable for the efficient use of taxpayers' money. Consequently, they should adhere to the principles of sound, transparent and efficient financial management and cooperate with any authorised audits of their research, whether undertaken by their employers/funders or by ethics committees." [111]

Prospects HEDD and the UK Department of Education. Prospects is a UK provider of information, advice and opportunities to students and graduates.

Prospects is the commercial trading subsidiary of the Higher Education Careers Services Unit (HECSU), a higher education agency and registered charity. They produce a useful guidance book on how universities can recognise and tackle degree fraud (See here).

Thomas Lancaster's Blog. Self-described as "blog posts from Academic Integrity Expert and Higher Education professional," the blog has a series of articles on contract cheating (essay mills) and other topical academic integrity issues.[114]

US Council for Higher Accreditation (CHEA). This has a special section on degree and accreditation mills on its website and, in 2009, issued a statement with UNESCO on how to discourage degree mills in higher education. [115]

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