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## **ISSUES OF ACADEMIC INTEGRITY IN ACCREDITATION OF HIGHER EDUCATION (FROM THE VIEWPOINT OF FIBAA)**

This paper addresses the interplay between accreditation in higher education and academic integrity. Accreditation is a generally accepted instrument for assuring and improving quality of higher education but also considered to be effective for preventing academic malpractice. Based on the experience of FIBAA, the European, internationally oriented accreditation agency, the article describes which measures an agency can take to maintain its own integrity and how accreditation can help universities to preserve a good academic practice.

*Keywords:* Accreditation, higher education, academic integrity, academic malpractices

### **Accreditation as a way to address the problem of academic malpractices**

The main value and significance of a successful accreditation are the evidence of good quality and the reputation of the agency seal awarded to a higher education institution (HEI). But accreditation is also considered the most effective instrument for ensuring academic integrity and preventing systemic malpractice in higher education. It is no exaggeration to say that the problem of academic misconduct, i.e. violations of ethical and legal standards in higher education, is to a varying degree present in any national system of higher education. This problem is compounded by the growing massification and diversification of higher education on the global scale. German universities enjoy a solid international reputation, however they are, as several scandals over doctoral theses of the prominent German politicians and studies [1, pp. 178-181; 2, p. 36] have shown, not totally free of infringement and dishonest behaviour.

Causes and possible solutions to the problem of academic dishonesty, which includes plagiarism, academic ghostwriting, falsification of scientific data, bribes to enter a university or to get good grades, cheating in exams, buying diplomas, nepotism in academic recruiting etc., have been subject of discussions within the global academic community for decades. Recently, due to the growing importance of external quality assurance (EQA) of higher education in Europe, more attention has been paid to the role of EQA in preservation of academic integrity. In the expert community, EQA is incrementally perceived as a way to "confirm that the increasingly diverse higher education sector continues to benefit students and societies and discourages fraudulent and corrupt practices that undermine learning" [3, p. 124].

Apart from the necessity of overall transparency, one reason for the effectiveness of external quality assurance lies in the fact that EQA – and especially accreditation as one of its main forms – is based on pre-defined standards and requirements. HEIs are informed about these requirements relating to the conditions of admission to universities, qualification of teaching staff, curricula of study programmes, examination mechanisms, teaching and learning infrastructure etc. Subsequently, as part of the accreditation procedure, authorized organizations (agencies) prove the conformity of study programmes and HEIs with these quality standards. Another reason is that the accreditation by a credible accreditation body is as a rule associated with the recognition of the status of programmes and HEIs and is in many cases a necessary condition for their public funding. The third reason has to do with the publication of accreditation results, which enables interested parties, i.e. potential applicants, students and their parents, employers, governments and potential partners, to gain necessary information on institutions and their programmes [3, p. 125; 4, pp. 54-56]. A successful completion of accreditation serves as a recognized signal that a university or a study programme can be trusted. This means that accreditation also is transparent by itself and promotes the transparency.

However, in the field of accreditation there are, too, some "disreputable providers" [5, p. 7]. Along with "degree mills", which imitate being universities and sell fake diplomas, there are "accreditation mills", which are dubious accreditation agencies, awarding bogus accreditation seals for a fee. Even the established legitimate agencies may be exposed to the risk of conflict of interest [3, p. 127; 4, p. 50] and must therefore take all reasonable measures to prevent misconduct in accreditation. The development of authoritative international organizations in the field of quality assessment such as ENQA, EQAR and INQAAHE contributes to the solution to this problem, helping to "separate the wheat from the chaff" in the field of accreditation. The prevalence of the Standards and Guidelines for quality assurance in the European Higher Education Area (ESG) in Europe, which function as codes of good practice for the European quality assurance agencies, increases the importance of accreditation as a mechanism for maintaining academic integrity.

Thus, with regard to academic malpractices, accreditation plays a twofold role: it could be a significant part of the solution to problems in this area, but in some cases it can also be a part of the problem. Therefore, in the following sections of

this article we will focus on FIBAA's policy to maintain its own integrity, and then we will show how our agency helps universities in preserving respectable academic practice.

### **Integrity of FIBAA**

FIBAA's specific interest in the subject of academic integrity is related to the fact that ensuring good academic practice lies at the heart of our agency's mission since its creation. In the early 1990s, first MBA study programmes have been introduced at German universities. From the labour market perspective, the quality of this new degree was not sufficiently transparent, which produced uncertainty over qualifications of future employees on the part of employers. A necessity arose to take a closer look at the new study programmes. In 1994, the central trade and employers' associations of Germany, Austria and Switzerland, established FIBAA with the aim to ensure and make transparent the quality of MBA programmes in German-speaking countries on the basis of stringent quality criteria. By the end of the 1990s, in the course of the Bologna process, the scope of FIBAA's activities has been extended, including new Bachelor and Master programmes and HEIs in other European countries. Today, FIBAA's mission is to promote quality, comparability and transparency in international higher education by assessing and reviewing study programmes in many disciplines and HEIs in total. FIBAA awards its Quality Seal to programmes and HEIs, which have successfully completed accreditation procedures and thus proven their quality. Accreditation procedures confirm that HEIs and programmes follow the national and international standards and fulfil their own stated objectives, also with regard to academic integrity.

From the outset, FIBAA attaches great importance to ensuring the integrity of its own activities. To this end, FIBAA fulfills a number of conditions which ensure the proper functioning of all internal and external processes of the Agency.

One necessary condition is the accountability of the Agency, which aims to establish the objectivity and reliability of the accreditation procedure and its outcome and assure the credibility of the Agency to stakeholders [4, p. 60; 3, p. 130]. FIBAA achieves this goal in two main ways.

First, at national level, FIBAA has been officially registered in several countries, which implies that the Agency is accountable to the respective state authorities and other competent bodies. In Germany, FIBAA has been authorised by the German Accreditation Council (GAC) to perform Programme and System Accreditations and to award the Seal of the GAC to state and state-recognised private universities. In Austria, the Federal Ministry for Science and Research has included FIBAA in the 'Decree on Quality Assurance Agencies', which entitles the Agency to carry out audits at Austrian HEIs. In September 2016, the Swiss Accreditation Council has recognised FIBAA at national level, which means, that our agency is now entitled to perform Institutional Procedures at universities in Switzerland. In Netherlands, several staff members of FIBAA are recognised panel secretaries of the Nederlands Vlaamse Accreditatie Organisatie (NVAO) and FIBAA is thus entitled to conduct external programme evaluations at Dutch HEIs. In Kazakhstan, the Ministry of Education and Science has included FIBAA to the National Register of Accreditation

Agencies. FIBAA's decisions on accreditation of study programmes at Kazakh HEIs are thus recognised by the Ministry. After the initial registration in the respective country, FIBAA must periodically, depending on the relevant instructions, reconfirm that it fulfills the national requirements.

Secondly, FIBAA has voluntarily subjected itself to the ESG and has become a full member of ENQA as well as has been registered in the EQAR, which provides a solid foundation for FIBAA's reputation as a European agency and makes the FIBAA Quality Seals internationally recognised. In turn, FIBAA's compliance with the ESG is reviewed by ENQA and EQAR under the procedure of renewing its membership or listing every five years.

Another crucial condition for integrity, transparency and credibility of accreditation agencies is their independence from undue influence [4, p. 59], which is also one of the main requirements of the ESG [7, p. 22]. As a registered non-profit foundation, FIBAA has legal, administrative and financial autonomy, which means that our agency is solely responsible for its activities and that decisions and recommendations in its reports cannot be influenced by third parties, such as HEIs, ministries or other actors. FIBAA's autonomy is guaranteed by the regulations in the FIBAA statutes and rules of procedures as well as by the voluntary work of the FIBAA Foundation Council, accreditation and appeal commissions. All actors involved in the work of these commissions sign confidentiality agreements and impartiality declarations. The Foundation Council, which is the leading board of FIBAA, has the right to appeal against the accreditation commissions, but can not give instructions in matters of accreditation. The final decisions on accreditation taken by the FIBAA accreditation commissions are solely based on the expert reports, expert assessments as well as the statements of the HEIs. Furthermore, the accreditation commissions are free to deviate from the recommendations and resolutions of the experts when this appears necessary in view of conformity with the procedural principles. If a commissioner is not impartial (e.g. due to affiliation with a HEI), then this member does not participate in shaping the opinion and the resolution by the commission for the corresponding procedure. FIBAA's independence and freedom from instructions are proven during periodic external reviews of the German Accreditation Council, ENQA and EQAR.

One more factor, which is considered to add objectivity and strengthen the integrity of the agencies, is the participation of different stakeholder groups in accreditation procedures and decision-making [7, p. 22]. This creates "a system of checks and balances for collective oversight and thus make corrupt practices more difficult" [4, p. 54]. The main stakeholders of the external quality assurance in higher education, i.e. representatives of HEIs, professional practice and employers as well as students, are involved in FIBAA's work. FIBAA ensures fair representation of stakeholders in its Foundation Council, accreditation and appeal commissions as well as expert groups, which provides the basis for well-balanced decision-making procedures. The bodies and commissions of FIBAA are mostly international in their composition.

FIBAA's assessment of programmes and HEIs is based on the peer review procedure, which is well established in the academic sector. Experts (peer

reviewers) play a central role in FIBAA's accreditation procedures. They are involved at all stages of these procedures, from the evaluation of the self-documentation of the HEI, the on-site visit and the preparation of the expert report, up to the fulfilment of conditions. The task of FIBAA experts is to assess the quality of a study programme or HEI and to decide whether accreditation should be recommended. The assessment is based on the documentation of the HEI and the results of the on-site visit. In order to be able to provide reliable evaluation of quality and integrity in study programmes and HEIs, FIBAA takes all suitable measures to ensure the impartiality of its experts. FIBAA experts are obliged to declare their impartiality in writing for every accreditation procedure they participate in. When composing expert groups for the accreditation procedures based on specialist criteria, FIBAA carries out a monitoring of impartiality of experts to be appointed. Partiality exists for instance if an expert has been employed by or has been enrolled as a student at an applicant HEI during the past years, or if an expert has participated in joint projects with an applicant HEI in the past years, or if an expert's department has been audited by employees of an applicant HEI during the past years. If some activities of an expert lead to subsequent bias in a current procedure, this expert is obliged to inform FIBAA of this immediately. This leads to the expert's immediate removal from the respective expert team. In accreditation procedures, FIBAA project managers inform HEIs of the composition of expert teams. If there is suspected bias, the HEI has the right to express justified concerns on the composition of the expert team. In justified cases, FIBAA follows up by exchanging the expert in question. HEIs can not nominate experts for the particular procedures.

The presence of established appeals mechanism in the practice of FIBAA also lowers the risk of misconduct in accreditation procedures and contributes to the integrity of FIBAA's decisions.

### **FIBAA's contribution to academic integrity at HEIs**

There is no doubt that one of the most important features of accreditation is that it is based on pre-determined and therefore transparent quality criteria. These criteria, as stated in the ESG, have to be "explicit and published" [7, p. 19]. In order to make the studies offered by HEIs more transparent and comparable for the labour market, business, students and the universities themselves, FIBAA has developed assessment guides for programme and institutional accreditation, which contain quality requirements in the form of questions and definitions of the benchmarks. These quality criteria are designed in line with recognized international guidelines like the ESG, the European Qualifications Framework (EQF), the ECTS Users' Guide, the Lisbon Recognition Convention and others. FIBAA assessment guides assist HEIs in accreditation procedures and serve as the basis for the generation of self-assessment reports by HEIs, the external assessment of study programmes by groups of experts during on-site visits as well as for the creation of accreditation reports by FIBAA expert teams. All information about FIBAA's accreditation procedures and quality requirements as well as all

important documents, including the FIBAA assessment guides, are displayed on the FIBAA website.

The necessity to draw up a self-assessment report offers universities a good opportunity to reflect upon their administrative and study processes, critically analyzing their strengths and weaknesses. If the academic and administrative staff at a HEI actively participates in the preparation of the report, the likelihood of quality improvement at a HEI increases, since the competent professionals who are in charge of implementing reform actions are directly involved [4, p. 57].

At the core of FIBAA quality criteria lies the principle of “fitness of purpose (adequacy of goals) / fitness for purpose (adequacy of means to achieve this goals)”. First, the experts on the basis of the relevant assessment guide must ascertain that the purpose of the study programme or the HEI, as formulated by the HEI itself, is clear and convincing. Then, they prove whether these objectives can be achieved within the framework of the study programme, the system of strategic management or the quality management system of the HEI concerned. The FIBAA accreditation procedures based on this principle contribute to academic integrity of HEIs by ensuring that a HEI actually keeps the promises it has made in its mission and profile statements, statements on learning outcomes of study programmes, competences to be acquired etc.

The accreditation procedures of FIBAA address a wide range of issues related to academic integrity.

For example, by assessing the criterion “Admission” FIBAA experts have to verify whether: 1) there are clearly defined rules for admission, which are objective and fair, 2) the admission requirements ensure that only those students are accepted who will most likely be able to acquire the degree in the appropriate time, 3) the selection procedure ensures that – in case of many applications – the most qualified students are taken.

In the procedures of FIBAA programme accreditation special attention is paid to the ethical aspects: it has to be verified that ethical implications are appropriately communicated in a study programme.

FIBAA is also of the view that opportunities to practice scientific working methods are extremely important for the development of academic integrity. Therefore, under the criterion “Methods and scientific practice” FIBAA experts prove that students acquire methodological competences and are enabled to do scientific work on the required level. Students should also have enough time and opportunity to understand what good scientific practice means. In the procedures of accreditation of PhD programmes, FIBAA experts need to assess the criterion “Science and Research Based Teaching” and verify that teaching presents the current status of scientific knowledge in accordance with objectives of the programme and takes into account the associated relevant research.

Since the field of examination is often exposed to the risk of dishonesty, FIBAA experts always scrutinize the corresponding regulations of the HEIs. They prove whether 1) examination requirements are in accordance with the desired qualification level, 2) final theses are evaluated based on previously published and coherently applied criteria, rules, and procedures, 3) students’ ability to do

scientific work and the achievement of the study programme's qualification objectives are reliably ascertained. It has to be verified that study and exam regulations are legally binding and contain all necessary rules and procedures. With respect to the examination procedures for PhD programmes, it has to be verified that 1) examinations are composed in such a manner that the achieved qualifications and competencies can be determined and assessed, 2) certificates of achievement aim for a systematic understanding of the research discipline and the control of the research methods which are applied in this field of research, 3) certificates of achievement are aimed at a contribution of research which expands the frontiers of knowledge and withstands a national/international assessment carried out by scientists.

FIBAA regards the feasibility of study workload as an important condition for academic integrity. Studies show that students often plagiarize and cheat because of time pressure. Thus, during the FIBAA programme accreditation procedures it has to be verified that students can complete their studies in time with an average study time of 40 hours per week (full-time) due to adequate admission requirements, clear structure of the curriculum, even division and regular evaluation of study workload, adequate frequency and organisation of exams, provision of guidance and counseling.

FIBAA experts also pay attention to the equality of students' opportunities in the study process. It has to be verified that gender equality and non-discrimination at HEIs are ensured.

Appropriate supervision of students and postgraduates by teachers is a significant condition for a good quality of examinations and final papers and can prevent fraud. A high quality of students' supervision and support requires adequate staffing of the universities. Under the criteria related to the structure, quantity and qualification of faculty FIBAA proves whether 1) the structure and number of the faculty correspond to the programme requirements and ensure that the students reach the intended qualification objectives, 2) the qualification of the faculty (academic, scientific and pedagogical/ didactical qualification, practical experience) corresponds to the requirements and objectives of the study programme, 3) objective and fair procedures of recruiting academic staff are in place. Experts also check if student support is an integral part of the services provided by the faculty, as well as if it is offered on a regular basis and serves to help students study successfully. With regard to PhD students, it has to be verified that: 1) being allocated to a supervisor or assessor both in fact and in law secures a continual and intensive professional, methodological and scientific supervision of the doctoral students, 2) corresponding planning in the time budget is ensured.

Today, higher education is increasingly international, and HEIs actively pursue partnerships with academic institutions, enterprises and other organizations, which means, among other things, that parts of study programmes can be outsourced to the external partners when it comes to internships, semester abroad or joint programmes. Generally, this is a commendable trend, from which a study process can derive great benefit. For this to work properly, it has to be verified during the FIBAA accreditation, that in case that other academic institutions or

organizations conduct parts of the study programme, the HEI ensures that the necessary quality standards are met.

As mentioned above, evaluations by different stakeholder groups provide a comprehensive view at a study programme or HEI. Additionally, evaluation by external actors can give an entirely independent feedback on the strong and weak points of the programme or institution. Therefore, FIBAA is convinced that an effective quality management system within a HEI always embraces evaluation by stakeholders. Therefore, with respect to the internal quality assurance, FIBAA experts prove that evaluations by students, faculty and external groups (alumni, employers and third parties) are carried out on a regular basis and in accordance with a prescribed procedure, and that the outcomes of these evaluations are communicated and provide input for the quality development process.

Following the guideline of the ESG [7, p. 20], FIBAA publishes full accreditation reports on its website, which is a "necessary condition so that quality assurance can perform its accountability function and provide information to the public" [4, p. 58].

On the whole, accreditation has a great potential to contribute to academic integrity at higher education institutions. It formulates or compiles for universities criteria of good practice, based on the authoritative international and national standards and requirements. Independent experts on behalf of accreditation agencies evaluate the delivery of education services with regard to the quality criteria. Agencies make information on universities and study programmes public so that the transparency of higher education increases. At the same time, universities will always remain central to preventing academic misconduct and ensuring integrity. A good way to reach these goals is to develop a "compliance culture" [4, p. 52] within the universities, whereby the commitment to this culture should be translated into the relevant internal structures and processes of the HEIs.

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