Abstract
This paper starts by contextualizing the current trend of increasing academic fraud and corrupt practices in quality assurance and accreditation processes. Several factors are considered, such as the diversification of higher education services and delivery systems, increased competition among students and institutions, globalization and the cross-border education phenomenon. The next section focuses on the opportunities for fraud and corruption that have been observed in two different contexts: first, in countries in which mechanisms for examination and accreditation are under the authority of central public bodies; and second, in countries where these mechanisms are regulated and controlled by non-governmental bodies. Special attention is given here to international delivery services, including institutions with large numbers of overseas students, extramural education institutions and e-higher education. The next section considers six key strategies that can be adopted to address these challenges, namely: regulating the market by means of transparent criteria, reducing the risks of conflict of interest, using more appropriate management tools, developing standards and codes of practice, facilitating public access to information and establishing and using awareness indicators, commonly referred to as red flags. After presenting the rationale behind each strategy, the paper then provides examples of good practices. The paper concludes with policy recommendations for the national, regional and international levels.

INTRODUCTION
Three major trends affect the demand for higher education today: the global growth of student enrolment figures, the redistribution of student enrolment among regions and the increased traffic of students from country to country. These trends, which will be discussed in this paper, arguably pose major challenges for transparency and accountability in higher education management.

THE MASSIFICATION OF EDUCATION
In 1970, the number of students in higher education was 28.2 million. By 1990, it had grown to 70.8 million and by 2004 to 132 million. These are minimum figures, as they only account for countries with available data. The many reasons for this expansion in higher education include: the increasing complexity of the demand of modern societies and economies for more highly trained personnel; the fact that, in many fields, training that would have once been provided ‘on the job’ has become formalized in institutions of higher education, including corporate universities; the emergence of new fields that rely on universities as key sources of training, such as biology and computer science; the restructuring of higher education systems in Central and Eastern Europe and Central Asia after the fall of communism, which has led to the emergence of new public and private institutions and an increased number of students being admitted to higher education institutions. These trends, in generating further competition among students – not only to be admitted to universities, but also to enter the best institutions and get the most highly valued degrees or diplomas – have paradoxically encouraged a rat race in higher education.

THE CHANGING GEOPOLITICAL ENVIRONMENT
The demand for higher education has evolved greatly in recent years. The following are the dominant countries in terms of size and growth of enrolment figures: China, which had 19.4 million students in 2004; the United States, which had about 17 million students in 2004; India, which had 11.3 million students in 2004; Russia, which had 8.6 million students in 2004; Brazil, Indonesia, Japan, which had between 3 and 4 million students each in 2004; and, finally, Argentina, Egypt, France, Italy, South Korea, Mexico, the Philippines, Poland, Thailand, Turkey, the United Kingdom and Ukraine, which had between 2 and 3 million students each in 2004. With the collapse of the Soviet Union and the regional unification of Europe, new models are gaining popular support, such as combining courses at different universities.
and campuses in different countries, which at times blurs the overall picture.

Finally, while nations control what happens within their borders via various regulations and requirements, the vast enrolment figures for transnational education, which had about 2.5 million students in 2004, has naturally led to an increasing demand for quality assurance, mutual accreditation of institutions and awards, and mutual recognition of qualifications.

THE CROSS-BORDER PHENOMENON OF OVERSEAS STUDENTS AND COURSES

Economic globalization has contributed to the international mobility of labour and students (see Box I.7.1 for some figures that illustrate this phenomenon). This has generated a huge market in the international trade in higher education, which now moves billions of dollars and is a major source of income for a few provider countries. However, the cross-border phenomenon is also characterized by the development of overseas courses with at times extremely complex and even opaque administration. Pebble Hills University offers a striking example of this: not only does it claim to offer degrees in a variety of fields, it also claims to be incorporated in Hutt River Province Principality in Western Australia and to have a license to grant degrees from the Principality of Seborga in Italy. Moreover, the degrees offered are taught in learning centres in what are referred to as knowledge villages in Dubai, Hong Kong, Singapore, Taiwan, Lebanon and Nigeria (Brown, 2005).

The explosion of new information and communication technologies has rendered the current situation even more complex, with the multiplication of both virtual institutions and distance education programmes. The financing and quality assurance mechanisms of these educational providers are rather different from those of conventional higher education establishments.

These major trends are certainly promising, as they reveal that more students have access to universities, new regions are emerging and new opportunities for studying abroad are rapidly developing. At the same time, they contribute to increasing competition among students and institutions, to changes in roles and functions of universities, to the emergence of new providers, and so on. All of these factors could generate new incentives for academic fraud and corrupt behaviour.

THE INCREASED COMPETITION AMONG STUDENTS AND INSTITUTIONS

The increased competition among students (for admission to the best or second-best institutions and programmes) and between institutions (traditional, transnational, distance, single, networks of institutions and programmes, and so on) is today a worldwide phenomenon. Unless well regulated and controlled, this pressure increases the risk of academic fraud and cheating by students (for example to gain entrance to educational institutions or pass exams) and by higher education institutions (relaxing academic admission conditions, selling fake programmes or delivering fake certificates, and so on). In Georgia, for example, some private tutors take bribes to help guarantee that students are admitted to the department of their choice. These private tutors are generally on examination committees and therefore have connections within universities, are familiar with the content of exam papers, and can manipulate admission procedures to improve the chances of an applicant gaining entry to a particular university (Janashia, 2004). Competition in the area of research is also having detrimental effects. For example, higher education institutions, as producers of research, are now even more susceptible to plagiarism. As they are also consumers of research (given that undergraduate degrees, master’s degrees, PhDs and additional funding, particularly from private companies such as pharmaceutical industries, are all obtained through the submission of research work), they are also more vulnerable to the manipulation of research results.

Box I.7.1 The cross-border phenomenon: some figures

According to UNESCO, there were over a million students studying abroad in 1995. Some data suggests that by 2002 the number of foreign students had grown to about 2.04 million in industrialized countries and to 1.80 million in the least-developed countries (LDCs), with the leading providers being Australia, France, Germany, Japan, Russia, the United Kingdom and the United States (UNESCO Yearbook). According to the OECD, international student mobility to OECD countries has doubled in the past 20 years. Most international trade in higher education services takes place within the OECD area, which has received 85 per cent of foreign students over this period. Foreign students are now an important source of export revenue in several countries, as they spend large amounts of money on travel, education and living expenses. Export revenue in education services, for example, amounted to an estimated minimum of US$30 billion in 1999. Moreover, according to estimates, US exports generated about US$8 billion (a rather conservative estimate) in the late 1990s. The fifth-largest export service sector was higher education, which provided 4 million jobs. An estimate by the Global Alliance for Transnational Education indicates that the United States, the United Kingdom and Australia together exported about US$27 billion worth of higher education to Asia and the Pacific over the same period.
THE MORE DOMINANT GATE-KEEPING FUNCTION OF UNIVERSITIES
A university degree is gradually becoming a prerequisite for an increasing number of occupations. Certification is now indispensable for most positions of power, authority and prestige in modern societies. This puts immense responsibility in the hands of higher education institutions and, at the same time, opens enormous opportunities for corrupt practices. Testing for admission to higher education has become a key role of higher education institutions, which they share with the ministry of education in some cases. Tests are the main tools used in the admissions process and are the major determinants of future success in education, employment, income and social status. Because of competition between institutions and for access to specific professions, the pressure of the demand for access to the ‘right institution’ and the ‘right courses’ generates and sustains corrupt behaviours. Furthermore, universities are playing a greater role as examining bodies. This is due to various reasons, in particular the expansion in education and the consequent need to provide ever more competitive sorting mechanisms to control access to high-prestige occupations. Universities are seen de facto as meritocratic institutions that can be trusted to provide fair and impartial testing. However, when their testing mechanisms break down (for example in China) or are subject to corrupt practices (for example in India), their image is significantly weakened.

THE EMERGENCE OF NEW HIGHER EDUCATION PROVIDERS
The emergence of new providers of higher education has contributed to the diversification of the higher education market, with the creation of technical institutes, community colleges, liberal arts colleges, mega-universities, on and off campuses, and so on. Many countries have therefore experienced a boost in private secondary education initiatives (for example in the Philippines, the majority of students attend private colleges and universities); an exodus of students abroad (a rough estimate suggests that more than 150,000 Indian students are enrolled in education abroad); a diversification of production and delivery technologies; and the development of a significant market for the providers of e-training and other distance and open institutions (as early as 1992, the Open University in the United Kingdom had more than 120,000 students). For the higher education market to operate effectively and fairly within this context, there is a strong need for certified information about what is being offered by each institution and the actual value in terms of learning achievements, skill development and qualification. However, there is a twofold obstacle to achieving this: not all stakeholders agree to respect the need for accreditation, and even accredited entities and programmes do not always provide services of similar quality.

THE DIVERSIFICATION OF HIGHER EDUCATION MARKETS
Advances in information and communication technologies have assisted in the development of new ways of delivering higher education and demonstrated the possibility of enhancing the quality and quantity of learning. For well-established and large-scale distance teaching universities, the shift to using new technologies necessitates a major overhaul of activities and huge investments in entirely new infrastructure for the development and delivery of new courses. The major decisions required to initiate these changes cannot be taken easily or quickly. However, it is evident that if distance education universities do not positively face the challenges of merging and continuously evolving technologies, they may lose students and government support. International joint ventures, financed by global networks, could help speed up the adoption of new e-learning technologies on an even wider scale. The question, however, is: in this scenario, who will be regarded as accountable, to whom and how? Due to the mushrooming of new degree programmes and private institutions, sometimes with a high likelihood of the delivery of fake services and certification, there is also a growing need for the recognition of certificates, diplomas, courses, training programmes and institutions. This need is being translated into more demand for quality assurance and accreditation from institutions and delivery mechanisms.

THE DEMAND FOR PROFESSIONAL GOVERNANCE OF HIGHER EDUCATION
Despite imponderables, it is likely that demand for access to education by an ever-widening segment of the population will continue overall. However, limited funds and the desire for efficient allocation of resources will come into direct conflict with demands for access, which will put greater pressure on higher education. As institutions become larger and more complex, there will also be increasing pressure for a greater level of professional administration. At the same time, traditional forms of governance will come under increasing pressure to reform, as they will become inefficient in institutions that are growing larger and more bureaucratic. Moreover, the overall administration of higher education will be professionalized. The demands for accountability will also increase, causing institutions considerable difficulty. And as academic budgets increase, there will be an inevitable demand to monitor and control expenditures and a call for more transparency and accountability in resource management.
ACADEMIC FRAUD AND QUALITY ASSURANCE: KEY ISSUES

Corruption occurs at all levels in universities. The Georgian case study exemplifies this. There, widespread misconduct affects university examinations, the conferring of academic credentials, the procurement of goods and services, and the licensing and accreditation of institutions. It is also now accepted that academic fraud and corrupt practices involve a variety of stakeholders, including examination candidates, teachers, faculty members, supervisors, officials and employees of examination authorities, in addition to managers of courses, programmes, institutions, universities, and so on. Entities in charge of quality assurance and accreditation are also susceptible to corrupt practices, which is even more worrisome. Within this context, and given the complexity and diversity of the trends described above, it is extremely difficult to produce a comprehensive list of all opportunities for academic fraud. This would be a useful exercise, however, as it would help to analyse the causes of corruption in higher education and to design strategies to address it. This paper thus focuses on a broad cluster of opportunities for corrupt practice. In doing so, it maintains a distinction between the existing forms of higher education and the new forms emerging both within and outside of traditional public and private higher education sectors, despite there being blurred boundaries between the two.

ACADEMIC FRAUD AND CORRUPTION IN TRADITIONAL FORMS OF HIGHER EDUCATION

Academic fraud and corruption in traditional forms of higher education take various forms, namely agreements between students and faculty members or administrators, such as students paying professors for good grades or administrators charging students’ families for admission to their university. However, examinations are the key area for a variety of malpractices. These can take place before, during or after exams. Some examples of these malpractices follow.

BEFORE THE EXAMINATION

- University professors offering university applicants expensive tutorial sessions that serve as a condition for entry or success.
- Officials, paper-setters, moderators or school administrators leaking the content of exam papers prior to the exam because of nepotism, favouritism or bribery.
- Preparing the actual topics of an examination beforehand (for example in Pakistan, some paper-setters were found to be operating their own tuition centres for exam candidates, who, upon payment of substantial fees, were granted access to at least part of their exam papers).

DURING THE EXAMINATION

- Impersonation (that is, unregistered candidates taking the examinations of registered candidates, sometimes with the full knowledge of the supervisor).
- Candidates smuggling in cheating material (for example written notes or textbooks hidden in garments).
- External assistance (from helpers, for example, with the use of cell phones).
- Plagiarism in answering examination questions or in writing term papers.
- Copying and collusion among candidates.
- Irregularities during the examination process (for example the amount of time allotted to a candidate being altered for no justifiable reason).
- Intimidation of supervisory staff (for example by

Box I.7.2 A reminder of a few definitions

<table>
<thead>
<tr>
<th>Academic fraud</th>
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<td>- Academic fraud is defined as the use of public office for private gain in the academic field, especially regarding accreditation of courses and institutions, examinations for access and for transfers between institutions, certificates and diplomas, university/college research and publications.</td>
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<tr>
<td>- It represents any prescribed action taken in connection with an examination or test or with accreditation that attempts to gain unfair advantage or, in some cases, to place a candidate – student or institutions – at a disadvantage.</td>
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<tr>
<td>- It also refers to the extent to which procedures to standardize the conditions under which examinations are prepared, administered and scored are observed or violated.</td>
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Academic fraud is evidently just one example of corrupt practice in higher education. It always has consequences for higher education in terms of corruption. For example, academic plagiarism is a form of academic fraud, but it also represents non-compliance with copyright law. However, not all corrupt practices resulting from corrupt academic management can be regarded as academic fraud.

Autonomy and accountability

Autonomy is inconceivable without accountability – and not only in managerial and administrative terms. There is a duty to provide services within the framework of a balance between autonomy and accountability and an agreement between universities and the world of work. The concept of autonomy is often used to support the claim that any form of accountability negates the principle that universities must manage their own affairs without external interference. In pluralistic societies, most controls take the form of accreditation and institutional authorizations, as well as general official recognition, particularly of academic degrees and diplomas.
candidates, external helpers, parents, politicians, and so on).
- Improper assignment of candidates by officials to targeted centres.
- The use of ghost centres (that is, fictitious exam centres established by corrupt examination officials, where candidates can complete exams with the support of helpers and/or without supervision).
- The purchase of finished term papers, particularly on the Internet (for example via so-called "paper mills").
- Substitution of scripts (that is, scripts written during an examination being replaced with scripts written either before or after the examination).

AFTER THE EXAMINATION (ADMISSION TO UNIVERSITIES)
- Grading malpractices (that is, collusion between the candidate and the grader, intimidation of graders by parents, or intimidation of parents by graders seeking rewards from candidates’ parents).
- Bribery of the academic authorities responsible for admissions and/or for officially awarding scholarships to candidates on the basis of academic qualifications or exam results.
- Falsification of data files and result sheets, often by corrupt officials (for example admission test scores or the ranking of students in the admission list being illegally changed).
- Illegally changing fee-paying and non-fee-paying quotas.
- Sale of seats to students whose test scores do not qualify them for a position (at times through a bidding process, if the number of seats is limited).
- Issuing fake credentials and diplomas (for example via diploma mills).
- Manipulation of curricula vitae in order to obtain a job or pay increase (for example using fake diplomas, non-existent publications, and so on).
- Selling academic posts (for gifts, bribes, free work or other emoluments) or granting them based on ethnic or religious backgrounds.

Many malpractices are also found in the area of research, academic journals and publications, such as plagiarism, fabrication or falsification of data, distortions or manipulations of research results, manipulation of statistics, biases and conflicts of interest among reviewers, and so on. Some university lecturers and researchers, for example, give consultations to private firms without any form of control by their university hierarchy. At times, this practice has a strong impact on the rate of attendance, influences teaching content and introduces bias in research conclusions.

CORRUPTION IN NEW FORMS OF HIGHER EDUCATION
In recent years, extensive developments in ICTs have immensely widened the scope for fraud in academia and, at the same time, introduced innovative new methods of malpractice. The Internet (and all forms of e-learning) is now arguably the leading vehicle for fraudulent practices. Among other things, it has facilitated the practices of selling essays and term papers (rendering plagiarism a major problem), as well as fake degrees, at times even from reputable colleges and institutions such as Harvard and Yale or others in London and Paris. According to the Swedish National Agency for Higher Education, Sweden is now affected by academic fraud to a greater extent than ever before. The country’s problems include: bogus PhDs supposedly from Swedish higher education institutions, students applying for courses based on fake qualifications and individuals applying for posts using fake degrees. In addition, there are many fake universities, some of which advertise in the international press, circulate information by sending spam and rank high on the hit lists of search engines. These universities also sell qualifications from Swedish higher education institutions, claiming that they are members of the institutions (see the website of Swedish International Development Agency (Sida) at: http://www.sida.se).

Indeed, websites specializing in fraudulent services are numerous today. Two examples are www.fakedegrees.com and www.cheathouse.com. Box I.7.3 provides another striking example of the impact that progress in new communication technologies has had on fraud in higher education.

The transnational education boom has also contributed

Box I.7.3 Degree mills

Degree mills have been around for hundreds of years, and they are still flourishing all over the world. During the 1980s, the number of phony schools significantly diminished because of the FBI’s DipScam diploma-mill task force. The work of this body helped to secure indictments and, in most cases, brought about the convictions of many individuals. This trend has unfortunately been reversed and the problem is now actually getting worse. Both in the United States and in Europe, diploma mills have made a real comeback due to the decline of DipScam, which began in the early 1990s, as well as the advent of inexpensive laser printers, colour copiers, overnight delivery services, 800, 888 and 500 telephone numbers, faxes, computer bulletin boards and other accessible technology, especially the Internet.

to the emergence of new opportunities for fraud. The following are some illustrations of this involving the management of overseas students and the franchising of overseas courses.

**MANAGEMENT OF OVERSEAS STUDENTS**
- Overseas students being offered financial incentives to enrol.
- Applicants being given false hope or promised admission on the spot.
- Applicants not eligible for admissions unduly charged a variety of fees.
- Applicants using fake credentials to gain admission.
- Applicants being charged by education agents for the falsification of documents that will qualify them for university entry.
- Indiscriminate recruitment of foreign students as a means of chasing money (that is, the acceptance of fake diplomas, lack of language skills, and so on).
- Bogus institutions that do not deliver the services they advertise. These are often unsustainable institutions that close down after the receipt of money.
- Bogus institutions promising visas to overseas students who enrol in their courses.
- Institutions and courses without proper accreditation being included on the official lists prepared for international students.
- Lowering of academic standards for overseas students (that is, with regard to admission, performance, graduation, and so on).
- Overseas students being allowed to repeat courses several times, even when they have no prospect of passing.

**FRANCHISING OF OVERSEAS COURSES**
- Corrupt officers making money by issuing licences and franchise rights and collecting fees/bribes from those wanting franchises.
- Students enrolling at franchised institutions assuming that since they are paying fees they will automatically qualify.
- Reducing the number of failing students by inflating the grades of those at risk of failing and turning a blind eye to plagiarism.
- Students, parents, the franchisee or the franchising institution pressuring faculty members to adjust grading standards so that everyone passes examinations and assessments (for example, in institutions in China, Malaysia and Vietnam).

**CORRUPTION IN QUALITY ASSURANCE AND ACCREDITATION MECHANISMS**
Accreditation and certification processes worldwide are increasingly being undermined by fraud. According to Bear and Bear (2004):

There are more than 300 unaccredited universities now operating. While a few are genuine start-ups or online ventures, the great majority range from simply being of dreadful quality to being outright diploma mills, which are fake institutions that sell degrees for between US$3,000 and US$5,000. It is not uncommon for a large bogus school to ‘award’ as many as 500 PhD’s each year and, as a consequence, earn an aggregate income easily in excess of US$200 million. Data shows that a single phony school can earn between US$10 million and US$20 million annually.

More specific forms of malpractice in quality assurance and accreditation include:
- Payment of bribes to obtain successful certification or accreditation.
- Distortion in the application of accreditation criteria, for example admitting below-standard candidates to meet enrolment criteria (ex ante) or over-grading students to meet achievement criteria (ex post).
- Accreditation processes based on non-transparent criteria (because rectors have an interest in preventing competition).
- Higher education providers circumventing accreditation procedures through franchising schemes or introducing courses in segments of the education system where accreditation is not compulsory.
- Establishing schools for the sole purpose of making a profit by lying about their accreditation status, thus preventing their students from taking national licensing exams.
- Non-accredited institutions falsely issuing accredited degrees.
- Creation of fraudulent or bogus accreditation agencies (accreditation mills, which are at times established by higher education institutions themselves).

**DIFFERENCES BASED ON CONTEXT**
Because opportunities for corruption may depend on the model in place, certain distinctions may arise based on the context. Indeed, a brief glance at higher education throughout the world reveals a continuum of academic systems: from highly centralized models (for example France and China) to almost completely decentralized ones (for example Australia, Canada and India); from federal systems (for example Germany and the United States) to systems where the private sector is in competition with the public sector (for example Latin America and Japan); from systems which, until quite recently, were fragmented,
with numerous and over-specialized establishments (as in the former communist European countries), to systems that are virtually carbon copies of others (as in some countries in Africa and the Arab region). Similarly, systems of quality assurance and accreditation vary from country to country. A distinction should therefore be made between the following two models: quality assurance and accreditation regulated and controlled by central public bodies (for example ministries of education, University Grants Commissions, and so on) and quality assurance and accreditation regulated and controlled by non-governmental bodies (for example independent commissions, private entities, professional associations, and so on).

QUALITY ASSURANCE AND ACCREDITATION REGULATED AND CONTROLLED BY CENTRAL PUBLIC BODIES

This is the prevailing model in many societies, typically those with a strong tradition of centralized education administration, as in France and some former Soviet countries. In this case, quality assurance mechanisms are often confined to the educational activities of institutions within national boundaries and are not always consistent nationwide. Moreover, the monopoly power exerted by public bodies and the regular occurrence of collusion of interests open doors for a variety of corrupt practices, such as the payment of bribes for university admission or to successfully obtain accreditation, accreditation processes based on non-transparent criteria, distortion in the application of accreditation criteria, and so on. A study undertaken in Ukraine, where there are some 175 accredited private higher education institutions, shows that the main areas of corruption in the education sector include large state universities that control licensing and accreditation. Interviews conducted with 43 rectors, vice rectors and administrators from five private universities revealed that successful licensing or accreditation applications, with few exceptions, required some form of bribery; that licensing, mandatory only for private institutions, may require a bribe of US$200 (about two months’ salary for a typical academic); and that accreditation might call for a ‘gratuity’ of 10 or 20 times that amount (Stetar et al., 2005).

QUALITY ASSURANCE AND ACCREDITATION REGULATED AND CONTROLLED BY NON-GOVERNMENTAL BODIES

With the higher education market now becoming liberalized, this is the model currently in vogue. In principle, this model offers low risks of collusion and conflict of interest between the bodies in charge of accreditation and the beneficiaries of its service. But de-linking the bodies in charge of quality assurance and accreditation from higher education institutions does not address the other manifold causes of corruption and academic fraud, such as: illegitimate regulatory bodies; the partial or inconsistent scope of quality assurance and accreditation, leaving room for managers to misuse procedures; non-compliance of higher education institutions with quality assurance procedures, and so on. Experience shows that this regulation model can also be distorted. For example, higher education providers can circumvent accreditation procedures through franchising schemes, schools can lie about their accreditation status, bogus accredited agencies can be created (particularly via the web), and so on.

ACADEMIC FRAUD AND QUALITY ASSURANCE: GUIDING PRINCIPLES

Given the enormous complexity of the problems, the variety of opportunities for academic fraud, and the importance of contextual and societal factors, universally applicable solutions cannot be provided to address these challenges. Each country, and institution, must be properly diagnosed and the appropriate strategies to meet these challenges must be identified. However, from the experience gained worldwide in this area, three guiding principles could be proposed for designing strategies.

PRINCIPLE 1: QUALITY ASSURANCE POLICIES SHOULD CONTRIBUTE TO A VIRTUOUS CYCLE (AND NOT A VICIOUS ONE)

In most cases, quality assurance supports accreditation and accredited institutions are fraud-free. By addressing the issues based on the type of provider, what needs to be provided, the mode, media and location of the delivery system, and the curricula and teaching content, internal and external quality assurance arrangements provide the key elements for accreditation and reduce or eliminate opportunities for academic fraud. Put differently, accredited institutions assume that quality assurance is addressed and contribute to combating academic fraud. This is the virtuous cycle. Under this circumstance, quality assurance and accreditation are central approaches for combating fraud for both new and existing forms of higher education. When in some societies, for political reasons or because of lack of resources, it is impossible to adopt quality assurance and impose accreditation procedures on institutions, there are still some pragmatic means of addressing corruption, as illustrated in the section below, Addressing the challenges.

However, a vicious cycle can occur when the challenges of quality assurance are not properly addressed and the quality assurance process offers opportunities for corruption. This is the case when the accountability of the accrediting institution or mechanism is not well
established; when the accrediting institution or mechanism is not free of collusion of interests or when it is a tool of social, political or financial pressure on the delivery system requesting accreditation. Worst of all, this occurs when the team in charge of quality assurance manipulates data and the accrediting mechanism is based on dishonest grounds. An unaccredited institution, however, is not necessarily a diploma mill. Some truck-driving schools, massage therapy colleges and even computer schools, for example, choose not to be accredited and yet still hold classes, teach students and hold them accountable for learning.

**PRINCIPLE 2: SOUND POLICIES SHOULD CONSIDER THE WIDE DISSEMINATION OF THE SOCIAL, FINANCIAL AND ETHICAL COSTS OF FRAUD**

The costs of fraud are generally either ignored or overlooked by higher education stakeholders. However, in order to mobilize authorities and the public at large against fraud, there is a need to raise their awareness about the enormous social, financial and ethical implications it can have. Consequences of fraud include greater inequity and unfairness in selection procedures, scepticism about the honesty of individuals and institutions, and therefore may gradually question the legitimacy of the tax system and the legitimacy of higher education. Fake institutions can indeed take millions from good institutions and foul the waters of non-traditional higher education.

Within this context, the ethical cost of fraud should be taken very seriously, as its consequences are potentially devastating. Two illustrations of this are: a prominent paediatrician was discovered to have forged his medical degree from the University of California; and for more than 20 years an expert witness provided scientific testimony in more than 300 cases before the California Superior Court without having the adequate credentials.

**PRINCIPLE 3: POLICIES SHOULD BE COMPREHENSIVE AND TARGET NOT ONLY ACADEMIC FRAUD BUT ALSO OTHER CORRUPT PRACTICES**

Higher education, like any other sector, is subject to corrupt practices, as it involves the management of different kinds of resources. Corrupt practices are known to affect all kinds of expenditures, including construction, purchase of equipment and materials, payment of salaries, and so on. It can take the form of misuse of physical and human resources and accompany the outsourcing of activities (for example support services to students and academics). Like at other levels of education, corrupt practices can develop when financing mechanisms (that is, per capita grants) offer opportunities for misbehaviour.

A recent illustration of the possible manipulation of statistics is offered by El Alto, the public university of Bolivia, which failed to certify its enrolment figures. As a consequence, it could not receive its financial allocation from the Bolivian gas royalty until quite recently (El Diario, February 16, 2006).

Beyond these similarities, in order to assess the various costs of corruption in higher education, it is important to keep in mind that higher education is distinctive as a socioeconomic activity in the following two respects:

- First, it is intensive in ‘specific capital investment, both human and physical’, meaning that its capital must be designed and defined specifically for the construction of buildings, the installation of training equipment and the recruitment of staff and lecturers, and so on. Because physical and human capital is to a large extent different in each case, it is difficult to standardize and therefore benchmark investment costs. Unlike manufactured goods, for instance, the supplier has much more information about the true costs than the purchaser does (the ‘information asymmetry’), which translates into greater opportunities for corruption, even when competitive bidding is in place and adhered to. This is all the more true with cross-border providers, when education is delivered via open or distance methods (especially in the case of e-teaching), and when a programme or course offered is a small or marginal part of the services offered by a mega-university or corporate institution that can easily transfer investment costs between various services.
Second, higher education is a network activity. It is not fundamentally a heap of structures but rather a flow of services, that is, training, research, certification, support services to the community, contractual arrangements with industry and services, partnership and other linkages with sponsors, and so on. Being a network activity, higher education runs two major risks: one, the range of services offered often includes areas with monopoly power, which are in the hands of either the training institution or one of its counterparts; and two, the services are not always offered by a single stakeholder or controlled in a transparent way, thus offering easy opportunities for corrupt practices supported by potential collusion of interests (sponsors may interfere in the choice of a service delivery method, a provider, equipment, and so on). This is why government authorities usually regulate the operation of institutions of higher education and require that external audits be conducted on a regular basis. At the same time, when regulators (accrediting bodies) include areas with monopoly power, and even more so, when collusion of interests occurs in regulating bodies and higher education institutions, corruption can become rampant or even pandemic. Regulators themselves may need to be regulated. On a different yet relevant note, in many countries, including the European region, access to jobs in higher education (particularly teaching positions) is not regulated by an entirely free and well-informed job market, which leads to opportunities for corrupt practices. All of these issues need to be properly taken into consideration when addressing corruption problems.

ADDRESSING THE CHALLENGES: SIX LINES OF ACTION

Six main lines of action are presented below to address the various challenges mentioned above. Examples of good practices are mentioned whenever possible, so as to illustrate the strategy.

LINE 1: REGULATING THE MARKET WITH TRANSPARENT CRITERIA

Whether the system is centralized or decentralized, with predominant control by the state or non-governmental procedures, it is necessary to regulate the operating conditions of the higher education market so as to combat fraud. This means that clear admission criteria and procedures must be set. This concern has led certain former Soviet countries to establish reliable, transparent mechanisms for administering exams for graduation from higher education. Ukraine, for instance, has created standardized national exams and Kyrgyzstan has set up a unified testing system (see Box I.7.4). It also means that clear assessment guidelines and transparent standards and processes for quality assurance and accrediting bodies must be developed. UNESCO and OECD have paved the way by formulating guidelines for quality in cross-border higher education (see the section in this volume devoted to this issue).

Of course, the issue is not only setting up transparent criteria and procedures, but also ensuring that they have been actually enforced. There have been many successful systems for checking qualifications and credentials (see Box I.7.5). All of these systems are gradually turning to e-mechanisms, either independently at the national level (for example in South Africa, China and the United States) or by soliciting the help of specialized organizations such as QualSearch in Australia or Experian in the United Kingdom. China also claims to have developed a central verification system through which the legitimacy of qualifications can be verified (www.chsi.com.cn), but there is no evidence that it is fully operational.

LINE 2: REDUCING THE RISK OF CONFLICTS OF INTEREST

An efficient means of reducing the risk of conflicts of interest among agents in charge of certification and accreditation is to establish autonomous professional bodies with fair representation of stakeholders (public...
Box I.7.5 Qualification fraud in South Africa, the United Kingdom, the United States and Australia

In South Africa, a global background verification company known as Kroll MIE (www.mie.co.za) runs a fully automated, centralized online degree verification system. The system links each university and technikon to a centralized database where third-party queries may be filed. Several countries with the same education system as the United Kingdom have come together to create a new centralized service for checking higher education qualifications. The service is based on data provided by Higher Education Futures Ltd, a subsidiary of the Higher Education Statistics Agency (HESA) and the first body of its type in the world. The service will provide employers with a single reference where they can verify an individual’s degree qualifications. The new service will be provided by Experian and will form part of Candidate Verifier, a comprehensive service that checks a range of credentials on CVs (‘t’ Magazine).

Higher education providers in the United States have traditionally outsourced the verification of qualifications. Due to the volume of verifications required, companies such as the National Student Clearinghouse (www.degreesearch.com) and Credentials (www.degreechk.com) have taken up the challenge. Australia has welcomed the introduction of QualSearch (www.qualsearch.com.au), an online authentication system designed to assess claims of qualifications conferred by Australian universities. The system draws on an existing platform that facilitates third-party queries performed via an online portal.

Box I.7.6 Australian Universities Quality Agency (AUQA)

AUQA was established under the Australian Corporations Law as a not-for-profit company limited by guarantee. It has a board of twelve directors, four of whom are elected by the CEOs of self-accrediting institutions, and one by the CEOs of non-self-accrediting institutions. Its members are the nine ministers responsible for higher education at the state, territory and Commonwealth levels.

AUQA’s objectives are to:

1. Arrange and manage a system of periodic audits of quality assurance arrangements relating to the activities of Australian universities, other self-accrediting institutions (SAIs) and state and territory higher education (HE) accreditation bodies.
2. Monitor, review, analyse and provide public reports on quality assurance arrangements in SAIs, on the processes and procedures of state and territory accreditation authorities, and on the impact of those processes on the quality of programmes.
3. Report on the criteria for the accreditation of new universities and non-university higher education courses, using information obtained during the audit of institutions and state and territory accreditation processes.
4. Report on the relative standards of the Australian higher education system and its quality assurance processes, including their international standing, using information obtained during the auditing processes.

AUQA has not yet completed its first cycle of reviews of all Australian universities and other higher education providers. The reports are available on their website: www.auqa.edu.au.

and private). A promising development in this regard is the outsourcing and subcontracting of exam management in order to limit interferences and thus lower the probability of academic fraud. Another is the establishment of independent organizations, such as the Australian Universities Quality Agency (see Box I.7.6 for more details). Private consulting firms that offer their services online to provide judgments on accredited and non-accredited institutions can also be very useful. Such institutions must comply with codes of conduct that protect against distorted behaviour such as conflicts of interest. Another important approach is to de-link bodies in charge of certification and accreditation. For example, in the medical field, Heyneman (2004) suggests that the process by which individuals apply to practise or become certified in their professions should be separate from the realm of higher education institutions: ‘No matter how excellent, no university should provide a license to practice medicine. This license should be awarded by a board of medical examiners that also manages a system of testing that all medical students must pass. Similar systems must be established for law, accounting and others. The key to this new system is to allow many higher education institutions to compete with one another.’

However, in some societies, institutional control tends to take the form of political repression. As a result, universities in these countries put up enormous resistance to quality assurance and accreditation by outside bodies. The real dilemma is that countries with a lack of social control may fuel corruption by demanding accreditation and pressing for more accountability and that countries with more established democratic traditions may limit the autonomy and thus distort the behaviour of academic institutions so as to serve the public opinion agenda.

To be effective, an accountability system should (i) clearly state the rules and procedures associated with managing the education system; (ii) provide a mechanism for monitoring compliance; (iii) specify the consequences of non-compliance; and (iv) be consistently enforced.
LINE 3: DEVELOPING STANDARDS AND CODES OF PRACTICE OF ACADEMIC INTEGRITY

Another important component of a strategy to fight academic fraud is the design and adoption of professional, ethical and honour codes of conduct for both students and teachers. A number of countries such as Canada, Hong Kong, India and the United States have had particularly relevant experiences in this regard. Comparative studies carried out by the International Institute for Educational Planning (IIEP) in this area (Nuland et al., 2006) conclude that a number of conditions are required for such codes to be effective and complied with, namely: participatory procedures for their design and maintenance; a proper information system on their content and the ‘rules of the game’, including the penalties for non-compliance; and the training of key stakeholders, including members of the education and administrative professions. The main concern is not to identify and prosecute individuals but to change the ethos and quality assurance culture by accrediting entities and academic institutions. In a context of internationalization and even more so of the globalization of higher education, special guidelines and codes of practice are required for the recruitment and support of overseas students (see Box I.7.7).

LINE 4: USING MORE EFFECTIVE AND TRANSPARENT MANAGEMENT TOOLS

More effective and transparent management tools are needed for both traditional and new forms of higher education, and for the mechanisms and bodies in charge of quality assurance and accreditations. The more systematic use of ICTs, for instance, offers the potential to detect fraud, check for plagiarism and increase the costs of corrupt practices in examination processes and in access to the labour market for higher education graduates. There are many examples of this. In the Philippines, an electronic device is used to detect fraud in exams by identify statistically improbable results (for example when grades appear to have risen sharply, or when the statistical distribution of the scores is erratic or difficult to interpret). Other countries, particularly in Europe and North America, recommend using a website to detect plagiarism (www.turnitin.com). Others recommend adopting automated procedures to manage all stages of examination. These procedures are based on the experience of Azerbaijan, where the higher education admissions process is run entirely by computer: designing tests, administering exams, grading tests, processing university admissions and informing candidates of the results. The University Grants Commission of India has decided to request that universities add computer microchips to the degrees they award to students in order to reduce the circulation of fake university degrees (Upadhyay, 2004).

LINE 5: FACILITATING PUBLIC ACCESS TO INFORMATION

Reliable and user-friendly information systems are needed in higher education and accrediting institutions. In particular, many English-speaking countries have developed directories of courses or institutions accredited by their recognized institutions and approved accreditation agencies. A directory of distance education programmes accredited by the Distance Education and Training Council is now available on the Internet at www.detc.org. In the United States, the state of Oregon has an Office of Degree Authorization (www.osac.state.or.us) and the state of Michigan has compiled a list of unapproved accreditation agencies (www.michigan.gov). Furthermore, the International Association of University Presidents has created a register of reliable accreditation agencies.

However, in the context of internationalization and the globalization of higher education, access to international reference databases on accredited higher education institutions and courses needs to be facilitated. The Council for Higher Education Accreditation (CHEA), a coordinating body for higher education accreditation, has paved the way by creating a database with examples of US accreditation obtained by higher education institutions located in 31 different countries. In addition, information on reliability, quality and standards could be made available to applicants interested in overseas courses. For example, for

**Box I.7.7 Codes of practice of Northwestern University, USA**

Developing codes of practice and standards of academic integrity for personnel of higher education institutions and overseas students: this strategy has been adopted by Northwestern University (USA), where the registration of overseas students now requires adherence to codes of conduct and to the University’s standards of academic integrity. These codes prohibit the following behaviour: falsification of any portion of the application for admission or financial aid; falsification or alteration of any academic or personal records required for participation; and plagiarism, cheating, fabrication, obtaining an unfair advantage, and so on. Students can be withdrawn from the programme at any time if they violate the codes or standards or conduct themselves in a way that brings the programme into ‘disrepute’.

all cross-border higher education, there is a need to widely publicize (on websites) recruitment fairs, course requirements and help lines, as well as rules, regulations, agreements, placement schemes for new students, and so on. One good example is South Africa, which seeks to maintain websites listing accredited overseas universities. Finally, systems to penalize institutions that provide unreliable or false information could be established.

LINE 6: ESTABLISHING AND USING AWARENESS INDICATORS OR ‘RED FLAGS’

These indicators could help various stakeholders with different levels of responsibility, including accrediting institutions, entities in charge of quality assurance, presidents and rectors of universities, department directors, academics, managers of e-training companies, funding and sponsoring agencies, students, and users of higher education graduates. The table included in the Appendix provides an example of guidelines for checking the integrity of an accrediting organization or training institution. Box I.7.8, inspired by the work of Johansson, provides a checklist of indicators or ‘red flags’ for identifying fake universities.

FUTURE TRENDS, LESSONS LEARNED AND CONCLUSIONS

The persistent growth in the demand for higher education services (see forecasts in Table I.7.1), coupled with the variety of agencies involved in the market, will sustain the pressure for more distorted practices. Fortunately, and as a direct consequence, a trend towards more transparency, accountability and ethics is simultaneously on the rise. This trend demands more regulation, the design of codes of conduct, training to fight academic fraud, better access to reliable information, separating examinations from access to jobs, and so on. At the same time, recent trends show that the nature of certification and accreditation is changing. Greater emphasis is being placed on the results and skills obtained by students rather than on the processes or means involved. In this context, the notion of ‘accountability’ of accrediting institutions and quality assurance systems might change and there may be a significant movement towards more transparency.

Furthermore, complementary action trends are already addressing the challenge of adapting existing quality assurance and accreditation mechanisms to the development and diversification of demand. These trends include voluntary cooperation among partners within the higher education profession, the creation of international lists of

### Box I.7.8 Fake universities often have one or more of the following features:

- The institution either claims to be accredited by an unrecognized organization or plays down the significance of accreditation.
- The name of the institution is remarkably similar to that of a genuine university.
- The institution often changes address.
- The name of the institution is invented or misleading.
- The institution lacks a physical address and can only be contacted by email or fax.
- Enrolment requirements are minimal.
- The institution emphasizes on its website that it is not a fake university.
- Information about fees refers to degree certificates and not tuition fees.
- Degrees are based purely on vocational experience.
- Degree requirements are minimal and degrees are awarded within a brief period.
- Illustrations of the degree certificates are published on the institution’s website.
- The logos of recognized credit card companies are shown on the institution’s website.
- Degree documents can be pre-dated.

Source: adapted from Johansson (2005), available at: http://english.hsv.se/?contentId=2181

### TABLE I.7.1

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</thead>
<tbody>
<tr>
<td>China</td>
<td>218,437</td>
<td>437,109</td>
<td>760,103</td>
<td>1,937,129</td>
<td>2,973,287</td>
<td>11.0</td>
</tr>
<tr>
<td>South Korea</td>
<td>81,370</td>
<td>96,681</td>
<td>114,269</td>
<td>155,737</td>
<td>172,671</td>
<td>3.1</td>
</tr>
<tr>
<td>India</td>
<td>76,908</td>
<td>141,691</td>
<td>271,193</td>
<td>502,237</td>
<td>629,080</td>
<td>8.8</td>
</tr>
<tr>
<td>Japan</td>
<td>66,097</td>
<td>65,872</td>
<td>68,544</td>
<td>71,974</td>
<td>73,665</td>
<td>0.4</td>
</tr>
<tr>
<td>Greece</td>
<td>60,486</td>
<td>68,285</td>
<td>75,339</td>
<td>84,608</td>
<td>89,903</td>
<td>1.6</td>
</tr>
</tbody>
</table>

Source: Global Student Mobility 2025, available at: http://www.idp.com/
quality-assured and accredited institutions and programmes, and the introduction of consultancy services for potential students and users. According to the principle of subsidiarity, a cascade of mechanisms and entities sharing different degrees of responsibility for certification are thus expected to progressively develop at different levels, as follows:

- **At the institutional level**, internal evaluation and audit systems will develop to complement external audit mechanisms. This is the case in Slovakia, where the law has introduced internal university auditing as ‘an objective activity focused mainly on operative and independent assessment of the appropriateness and efficiency of the operation of the entity covered by the audit.’

- **At the national level**, quality assurance arrangements will depend on historical factors: centralized versus decentralized higher education and the private sector share. U21 is a good example: quality assurance is not managed by prestigious universities but by an independent institution linked to a profit-making company called Thomson Learning.

- **At the sub-regional level**, independent regional, public or private accreditation agencies (for example the Central and Eastern European Network of Quality Assurance Agencies) will evaluate institutions and providers.

- **At the regional level**, regional mechanisms for monitoring and recognizing national quality assurance and accreditation systems will be strengthened. The Bologna process in Europe, for instance, favours the creation of bodies such as the European Consortium for Accreditation (ECA), which aim to make national quality assurance systems transparent – not to replace them (see Box I.7.9 on the Netherlands).

- **At the international level**, international mechanisms for monitoring and recognizing regional and national quality assurance and accreditation systems may improve and enjoy more support by stakeholders. UNESCO, the World Bank, OECD and other international institutions – public and private – will pursue initiatives in this regard. However, no excessive optimism is warranted here.

Observers say that a comprehensive international quality assurance system is unlikely to develop in the near future as a substitute for national policies and procedures because of inertia, national resistance and the practical difficulties of imposing coordination and rules of the game on an uneven galaxy of providers. Put differently, a comprehensive international higher education market is unlikely to be established soon. At the same time, some arguments suggest that, because of globalization, it is likely that strong pressure will encourage the concentration of the market of higher education providers. It may have some of the following features:

- Stable elite higher education sector (both public and private).
- A growing share of corporate institutions.
- The deterioration, if not closing down, of some traditional public higher education institutions.
- The disappearance of many private institutions.
- Great volatility and instability of small institutions.

This may have important consequences for transparency and accountability issues. Indeed, depending on the segment of the higher education sector concerned (that is, small private higher education institutions, which are not regarded as part of the ‘elite’), opportunities for corruption may remain high or grow in the future – and so will the need to address them.

### Box I.7.9 Higher education accreditation in the Netherlands

<table>
<thead>
<tr>
<th>At the national level:</th>
<th>At the European level:</th>
<th>From government, higher education institutions, businesses, and so on.</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Same requirements for public and private providers.</td>
<td>- Creation of the European Consortium for Accreditation.</td>
<td>- Public accountability through public and officially available policies, procedures, guidelines and criteria.</td>
</tr>
<tr>
<td>- Independent judgments and clear sanctions.</td>
<td>- Mutual recognition of accreditation decisions.</td>
<td></td>
</tr>
<tr>
<td>- Plurality in methods of quality assessment.</td>
<td>- Introduction of a code of good practice, which must be sufficiently independent</td>
<td></td>
</tr>
<tr>
<td>- Accreditation and quality assessment report made public.</td>
<td>- Source: <a href="http://www.qa-in.nl/">http://www.qa-in.nl/</a></td>
<td></td>
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</table>

Source: http://www.qa-in.nl/
APPENDIX: ACADEMIC CORRUPTION AND ACCREDITATION (A PROPOSAL)

<table>
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<tr>
<th>How can I determine if an accrediting organization may be a ‘mill’?</th>
<th>What questions should I ask to determine whether a degree provider is a ‘mill’?</th>
</tr>
</thead>
</table>
| If the answers to many of the following questions are ‘yes’, the accrediting organization under consideration might be a ‘mill’:  
• Does the operation allow accredited status to be purchased?  
• Does the operation publish lists of institutions or programmes they claim to have accredited without those institutions and programmes knowing that they are listed or have been accredited?  
• Does the operation claim that it is recognized (by, for example, USDE or CHEA) when it is not?  
• Are few if any standards for quality published by the operation?  
• Is a very short period of time required to achieve accredited status?  
• Are accreditation reviews routinely confined to submitting documents and do not include site visits or interviews of key personnel by the accrediting organization?  
• Is ‘permanent’ accreditation granted without any requirement for subsequent periodic review, either by an external body or by the organization itself?  
• Does the operation use organizational names similar to recognized accrediting organizations?  
• Does the operation make claims in its publications for which there is no evidence? | If the answers to many of the following questions are ‘yes’, the degree provider under consideration may be a ‘mill’:  
• Can degrees be purchased?  
• Is there a claim of accreditation when there is no evidence of this status?  
• Is there a claim of accreditation from a questionable accrediting organization?  
• Does the operation lack state or federal licensure or authority to operate?  
• Is little if any attendance required of students, either online or in class?  
• Are few assignments required for students to earn credits?  
• Is a very short period of time required to earn a degree?  
• Are degrees available based solely on experience or resume review?  
• Are there few requirements for graduation?  
• Does the operation fail to provide any information about a campus, or business location or address and provides only a post office box?  
• Does the operation fail to provide a list of its faculty and their qualifications?  
• Does the operation have a name similar to other well-known colleges and universities?  
• Does the operation make claims in its publications for which there is no evidence? |


REFERENCES/SOURCES


IDP Education Australia. Global Student Mobility 2025. Available at: http://www.idp.com/


*Times of India* (2000) Lies, damn lies ... and CV’s.