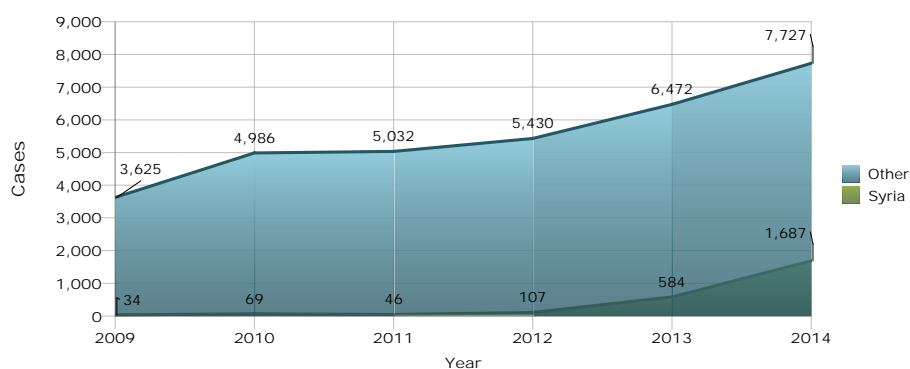


The experience of the Swedish ENIC-NARIC office in dealing with fraudulent credentials and diploma mills

Introduction

The Swedish ENIC-NARIC has more than thirty years' experience with the evaluation of foreign credentials. The number of applicants and the origin of their qualifications are essentially dictated by the ugliness of this world: turmoil and war. The mass exodus of people from Bosnia in the 90s, followed by Iraqis in 00s and now Syrians are reflected in our statistics. The number of applications during the past five years has, however, grown year by year with roughly 20 %, causing an unprecedented stress on the organisation. Faced with a balancing act of quantity versus quality the question is how the organisation can both promote the prompt integration of an ever growing number of foreign skilled labour and at the same time make sure that only individuals with proper documentation receive an assessment. This memo will try to answer that question.

Diagram 1: Number of applications for the evaluation of foreign higher education credentials 2009-2014 (Source: Swedish ENIC-NARIC.)



A holistic perspective is essential

Fraudulent credentials do not exist in isolation

Two things are meant by a holistic approach vis-à-vis fraudulent credentials. Firstly, it is essential to understand the systemic function and effect of fraudulent credentials. The purchase of fake degrees feed criminal organisations and, moreover, dilutes the value of education and accomplishment; undermine meritocracy and reward deceit and unfairness. Fraudulent credentials, furthermore, do not exist in isolation. Fraudulent credentials can very well indicate that there might be other problems with the individual's identity and CV as well. This conclusion is reflected in the logic of the fake degree industry, where it is common to offer "package deals", including a fake birth certificate, a fake passport, a fake driving license, a fake

high school diploma, a fake degree, fake recommendation letters etc. This is a profit-driven and ruthless industry that many times is involved in other crimes, e.g. money laundering, tax evasion and even terrorism.¹



The website "Superior Fake Degrees" apparently offers more than just fake degrees. Source: <http://www.superiorfakedegrees.com/>

The gatekeeper

Secondly, it is essential to understand the role/function of your organisation in society. Many times public authorities are unaware of their own crucial role in the system. Instead of understanding the whole picture, the focus is on myopic goals such as quantity and turnaround time.

On March 30, 2015, the Swedish National Council for Crime Prevention published a report with the title "The certificate that opens the door to the

¹ For example, in the aftermath of the terrorist attacks by the Norwegian right-wing terrorist Anders Behring Breivik in 2011 it was concluded that he had financed his purchase of weapons and explosives by selling fake degrees on the Internet through the website diplomaservices.com. See Pidd, H., Anders Behring Breivik spent years training and plotting for massacre, *The Guardian*, August 24, 2012 <http://www.theguardian.com/world/2012/aug/24/anders-behring-breivik-profile-oslo>; See also United States of America V Richard John Novak, Sentencing Memorandum, United States District Court, 05-CR-180-3-LRS, September 17, 2008 <http://www.justice.gov/sites/default/files/criminal-fraud/legacy/2011/02/16/09-17-08novak-sent-memo.pdf>

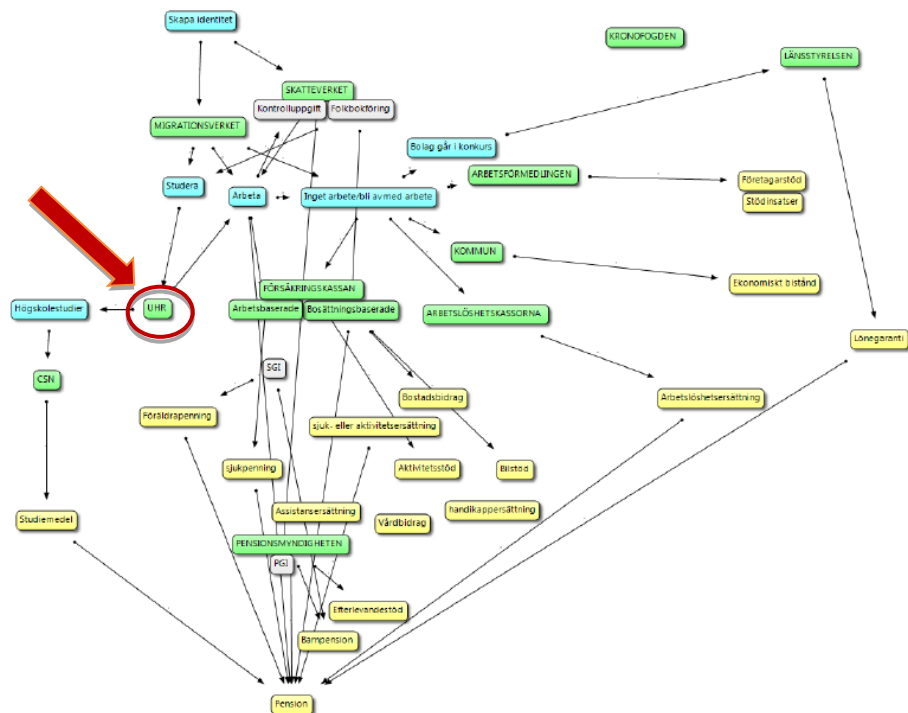
welfare system – A report on welfare offences committed using incorrect certificates.” The report was a result of a study involving 13 public authorities, including the Swedish Council for Higher Education (Swedish ENIC-NARIC.) The report vividly showed the *interdependency* of public authorities in the welfare system. Thus, it was apparent in the report that a mistake in one part of the system would accumulate over time throughout the system affecting numerous other public authorities and undermining the public trust in the system.

The Swedish ENIC-NARIC is part of the Swedish welfare state ecosystem. The organisation has a dual function:

1. To promote the prompt integration of foreign skilled labour on the Swedish labour market; and
2. To make sure that only individuals with proper educational documents are given access to the Swedish welfare state.

The gatekeeper is a person who controls access to something. Thus, the Swedish ENIC-NARIC functions as a gatekeeper. If we do not do our job properly we run the risk of becoming a laundromat for fake credentials and identities. The organisation, individuals and society will suffer.

Diagram 2: The role of the Swedish ENIC-NARIC (highlighted in red) in the Swedish welfare state ecosystem (Source: Swedish National Council on Crime Prevention.)



Tackling credential fraud in a consistent way

The Swedish Council for Higher Education is a new organisation established on January 1, 2013. In the spring of 2013 an anti-fraud task force was founded. The anti-fraud task force is an inter-departmental unit with members from the Department of Admissions and Student Information and the Department for Qualifications Recognition (i.e. Swedish ENIC-NARIC.) The mission of the task force is to develop methods and procedures to prevent forgeries in our assessment and admission process. It is, furthermore, the responsibility of the task force to monitor the matter of fraudulent credentials and increase the awareness of this issue within the agency.

Counter fraud guidelines were adopted by the Swedish Council for Higher Education in 2014. The guidelines constitute an inter-departmental document referring to the Swedish Penal Code according to which the use of fraudulent credentials is a crime. The task force involved the organisation's senior legal advisor and the document was signed by the Director General.

Additionally, counter fraud policy and procedures were adopted the same year. This document is a departmental document, referring to the mentioned Counter fraud guidelines and constitutes in effect an interpretation of the guidelines. The document provides a definition of a fraudulent document and provides information on how to verify credentials and when to file a police report.

In the recognition of foreign credentials it is essential to have functioning guidelines and policies on fraudulent credentials. This goes for ENIC-NARIC offices as well as higher education institutions dealing with admission of foreign students. Policy documents of this kind have many benefits. Firstly, these documents reflect the fact that you have acknowledged fraud as a problem and you have decided to do something about. Secondly, they provide useful definitions. Finally, policy documents contribute to consistency in dealing with fraudulent credentials.

Credentials can be trusted, part 1: The Afghan Embassy in Stockholm

Our experience with Afghan credentials goes back to the 1980s. During these thirty years we have contacted the Afghan authorities at numerous occasions without ever receiving an answer. Against this background, in 2010 we stopped evaluating Afghan credentials altogether. This was an extreme measure prompted by a growing number suspected fraudulent credentials from Afghanistan, suspected fake identities and a non-existing verification process. During the period 2010-2014 no Afghan credentials were evaluated by the Swedish ENIC-NARIC. Things, however, started to look brighter in 2014 when the Islamic Republic of Afghanistan opened an embassy in Stockholm. In December that year we met with the Ambassador and First Consular. This was followed by a meeting in April 2015, when we came to an understanding with the embassy.

According to this understanding, applicants with Afghan credentials are required to contact the embassy for verification of their ID and degree authenticity. The embassy checks the information against databases in the capital Kabul. If there is a positive match, the degree is stamped and signed by the embassy. A certificate confirming the ID of the applicant is issued as well. The verified documents are then presented to us by the applicant. The embassy has provided us with samples of the stamps used on the documents and which signatures are to be expected. There are designated contact persons at the embassy that we can turn to if we have any questions.

The co-operation with the embassy has been a success. Since April 2015 more than fifty Afghan nationals with degrees have received evaluation statements from the Swedish ENIC-NARIC enabling these individuals to pursue a profession or continue studying in Sweden.

The co-operation with the Afghan Embassy shows that issues of fraud have to be approached on a country-by-country basis, i.e. it is not always possible or advisable to work with an embassy. In this case, however, it works. By co-operating with the Afghan Embassy we can now feel confident that the credentials that are presented to us are authentic and the identity of the applicant has been checked.

Credentials can be trusted, part 2: Ukrainian and US digital solutions

Developed by the Chinese and improved by Johannes Gutenberg the printing press and printed paper has served mankind well for two millennia. Yet, in the era of laser printers, scanners and advanced computer software we cannot trust paper anymore. Instead we must seek trust elsewhere. Nowadays there are numerous digital verification tools at the disposal of the credential evaluator. For example, in 2001 the Ukrainian Ministry of Education and Science launched the *Osvita* website <https://osvita.net/ua/>. The website contains more than 20 million records and allows for the verification of both degrees and transcripts in real time. The website is trilingual (Ukrainian, Russian and English) and user-friendly. In 2014 we received 231 applications for the evaluation of Ukrainian higher education qualifications and we were able to verify 76 % of these through the *Osvita* website.² Instead of contacting institutions in the Ukraine or the Ukrainian ENIC for verification of credentials we can now easily do it through *Osvita*. The *Osvita* website both minimizes turnaround time and helps us detect fraudulent credentials. Other countries that have launched similar online verification services include Bulgaria, China, Ecuador, Kyrgyzstan, Mexico, Moldova, Peru and Russia.

An alternative digital solution to verification has been developed in the United States. In the US the official transcript – not the degree – constitutes the most

² The remaining 24 % were mostly older degrees not included in *Osvita*.

important educational document. Strict privacy laws, furthermore, prohibit the release of student information to a third party without the consent of the student.³ Against this background transcripts usually are printed on security paper and sent by postal service directly from the institution to a third party (e.g. the Swedish ENIC-NARIC.) Thus, it is common practice for institutions, employers and governmental bodies to only accept official transcripts sent in sealed envelopes directly from the student's institution.

With more than 4 000 higher education institutions, paper and postage costs are daunting. As an alternative to sending paper transcripts by postal service The University of Chicago and University of Pennsylvania started to issue *electronic* transcripts (e-transcripts or eTranscripts) in 2002. Today a quarter of all US higher education institutions (including a majority of the Ivy League universities) use e-transcripts and the number is growing. The electronic transcript is sent from the institution to an email recipient as an encrypted PDF file. The electronic document is tamper-proof and can only be accessed through a login page. Stanford University in Californian has even taken things one step further by offering electronic degrees that are sent as encrypted PFD files.

In 2012 only 4 % of the US transcripts sent to the Swedish ENIC-NARIC came in the form of electronic transcripts. In 2014 that figure had risen to about 16 %. The Swedish ENIC-NARIC gladly accepts e-transcripts from US institution as a prompt and secure way of transmitting student data.

Both the Ukrainian and US examples are testimony of a global trend toward replacing paper documents with digital alternatives. Initiatives such as the Groningen Declaration, EMREX (Erasmus+) and Erasmus Without Paper Project (EWP) promote the further development of digital solutions in the educational field. Many of the above-mentioned states that have launched online verification services are economically poor. This shows that this is not a money issue, but rather a question of priorities and political will. Bulgaria, Moldova and Ukraine are Council of Europe member states that should be praised for their work with providing secure online verifications services for educational credentials.

Diploma mills can be stopped

In June 2015 a Swedish diploma mill had the audacity to turn to the German ENIC-NARIC and asked to be registered as a recognised Swedish institution on the German-run *Anabin* list of recognised foreign institutions <http://anabin.kmk.org/anabin-datenbank.html>. Later this summer the Swedish ENIC-NARIC received enquiries from New York City and Copenhagen regarding

³ See the 1974 Family Educational Rights and Privacy Act, FERPA:
<http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

credentials from yet another Swedish diploma mill. These examples show that the problem of diploma mills is not limited to national borders.

During the past fifteen years the Swedish ENIC-NARIC has seen a significant growth in the number of cases that concern dubious institutions, including diploma mills. Virtually all cases concern entities that claim to be recognised in one or several Council of Europe member states or states that have observer status (i.e. the US.) The states of the Council of Europe are, however, not only on the delivering end of the diploma mill industry but on the receiving end as well. In other words, these “universities” should be of great concern to the COE since they undermine the value of knowledge and corrupt societies.

In 2009 the Council for Higher Education Accreditation (CHEA) and the United Nations Educational, Scientific and Cultural Organization (UNESCO) jointly published a document with the title “Toward Effective Practice: Discouraging Degree Mills in Higher Education.” The document provides a number of useful recommendations that can be adopted by the COE. The recommendations include informing the public about diploma mills and publishing lists of recognised institutions. So what works and what doesn’t?

- Relying on information to the public alone will not suffice. The Swedish ENIC-NARIC has tried this approach for fifteen years with a very meagre result. In fact, information alone does not work and it is only a bad excuse for doing nothing. Information does, however, work in combination with other (legal) measures.
- Media is your ally. In lieu of functioning legislation to combat diploma mills, consider media to be a trustworthy ally. For example, Swedish media has exposed high-profile individuals using degrees from diploma mills as well dubious institutions operating in Sweden. Media-exposure usually puts an instant end to any diploma mill, thus the Swedish ENIC-NARIC has actively fed media with all the information it has required, including *inter alia* statistics and sample degrees from fake universities.
- Publish a blacklist. The importance of publishing whitelists of recognised institutions is generally understood by the member states of the COE. This is, however, not the case when it comes to blacklists.⁴ The reason for this is probably the Council of Europe’s negative experience with blacklists in the late 1980s and early 1990s. To my understanding, the problem with these lists were that the COE tried to provide a comprehensive list of all existing diploma mills and that the list accidentally included some recognised institutions.⁵ In other words, the idea was good yet the undertaking was too large. Instead of disregarding the idea altogether, I suggest that the competent educational authority in each COE member state publishes a *national*

⁴ Blacklist: A list of people, organizations, etc., that are disapproved of or that are to be punished or avoided. Source: <http://www.merriam-webster.com/>

⁵ Council of Europe: List of Non-Accredited Institutions, Strasbourg, July 4, 1986, Doc. DECS/Rech (86); Council of Europe: Standing Conference on University Problems (CC-PU), 15th Session, Strasbourg, 31 March-2 April 1992

blacklist of non-recognised institutions claiming to be recognised or in some way connected to the country in question. In this context and for legal reasons it is important to avoid focusing on what these organisation are (i.e. diploma mills) and instead emphasis *what they are not* (i.e. recognised institutions). In order to avoid being sued for slander, it is paramount that you avoid words such as “diploma mill”, “degree mill” and “fake university” and instead use words such as “non-recognised” and “non-accredited”. The Swedish ENIC-NARIC provides a blacklist of non-recognised Swedish higher education institutions <http://www.uhr.se/sv/Information-in-English/Qualifications-recognition/ENIC-NARIC-Sweden/Non-recognised/>. Similar blacklists are provided by British Columbia (Canada), Denmark and the United Kingdom.

- Introduce laws that stop diploma mill activity and enforce these laws. Start by cleaning your own door step and realizing that organisations (including universities) and markets cannot self-regulate. Sweden is a good example of the latter. Many countries have existing laws that could be used to counter diploma mills, yet they are not enforced (e.g. Sweden.) Other jurisdictions may have weak laws that govern education, yet powerful consumer laws that are strongly enforced (e.g. Hawaii). Most effective are, however, laws that protect the key words “university” and “college” in your own language and in translation. Some US states, all provinces of Canada, Australia and some European countries have successfully introduced laws of this kind. Amongst the COE member states Norway and Denmark stand out. Norway has existing laws that protect the words “university” and “college” since 2005. Denmark introduced similar legislation in 2010. Besides protecting vital educational terminology, Norwegian law also legally defines what a diploma mill is and makes no distinction between a fake degree from a real university and fake degree from a fake university. The latter effectively stops the use of credentials from diploma mills on the labour market and for further studies.

Summary

There are no quick fixes to the problem with credential fraud and diploma mills. Nevertheless, this memo has hopefully offered some ideas on how to tackle fraudulent credentials and stop diploma mills. A holistic approach to the problem is essential: it forces you to reflect upon the function and nature of fraudulent credentials as well as your role as a gatekeeper. The memo also stresses the necessity of consistency in dealing with fraudulent credentials by adopting counter fraud guidelines, policies and procedures. The understanding between the Swedish ENIC-NARIC and the Afghan Embassy in Stockholm, furthermore, shows the value of exploring country-by-country solutions to the fraud problem. A shift from paper documents to digital credentials and verification services is long overdue. This memo shows how Ukraine provides a digital service for the verification of educational documents and how US

institutions are switching to electronic transcripts and even electronic degrees. There are also regional and global initiatives such as EMREX and the Groningen Declaration that promote the establishment of digital student data depositories and digital exchange of student data. Finally, the memo offers concrete ways to stop diploma mills with emphasis on publishing national blacklists and the introduction and enforcement of laws protecting the terms "university" and "college".

So the tools to stop fraudulent credentials and diploma mills are out there. The question is if the member states of the Council of Europe are willing to use them?

Recommended reading:

Council for Higher Education Accreditation and UNESCO (2009): *Toward Effective Practice: Discouraging Degree Mills in Higher Education*:
http://www.chea.org/pdf/degree_mills_effective_practice.pdf

Council for Higher Education Accreditation (CHEA) on degree mills:
<http://www.chea.org/degreemills/default.htm>

EAR HEI Manual: <http://eurorecognition.eu/Manual/EAR%20HEI.pdf>

EAR Manual: http://www.eurorecognition.eu/manual/ear_manual_v_1.0.pdf

EMREX: <http://emrex.eu/>

Ezell, A. & Bear, J. (2012), *Degree Mills: The Billion-Dollar Industry That Has Sold Over a Million Fake Diplomas*, Amherst: Prometheus Books. ISBN 978-1-61614-507-1.

Groningen Declaration: <http://www.groningendeclaration.org/>

Lantero, L. et al, *CIMEA - against the mills*
<http://www.cimea.it/default.aspx?IDC=2259>

National Council for Crime Prevention: *The certificate that opens the door to the welfare system – A report on welfare offences committed using incorrect certificates*, English summary of Brå report 2015:8
https://www.bra.se/download/18.779f51ff14b839896442155/1428655144146/2015_The+certificate+that+opens+the+door+to+the+welfare+system.pdf

Noah, H.J. & Eckstein, M. A. (2001), *Fraud and Education: The Worm in the Apple*, Lanham: Rowman & Littlefield Publishers, Inc. ISBN 0-7425-1032-8