

DEVELOPMENTS AND DETECTION OF EDUCATION FRAUD IN THE REPUBLIC OF ARMENIA: RISKS AND RESPONSES IN THE COVID-19 AGE

COUNCIL OF EUROPE



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Authors:

Gayane Harutyunyan

Ani Hovhannisyan

Nazani Gevorgyan

Michael Draper

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All other correspondence concerning this document should be addressed to the Education Department of the Council of Europe, Council of Europe, F-67075 Strasbourg Cedex, E-mail: education@coe.int

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INTRODUCTION

Nowadays more than ever, the issues of academic integrity and fraud have moved to the forefront of education policy agendas. International organisations, national governments, as well as civil society and professional organisations are joining their efforts to tackle the growing problem of education fraud, which seriously threatens core academic values. Higher education institutions (HEI) are establishing units on academic integrity to address fraud and corruption practices. Academic integrity groups have been created on social networks to support and empower students and to encourage their parents, academic and administrative staff to think about education differently.

■ Since the launch of the Bologna Process, the issues of academic values and integrity have been at the forefront. The 2020 Rome Communiqué¹ adopted by 49 EHEA member countries stressed the importance of shared responsibility for academic and scientific fraud and "...to fostering ethics, transparency and integrity in and through education and research and note that the Council of Europe's Platform on Ethics, Transparency and Integrity in Education (ETINED) offers the possibility for all EHEA members, consultative members and partners to cooperate to reach this goal."

■ When trying to estimate the scope of academic integrity and fraud it is important to understand the context in which it occurs. Firstly, over the last fifty years, globalisation has forced higher education into a new setting resulting in growing numbers both of home and of international students seeking better education. University degrees have become essential for securing good jobs and positions. However, the number of reputable higher education institutions offering quality education is still limited in comparison to market driven demand and the percentage of students that have access to these institutions is comparatively low. There is strong competition in the world education market for students and in particular fee-paying international students.

■ Secondly, rapid technological developments have strongly influenced the provision of education producing some lasting changes. For example, the huge potential of online education was realised with the recent COVID-19 pandemic crisis and the urgent need to organise online teaching and learning. Machine learning, artificial intelligence, blockchain and other technologies have greatly influenced higher education resulting in a number of stable solutions. Finally, technologies have had a strong impact on academic research, contributing to global collaboration and transdisciplinary research. Simultaneously, the development of technologies has also driven various forms of fraud and malpractices in the education sector.

■ The National Information Centre for Academic Recognition and Mobility (ArmENIC) of the Republic of Armenia, being a member of ENIC-NARIC Networks², and true to its mission, ensures the fair and transparent evaluation and recognition of foreign qualifications based on the principles of the Lisbon Recognition Convention (LRC)³ and national legislation. Over the years, ENIC-NARIC Networks have developed extensive knowledge and experience for combatting academic fraud and in particular fraudulent qualifications, accreditation mills, and bogus universities and diplomas. Numerous innovative instruments, procedures and guidelines were fostered to support credential evaluators working with international qualifications.

■ ArmENIC, in line with its mission and activities, has been regularly reflecting on the issues of academic fraud by studying the situation in the country, offering training to HEIs, organising events to raise awareness among the stakeholders on the issues of academic fraud and providing reliable information on the existing instruments and procedures.

1. EHEA (2020). *Rome Ministerial Communiqué*, Rome, 19 November 2020. Retrieved from http://www.ehea.info/Upload/Rome_Ministerial_Communique.pdf
2. The ENIC and NARIC Networks (jointly known as the ENIC-NARIC Networks) cooperate closely in accordance with their respective mandate, with the European Commission, the Council of Europe and UNESCO as co-secretariats. Retrieved from: <https://www.enic-naric.net/index.aspx>
3. The *Convention on the Recognition of Qualifications concerning Higher Education in the European Region* was developed by the Council of Europe and UNESCO and adopted at a meeting of national representatives in Lisbon on 8 - 11 April 1997. Retrieved from: <https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treaty-num=165>.

Furthermore, the urgent need to address various forms of fraud in education is consistently being raised by the Republic of Armenia's academic community⁴ and education beneficiaries in line with the Armenian government's anti-corruption policies.

Thus, in 2017 ArmENIC initiated the preparation and publication of the handbook on "Fraud in International Higher Education" which was the result of a study conducted by ArmEnic using funds of the micro-project grant launched in the framework of the European Union and Council of Europe project "Strengthening Integrity and Combating Corruption in Higher Education in Armenia". The objective of the handbook was to raise awareness of fraud among higher education institutions, employers, applicants, and students and to enhance their capacity to detect and combat this phenomenon.

During the research the phenomenon of fraud in international, transnational, cross-border higher education was studied through defining the most widely spread forms of fraud. Definitions and ways of detecting the main types of fraud were presented. Case studies were included to illustrate the main issues addressed. Moreover, the then current situation in Armenia relating to the growing problem of fraud in higher education was studied, and recommendations and guidelines for the detection of fraud as well as for fighting against this phenomenon were also presented. The Handbook and the results of the research were presented during a number of international events in Yerevan, Moscow, Strasbourg and Paris.

Since 2017, considerable developments have taken place especially taking into account the COVID-19 pandemic and its impact on all sectors of education. Among many other challenges, the pandemic revealed a need to reconsider the traditional tools and policies used for transparency, accountability and anti-corruption measures in education activities. The unpreparedness of the education sector to act in a crisis situation has served as a catalyst for the increase in occurrence of various forms of education fraud. Moreover, rapid technological changes have also contributed to the development of this phenomenon.

Consequently, ArmENIC initiated this publication to provide an in-depth analysis of education fraud and various forms of corruption in Armenia from the perspective of the impact that COVID-19 has had on higher education. Moreover, the study also highlights initiatives currently present in Europe in the areas of practice, policies and standards in combatting education fraud. Moreover, it presents the student perspective on education fraud. In particular this study serves to highlight the importance and value of the principles of ethical practice developed and supported by ETINED in offering a framework and recommendations for further action.

The objective of this publication is to reach a wider audience of all stakeholders and to raise their awareness on the current issues of academic integrity and fraud and their impact on the Armenian education system. Moreover, the study aims at examining the development and detection of the various forms of education fraud and corruption practices taking place during the COVID-19 pandemic and to make recommendations in the context of identified ethical principles for education.

It should be noted that the views expressed in the handbook belong to the authors and may not reflect the official opinion of the Armenian government.

4. The Ministry of Education, Science, Culture and Sport of Armenia has committed to fighting corruption as a matter of priority. The new draft Law on higher education has included articles on ethical behaviour and the need for recognised HEIs to develop Code of ethics. Moreover, universities are establishing committees of ethics to fight various forms of corruption.

METHODOLOGY

The study was conducted from May to December 2021. An extensive questionnaire was developed for the Armenian higher education institutions (HEIs). Another separate questionnaire was developed for Armenian students enrolled in different types of higher education institutions to facilitate participation in the study and present their views and position on academic fraud and various forms of corruption.

Student questionnaire

■ The questionnaire for Armenian students was focused on the following issues:

- ▶ Existing codes of conduct for the students in Armenian HEIs and whether they have been updated in line with the COVID-19 pandemic;
- ▶ Students views on what education fraud is and most common types of education fraud;
- ▶ Commitment of fraud by students, reasons and measures by the HEI for detection;
- ▶ Increase of the risks of various forms of education fraud due to the COVID-19 pandemic;
- ▶ Students' acceptance of fraud commitment and their suggestions for detection in line with the COVID-19 pandemic.

■ As for the dissemination of the questionnaire among the Armenian students, the following actions were taken by the Armenian team:

- ▶ The questionnaire was sent to student councils of 6 Armenian HEIs, namely the French University in Armenia (UFAR), Russian-Armenian University (RAU), Armenian State University of Economics (ASUE), Yerevan State University (YSU), Shirak State University (SSU), Brusov State University.
- ▶ The questionnaire was posted on the Armenian Progressive Youth's Facebook page (34,400 followers) and sent through their mailing list twice – once in June and then in early September.
- ▶ The questionnaire was disseminated by the Erasmus Student Network Yerevan Candidate Section.

■ However, it should be noted that despite all the efforts of the Armenian experts involved in the current study to disseminate and receive the students' responses to be analysed and presented in the current publication, only eight responses from individual students were received, which could not serve as reliable data to be analysed and included in the research.

■ Such a low number of responses raise a number of concerns and issues especially in relation to participation of students in the processes of policy making and changes that result in Armenian HEIs based on the recommendations of this publication. So, there is a need for further and deeper exploration on the reasons for the lack of response and to bring this problem to the surface and attention of the corresponding authorised bodies.

Higher Education Institutions questionnaire

■ As for the questionnaire for HEIs it contained the following 9 sections:

- ▶ General information about the mode of operation and provision of education programmes of HEIs as well as their views on the spread of education fraud and corruption and actions to prevent it;
- ▶ Armenia's legal framework and how it functions with corruption and education fraud in HEIs as well as institutional regulations for fraud detection and prevention and their proper implementation;
- ▶ Codes of conduct in HEIs and their proper implementation;

- ▶ The impact of the COVID-19 pandemic on corruption and education fraud in HEIs, changes made in line with the COVID-19 pandemic, challenges and successes;
- ▶ The most frequent forms of education fraud met in HEIs since 2020, the mechanisms for their detection and adaptation to challenges due to the COVID-19 pandemic;
- ▶ Awareness-raising about corruption risks and education fraud in HEIs;
- ▶ Regulation on student selection and admission, its relevance to the Lisbon Recognition Convention and corruption risks due to the COVID-19 pandemic;
- ▶ The project “Strengthening Integrity and Combating Corruption in Higher Education in Armenia” and the use of toolkits by HEIs.

■ The questions requiring both quantitative and qualitative responses were designed to facilitate an in-depth exploration into the perspective of HEIs regarding education fraud and corruption particularly in the context of the COVID-19 pandemic. Moreover, the responses provided to the questionnaire have served as the basis for the recommendations developed in the framework of the study.

■ The questionnaire was sent to 42 recognised HEIs of the Republic of Armenia. Responses were received from 24 HEIs. The list of the universities that participated is annexed to this publication (see *Annex 1*) and our analysis is based on the responses provided by them.

■ The study also focused on the development of international/transnational education providers in the Republic of Armenia from 2017 to 2021 and draws parallels between the first study conducted by ArmENIC in 2017 and the current one. This chapter of the publication also examines the impact these institutions have on the quality of education in Armenia.

EUROPEAN PERSPECTIVE ON EDUCATION FRAUD AND CORRUPTION

INTRODUCTION: EDUCATION FRAUD IN CONTEXT

■ This Chapter provides an oversight of existing International and European policies and practice in combatting education fraud with a particular focus on education fraud taking place at the level of Higher Education (HE). The views of the Council of Europe Platform on Ethics, Transparency, and Integrity in Education (ETINED) are considered in the context of the ETINED framework of fourteen principles that member States of the Council of Europe have agreed to adopt.

■ The ETINED platform is “a network of specialists appointed by member States of the Council of Europe and of States Parties to the European Cultural Convention”⁵ with a mission:

- ▶ [To] **share** information and good practices in the field of transparency and integrity in education;
- ▶ [To] **contribute** to the development of adequate answers to challenges that corruption poses to the sector of education and higher education;
- ▶ [To] **create** a virtuous cycle in education, whereby all actors commit to fundamental positive ethical principles;
- ▶ [To] **develop** capacity-building for all actors.⁶

■ ETINED has acknowledged that no state is free from corruption or fraud in education and addresses three themes of action: (1) **ethical behaviour of everyone involved in education and codes of conduct for teachers and education professionals**; (2) **academic integrity and plagiarism in the HE sector[s]**; and (3) **the problem of diploma mills in the context of the recognition of qualifications**.

■ Education fraud is closely aligned with corruption which “... has three main components that are controllable, and one that is not. The three controllable components are: opportunity, incentive and risk. The uncontrollable component is personal honesty”.⁷ Table 1 outlines examples of forms of corruption in education that were included in Volume 2 of the ETINED Ethical Principles publication.⁸

Table 1

“Good grades and exam [pass] obtained through bribes to teachers and public officials. The prices are often well known, and candidates can be expected to pay up-front” (p. 48).
“Examination results only released upon payment” (p. 49).
“Staff exploiting and abusing pupils in many different ways (physically, sexually, etc.)” (p. 49).
“Teacher recruitment and postings influenced by bribes or sexual favours” (p. 49).
“Exam questions sold in advance” (p. 49).

5. Council of Europe, 2021a: *ETINED. Council of Europe Platform on Ethics, Transparency and Integrity in Education*.

6. Council of Europe, 2021b: *ETINED Mission*.

7. National Institute of Law Enforcement and Criminal Justice, 1978, as cited in Penkauskienė, 2016, p. 41.

8. Smith & Hamilton, 2016, pp. 48-49.

■ The Magna Charta Observatory of Fundamental University Values and Rights was founded by the University of Bologna and the European University Association (EUA) with the aim of raising awareness of the importance of fundamental values in HE systems through developing guidelines and resources relating to the respect for, and protection of, the fundamental university values and rights laid down in the Magna Charta Universitatum signed in Bologna in 1988 by 388 Rectors of Universities. Work by the Observatory ‘Academic Alienation and Exploitation’ has observed higher education corruption and academic misconduct taking place at three levels:⁹

- ▶ **At the Individual Level:** such as bribery (direct and indirect), gifts, nepotism, harassment, and discrimination.
- ▶ **At the Institutional Level:** such as political influence, a lack of transparency in financing and accountability, conflicts of interest, issues with staff employment, staff evaluation and advancement criteria.
- ▶ **At the System Level:** such as the distribution of the national budget to higher education institutions.

■ ETINED’s publications offer a comprehensive list of examples of corruption and misconduct as context for member states developing their own independent relevant legislation and policies with an emphasis on addressing education fraud and corruption in education: “not simply by adopting top-down, mechanistic measures, but by attempting to achieve transparency and integrity in education based upon a commitment to fundamental positive ethical principles in professional and public life.”¹⁰

■ Although the focus of this chapter is on higher education it is important to highlight that students should develop an awareness of academic integrity before they enter higher education. The ETINED platform is strongly of the view that addressing academic misconduct in higher education cannot be done in isolation from other educational levels as academic misconduct is not simply restricted to higher education and develops at secondary or indeed primary levels of education. The development of academic integrity is best conceived as a continuum through the education journey.

ETINED: POLICIES AND PRACTICE IN COMBATting EDUCATION FRAUD

■ The two main documents outlining ETINED:

- ▶ *Ethical Principles for Education* by Ian Smith and Tom Hamilton, now published as *Resource Volume 2 for the Council of Europe Platform on Ethics, Transparency, and Integrity in Education (ETINED)*, November 2016.¹¹
- ▶ *The Ethical Behaviour of All Actors in Education* by Ian Smith and Tom Hamilton, now published as *Resource Volume 3 for the Council of Europe Platform on Ethics, Transparency, and Integrity in Education (ETINED)*, 2016.¹²

■ The fourteen **ETINED ethical principles for education** are set out below. ETINED has identified that “the first nine [principles] are in a sense more fundamental and can be applied to areas beyond education. The remaining five are more specifically education focused”:

- ▶ **Principle 1: Integrity.** Understood as behaviours and actions consistent with a set of moral and ethical principles and standards, embraced by individuals as well as institutions, that create a barrier to corruption;¹³
- ▶ **Principle 2: Honesty.** Refers to “systematically avoiding any form of cheating, lying, fraud, theft, extortion or other dishonest behaviours”¹⁴ Moreover, “social norms and values such as honesty, fairness, accountability, transparency, and integrity are critical in preventing corruption. Schools and universities have crucial roles to play in teaching these norms and values to youth to prepare them for adult life”;¹⁵
- ▶ **Principle 3: Truth.** This principle requires the unfettered pursuit of truth and the free and open dissemination of knowledge;¹⁶
- ▶ **Principle 4: Transparency.** A principle requiring clear disclosure of all relevant information including policies procedures and outcomes to facilitate understanding, participation and accountability;

9. ETINED and Others, ‘Ethical Principles’ (Council of Europe Publishing, 2016) p. 49; p. 50

10. (Smith & Hamilton, 2016, p. 55)

11. This volume is available online at: <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806c90cd>

12. This volume is available online at: <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806d2b6f>

13. Transparency International, 2009, p. 24 as cited in Smith & Hamilton, 2016, p. 37

14. Smith & Hamilton, 2016, p. 38

15. Munro & Kirya, 2020, p. 3

16. IAU-MCO, 2012, paras. 2.1-2.2, UNESCO CEPES 2004, para. 1.1 as cited in Smith & Hamilton, 2016, p. 40

- ▶ **Principle 5: Respect for others.** This involves multiple elements including consideration of the physical, emotional and mental wellbeing of others including recognition of legal rights and freedoms both on an individual, community or other organisational level;
- ▶ **Principle 6: Trust.** All actors in education should ensure their behaviour is honest and trustworthy systematically avoiding any form of cheating, fraud, theft, extortion or other dishonest behaviours;¹⁷
- ▶ **Principle 7: Accountability.** When all actors in education show respect for others and trust each other, the principle of ‘accountability’ is much more securely based so ‘that individuals, agencies and organizations are held responsible for executing their powers properly’.¹⁸ The principle of ‘accountability’ applies to all actors in education appropriate to the level of education;¹⁹
- ▶ **Principle 8: Fairness.** This fundamental principle involves treating others with impartiality and without discrimination or dishonesty;²⁰
- ▶ **Principle 9: Equity, Justice, and Social Justice.** This broad principle supports the development of policies, procedures and actions to ensure the fair and inclusive treatment of all actors in education as well as encouraging and supporting participation of underrepresented groups in education from wider society through access and the achievement of outcomes on a sustainable basis;
- ▶ **Principle 10: Democratic and Ethical Governance and Management of the Education System and Educational Institutions.** This principle involves all actors in education (as appropriate to the level of education), recognising that the governance and management of the education system, and individual educational institutions, should be based on the democratic involvement of all relevant actors and ethical management by leaders;²¹
- ▶ **Principle 11: Quality Education.** A commitment to education of the best quality possible for the benefit of all educational stakeholders and participants;
- ▶ **Principle 12: Personal and Systems Improvement.** “As appropriate to their particular contexts, all actors in education should see the principle of personal and systems improvement as calling for them to contribute as far as possible to the continuous improvement of the education system”;²²
- ▶ **Principle 13: Institutional Autonomy and Institutional Independence.** Whilst recognising the need for regulatory oversight regarding standards and ethical and legal behaviours this principle supports academic freedom and the exercise of professional expertise free from political control and management except in so far as it is necessary to facilitate a coherent educational offer;
- ▶ **Principle 14: International Cooperation.** This principle is a reminder that for academic staff in HE ‘the main motivation in international co-operation ... should be the disinterested exchange of ideas etc. as part of the world community of scholarship’. The commercial marketisation and commodification of HE through income generation by the recruitment of international students should not be the main focus on international activity.²³

■ ETINED’s recommended approach for the implementation of the principles regarding ethical standards in education is openness, integrity, participation and to focus not on results but on the process and priorities. The standards are fundamental because they help to build the credibility of educational institutions and are also important in building strong counter-fraud systems to prevent academic misconduct.

■ Key resources have been developed in order to support these capacity building measures and to assist identified groups of actors in education that should follow ethical standards and the 14 principles. These include teachers in schools; academic staff in higher education (HE); school pupils; HE students; parents/guardians/care givers/carers of school pupils; parents/guardians/care givers/carers of HE students; employers and managers within the education system; relevant public officials, and the political leaders and representatives of broader civil society more generally.²⁴

17. Smith & Hamilton, 2016a, p. 39
 18. Transparency International, 2009, p. 2
 19. Smith & Hamilton, 2016a, p. 52
 20. Smith & Hamilton, 2016, p. 41
 21. Smith & Hamilton, 2016a, p. 60
 22. Smith & Hamilton, 2016, p. 43
 23. Council of Europe, 2016, p. 50
 24. Council of Europe, 2016, p. 28

■ All members of the academic community, including institutional leadership, faculty members, administrative staff and students have a personal responsibility for and commitment to ethical behaviours and academic integrity. The credibility of educational institutions depends upon the people identified with them.

COUNCIL OF EUROPE RESOURCES RELEVANT TO ETHICAL STANDARDS IN EDUCATION

■ In order to support the above identified groups of actors, different resources have been produced to assist in preventing and addressing education fraud among the CoE member States. Based on the 'Tackling Today's Challenges Together: Corruption in Education Factsheet',²⁵ Table 2 outlines these resources.

Table 2 – Resources of the Council of Europe Relevant to Ethical Standards in Education

Committee of Ministers Recommendations Concerning Transparency, Ethics, and Integrity	CM/Rec(2022)18 of the Committee of Ministers to member States on countering education fraud
	CM/Rec(2014)7 on the protection of whistle-blowers
	CM/Rec(2012)13 on ensuring quality education (free of corruption)
	CM/Rec(2012)7 on the responsibility of public authorities for academic freedom and institutional autonomy
	CM/Rec(2000)10 on codes of conduct for public officials
	CM/Res(1997)24 on the twenty guiding principles for the fight against corruption
Key Platforms	ETINED: "In particular, the platform [ETINED] intends to crack down on fraud in education – starting with plagiarism and "diploma mills" –and to produce ethical guidelines for everyone involved in education. Honesty is set to be a key value in the guidelines" (Education for Democracy - Council of Europe, n.d., p. 1).
	Action against Corruption (Council of Europe)
Legal Instruments and Norms Addressing Corruption	The Criminal Law Convention on Corruption (ETS No. 173) and its additional Protocol (ETS No. 191) set out common standards for corruption offences
	The Civil Law Convention on Corruption (ETS No. 174)

Joint EU/CoE co-operation and capacity building projects

■ The corruption in education factsheet also includes examples of joint projects of the Council of Europe and European Union (EU) in this area such as the joint project 'Strengthening Integrity and Combating Corruption in Higher Education in Armenia (2015-17)'. This project has a special value as being the first capacity building programme in the field of strengthening integrity in education supported by the Council of Europe. The overall objective of this project was to strengthen integrity and combat corruption in the higher education system by supporting the development of prevention and integrity mechanisms for practicing professionals and increasing good governance in the field of higher education. The Project Evaluation Report concluded that 'this project has already succeeded not only in collecting information regarding transparency and accountability in higher education, but also in inspiring people to become advocates for integrity, giving them models upon which to base their own unique institutional codes of conduct, and providing benchmarks for future improvements. Project participants reported great levels of satisfaction with their accomplishments, despite having been challenged with difficult questions and sometimes voluminous workloads.'²⁶

25. This factsheet is available at: Education for Democracy - Council of Europe (n.d.). *Tackling Today's Challenges Together: Corruption in Education*. <https://rm.coe.int/16806cc3f7>

26. as cited in Council of Europe, 2018b, para. 3

ADDITIONAL RESOURCES RELEVANT TO ETHICAL STANDARDS IN EDUCATION

ETINED is also informed by and serve to complement material and resources available to the international community, for example:²⁷

- ▶ Education International (2004);
- ▶ The Declaration on Professional Ethics;
- ▶ The International Association of Universities and Magna Charta Observatory (IAU-MCO) (2012);
- ▶ IAU-MCO guidelines for an Institutional Code of Ethics in Higher Education;
- ▶ UNESCO-CEPES (2004) The Bucharest Declaration on Ethical Values and Principles of Higher Education in the Europe Region.

It has been noted that the above documents are explicitly international in nature as they have been produced by organisations with responsibilities which transcend national boundaries.

UNESCO, THE EUROPEAN UNION AND EDUCATION FRAUD

There are other relevant bodies across Europe that guide the development of national policies and legal instruments on ethics in education. For example:

- ▶ **ETICO:** “A web-based platform that regroups and disseminates all the latest information and resources on ethics and corruption in education from IIEP-UNESCO, as well as from a range of partners and stakeholders active in this field”. The IIEP is the International Institute for Educational Planning of UNESCO.²⁸

ETICO offers different diagnostic tools that are relevant to addressing and preventing academic misconduct and which are available to decision-makers for the measurement of corrupt practices within the education sector. These include:

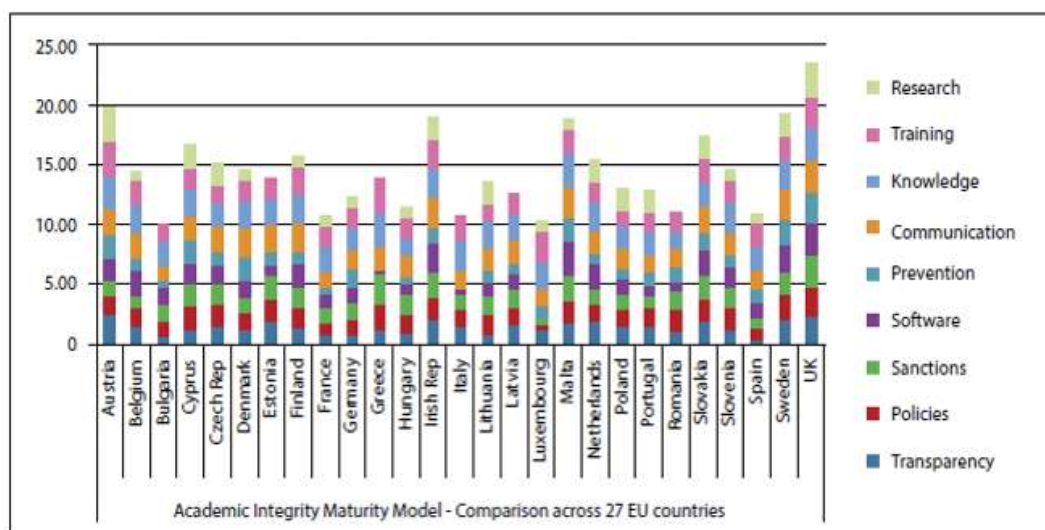
- **Integrity assessments** map the corruption risks within an education sector. The assessment exercise can encompass parts of an education system (e.g. primary, secondary or tertiary education) or an education system as a whole.
 - **Public expenditure tracking surveys** study the flow of public funds and make it possible to determine whether resources reach their intended destination or not.
 - **Quantitative service delivery surveys** or multi-purpose surveys are used to collect quantitative data on the efficiency of public spending and the different aspects of ‘frontline’ service delivery usually represented by schools in the education sector.
 - **Audits** are used to objectively identify discrepancies between the desired and the actual state of a particular area. Audits can also be used to certify the validity of the information provided in various public accounting reports.
 - **Report card surveys** are used to generate information on the quality and efficiency of the public service as perceived by users. This means of collecting information may be used to mobilise local communities in a participatory approach.
- ▶ **Education and Training 2020 (ET 2020) and The European Education Area and 2030 Strategic Framework for Education and Training:** These EU frameworks facilitate cooperation in the fields of education and training. They provide opportunities to build best practices in education policy, gather and disseminate knowledge, and advance educational policy reforms at the national and regional levels. A review on the expiry of the second framework for cooperation (ET 2020) revealed some positive trends in growth of graduate numbers but that the number of underachieving 15-year-olds remains high and the participation in adults in learning is low which has led to a further third framework for co-operation up to 2030.
 - ▶ **The European Association for Quality Assurance in Higher Education (ENQA):** contributes to the maintenance and enhancement of the quality of European higher education, and acts as a major driving force for the development of quality assurance across all the Bologna Process signatory countries.

27. Smith & Hamilton, 2016b, p. 28

28. For further information, refer to: the Advisory Statement for Effective International Practice Combating Corruption and Enhancing Integrity: A Contemporary Challenge for the Quality and Credibility of Higher Education, available at: https://unesdoc.unesco.org/ark:/48223/pf0000249460_eng. In addition, review the [Policy Forum on Higher Education Integrity](#), which was held by the IIEP in 2015 in cooperation with the Council for Higher Education Accreditation (CHEA).

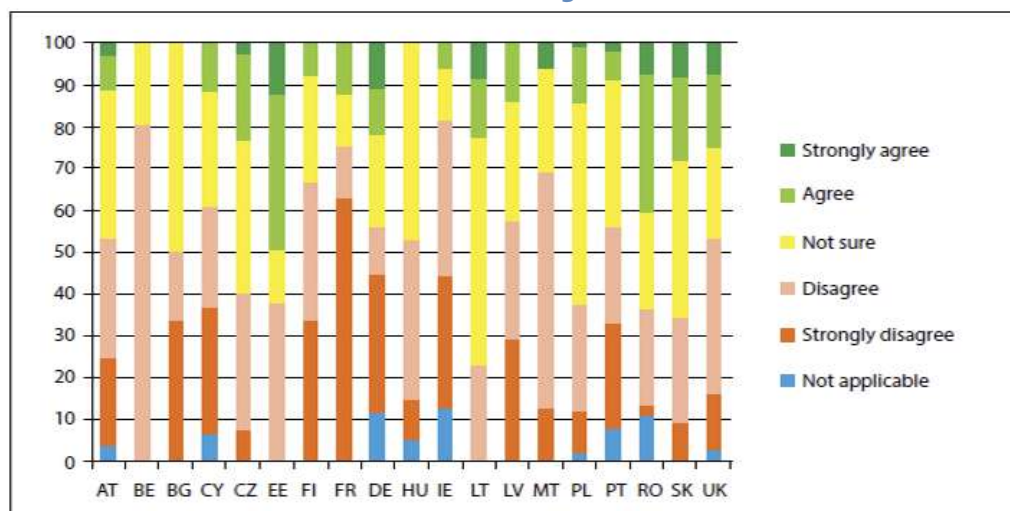
- ▶ **The European Quality Assurance Register for Higher Education (EQAR):** the official register of agencies that have demonstrated their substantial compliance with the common framework for quality assurance adopted by the 49 member countries of the European Higher Education Area (EHEA), the Standards and Guidelines for Quality Assurance in the EHEA (ESG).
- ▶ **EU Reports:** A country report was prepared for each of the 27 EU member states incorporating a set of recommendations. An overarching EU-wide report compared the results for all countries using a tool called the Academic Integrity Maturity Model (AIMM).²⁹ The report highlighted the lack of agreement between participants about what is acceptable academic practice for students, teachers and researchers. This deficit was found to apply at all levels of the survey, within and between institutions and countries. Furthermore, at the time of publication none of the EU national HE quality assurance agencies included routine monitoring of institutional policies for academic misconduct in their auditing policies, guidelines and procedures.

Figure 1 – Graph Representing the AIMM Scores and the Profiles for the 27 EU Member States Examined



Note. From Council of Europe, 2016, p. 57. Copyright 2016 by Council of Europe.

Figure 2 – Graph Showing to What Extent Student Participants Believed that All Teachers Follow the Same Procedures for Similar Cases of Plagiarism



Note. From Council of Europe, 2016, p. 60. Copyright 2016 by Council of Europe.

²⁹ Council of Europe, 2016, p. 57

■ A hybrid scorecard for academic integrity development (SAID) was subsequently developed from the AIMM model and drawing on research conducted in USA through the International Center for Academic Integrity. SAID is a **set of on-line tools developed by the team** that can be used by educational institutions to evaluate their academic integrity strategy, policies and procedures and receive feedback on areas of strength and opportunities for further development. It is based on ten characteristics indicative of “mature” policies. A version was presented at the Council of Europe’s Prague Forum on 1 October 2015 which demonstrated that the characteristics of mature policies and systems for academic integrity in HEIs included:

1. Institutional governance and strategic commitment to support academic integrity,
2. Clear and consistently applied institution-wide policies and procedures for academic integrity,
3. Fair and proportional sanctions applied across the institution,
4. Engagement and buy-in of whole academic community towards strategies for deterring academic misconduct,
5. Institutional culture and values for encouraging scholarship and deep learning,
6. Student leadership in actively supporting the institutional strategy for academic integrity,
7. Transparency, openness, maintaining institutional data, effective communications at all levels,
8. On-going evaluation, monitoring, reviews to enhance strategy, policies and systems,
9. Engagement with research and development within and external to the institution into academic integrity,
10. Institutional understanding about what is acceptable academic practice, in line with international norms.

■ The importance of student leadership in actively supporting institutional strategies for academic integrity cannot be overstated and this aspect is considered next.

STUDENT PERSPECTIVES ON EDUCATION FRAUD

■ The European Students’ Union (ESU) is an organisation which comprises 45 national student unions from 40 different European countries and represents over 11 million students in Europe, representing and promoting their educational, social, economical, and cultural interests.³⁰ In terms of academic integrity, the European Students’ Union has made it clear to the public that actions such as plagiarism, corruption, and fraud are wrong and unfair, especially for hardworking students and professors, as it undermines the foundational pillars of quality education, science, and research, and further, they have also made it clear that they would support the introduction of any new legislation which would allow a degree to be revoked in cases of plagiarism or any other violation outlined by the legislation.³¹

■ The ESU have called for “fostering academic integrity across higher educational institutions” (ESU, 2013, p. 1) and have made the following calls and resolutions:

- ▶ ‘A zero-tolerance policy of dishonest behaviour at higher education institutions’, which they spread through public debates and research, and expect and encourage administrators and faculties of higher educational institutions to adopt.³²
- ▶ The main tools to weaken an academically dishonest environment are diverse teaching methods, student-centred learning, appropriate assessment forms, and clear sanctions such as expulsion for unfair behaviour.³³
- ▶ The importance of independent arbitration councils to ensure fairness within academic participation within higher education systems, as well as mechanisms such as ombudsmen in place to ensure a transparent functioning of higher educational systems.³⁴

30. European Students’ Union, ‘About Us’ (esu-online.org), <https://www.esu-online.org/about/>, accessed 10th August 2021

31. European Students’ Union, ‘BM75: Resolution Students for Academic Integrity’ (esu-online.org, 6th December 2018), <https://www.esu-online.org/?policy=bm75-resolution-students-for-academic-integrity>, accessed 11th August 2021

32. European Students’ Union, ‘BM65: European Students’ Union calls for fostering academic integrity across the higher educational institutions’ (esu-online.org, 11th December 2013), <https://www.esu-online.org/?policy=bm-65-esu-calls-for-fostering-academic-integrity-across-the-higher-educational-institutions>, accessed 10th August 2021

33. European Students’ Union, ‘BM65: European Students’ Union calls for fostering academic integrity across the higher educational institutions’ (esu-online.org, 11th December 2013), <https://www.esu-online.org/?policy=bm-65-esu-calls-for-fostering-academic-integrity-across-the-higher-educational-institutions>, accessed 10th August 2021

34. European Students’ Union, ‘BM65: European Students’ Union calls for fostering academic integrity across the higher educational institutions’ (esu-online.org, 11th December 2013), <https://www.esu-online.org/?policy=bm-65-esu-calls-for-fostering-academic-integrity-across-the-higher-educational-institutions>, accessed 10th August 2021

- ▶ A desire for a more flexible approach to the ways in which they are assessed so that they would not be tempted to commit academic fraud, especially since assessment deadlines are rigid and bunched together when students are under enough pressure anyway.³⁵
- ▶ Condemnation of proposals that ban retrospective revoking of academic titles after a certain number of years, especially since such proposals are considered an act of disrespect to all students, graduates, and researchers when then they have made the required efforts to develop honest scientific papers.³⁶
- ▶ National student representatives should express a great commitment to quality and fair play in learning and research, and that they seek the attention of administrators in higher educational institutions.³⁷

THE IMPACT OF THE COVID-19 PANDEMIC ON ACADEMIC INTEGRITY

■ In its Roadmap *'Making the right to education a reality in times of Covid-19'* the Council of Europe emphasised the importance of the premise that 'inclusive, expansive and high-quality education is essential for ensuring that every individual can fulfil their potential academically and professionally and as informed, active citizens in their respective democracies.'

■ In its further publication *'Higher education's response to the Covid-19 pandemic: Building a more sustainable and democratic future'* the Council of Europe explored the rapid response by higher education with the move from in-person to online teaching and assessment. This move demonstrated the resilience of institutions, staff and students and avoided the suspension and cancellation of assessment which might have had a significant impact on the future of students. However, the pivot to online learning and assessment has not been without its challenges and other medium to long term consequences to the delivery of and democratic participation in higher education. New possibilities do emerge and are renewed through the role institutions can play in social cohesion and engagement with recognition of the value of research and its integrity in meeting a global crisis in partnership with the wider community, commercial or otherwise.

■ The Quality Assurance Agency of the United Kingdom (QAA) has produced a significant number of guidance documents addressing concerns in relation to academic integrity as a result of a move to online assessments which could promote or encourage academic misconduct and impersonation. The QAA emphasise the importance of strategic, institutional level approaches to cheating, learning from rather than simply relaying upon local disciplinary approaches and adopting authentication approaches including remotely supervised activities, commonly known as 'proctoring', and password protected and voice recognition software and verification. Technological responses to ensure academic integrity in examinations are not without their problems and in May 2021 the Bar Standards Board of the United Kingdom produced its independent review into the experience of the move to online assessment with an action plan grouped into five main themes to:

- ▶ improve communication and engagement with students and training providers during the exams process;
- ▶ make the centralised assessments more accessible and inclusive especially for those who need reasonable adjustments;
- ▶ make the approach to policy and process development in this area more inclusive by improving the regulator's engagement with key stakeholders;
- ▶ introduce a critical incidents policy and improve data protection and project management; and
- ▶ clarify the roles and responsibilities of training providers in the management of the centralised exams and to hold external parties to account in a more structured and formal way with clearer service expectations and performance measures.

■ The qualifications derived from the move to alternative and online learning assessment or indeed disrupted education have been the subject of consideration in a reflection document for the ENIC-NARIC networks and their stakeholders: Recognition of foreign qualifications in times of COVID-19.³⁸ In March 2020 the LRCC Bureau conducted a survey in the ENIC-NARIC networks to map out how the national information centres dealt with

35. European Students' Union, 'BM75: Resolution Students for Academic Integrity' (esu-online.org, 6th December 2018), <https://www.esu-online.org/?policy=bm75-resolution-students-for-academic-integrity>, accessed 11th August 2021

36. European Students' Union, 'BM75: Resolution Students for Academic Integrity' (esu-online.org, 6th December 2018), <https://www.esu-online.org/?policy=bm75-resolution-students-for-academic-integrity>, accessed 11th August 2021

37. European Students' Union, 'BM65: European Students' Union calls for fostering academic integrity across the higher educational institutions' (esu-online.org, 11th December 2013), <https://www.esu-online.org/?policy=bm-65-esu-calls-for-fostering-academic-integrity-across-the-higher-educational-institutions>, accessed 10th August 2021

38. Reflection document- Recognition of foreign qualification in times of COVID19. <https://www.enic-naric.net/page-reflection-document-recognition-foreign-qualifications-covid-19>

COVID-19, including challenges and good practice. The survey showed that most of the centres shifted to digital solutions to ensure smooth continuation of their activities. Moreover, in terms of recognition practices were mentioned some challenges including legal obligations to provide hard copies of a signed and stamped statement, lack of access to student records and there were concerns raised whether learning outcomes from qualifications issued during the pandemic are guaranteed. As a result, the ENIC Bureau and NARIC Advisory Board put forward possible actions to support the ENIC-NARIC networks in fair recognition of qualifications.

■ The reports mentioned above demonstrate the essential but limited nature of processes and procedures and reliance on technical solutions and serve to highlight the need for a values-based and ethical approach to learning, assessment and recognition of qualifications to serve as a framework in which those processes operate.

DYNAMICS OF INTERNATIONAL/ TRANSNATIONAL EDUCATION IN ARMENIA FROM 2017 TO 2021: IMPACT ON EDUCATION QUALITY

Diploma mills and the counterfeiting of academic documents remain a growing problem worldwide and the COVID-19 pandemic is an additional challenge for the education sector as the pandemic might encourage the rise of non-accredited institutions offering counterfeit documentation through the move to enhanced use of online and other platforms.

■ Thus, there was a need to revise information regarding international providers of education to detect new developments of fraud in all education sectors of Armenia. In the study conducted by the ArmENIC in 2017 on “Fraud in International Higher Education”, 19 international providers offering bachelor’s and master’s programmes in the Republic of Armenia were examined. Moreover, one of the main findings of the study was the obvious growing trends of international/transnational education in Armenia along with serious concerns regarding the quality of provided education.

■ The study classified the existing types of international/transnational education providers in Armenia into **branch campuses, programme articulations, virtual or distance education, offshore institutions**. Moreover, it was revealed that there were non-accredited HEIs in Armenia operating without being officially recognised. It was stated in the conclusions of the study that these types of higher education institutions seriously harm the image of the Armenian national education system and there should be proper information regarding the status of these institutions and the qualifications awarded.

■ This part of the handbook aims to give an overview of how the situation has changed since 2017. Moreover, it contains information on secondary and vocational education by identifying high schools and middle-level (VET) institutions providing international education.

■ It should be noted that since 2017 there have been certain developments in the legal framework regulating licensing and accreditation of educational institutions in Armenia. In general, the licensing regulations were enhanced which resulted in a decrease in the number of educational institutions including international providers. Furthermore, some of the Russian branch universities stopped operating as a result of stricter licensing and quality assurance regulations by the Russian Federation. Another important factor is the decreasing number of students in Armenia. Between 2009 and 2018 the higher education student population decreased by 31% and 16 institutions were forced to close their doors or merge with other private institutions. Presently, the total number of students is 80,501³⁹ and the number of foreign students is 5,896.

39. Social Situation of RA in 2020 (Armenian) https://armstat.am/file/article/soc_vich_2020_7.pdf

INTERNATIONAL HIGH SCHOOL PROGRAMMES

According to Armenian legislation, all institutions providing education should be licensed by MoESCS. There are no quality assurance requirements for secondary schools. Therefore, the handbook also presents information on whether institutions are licensed by the competent authority. The international secondary high school education programmes are offered both by the Armenian schools and international providers.

Since 2011 two Armenian private institutions namely Quantum College⁴⁰ and the Anania Shirakatsi⁴¹ School also offer International Baccalaureate programmes. The education in these schools is organised in two streams, according to the Armenian Educational Standard and the IB Diploma Programme (IBDP). After basic secondary education students can choose to study in the IBDP programme. Admission to the programme is competitive, based on the results of the required subject exams and interviews. At the end of their studies, successful students are awarded the IB Diploma. For those students who decide to continue their education in Armenian HEIs, the schools also award Secondary School Graduation Certificate (Atestat). This was a temporary solution taken by the Ministry at the time to resolve recognition problems of the IB Diploma. To award two differing qualifications at the end of a programme is an unusual situation, but can be explained because IB Diplomas are delivered to students after June-July when admission to the Armenian HEIs takes place. Furthermore, Armenian admission regulations are rigid and students without diplomas or atestat are not eligible for admission.

There is one more secondary education programme called Araratian Baccalaureate offered by Ayb Educational Foundation⁴² School. In 2014 Ayb, which is a private initiative, in collaboration with Cambridge Assessment International Education (UK) and the Institute of Education (IoE) at University College London (UCL) developed the National Programme for Educational Excellence (NPEE) aiming to transform Armenian secondary public school education by creating an alternative and internationally competitive educational curriculum for Armenian schools. In 2015 the programme was endorsed, but because of political changes in the country in 2018, it is currently only offered by Ayb Educational Foundation.

Alongside the Armenian high schools providing international education, there are also several international schools operating in Armenia.

Dilijan International School of Armenia⁴³ is one of the members of the network of United World Colleges (UWC). It was established in Armenia in 2014 to bring the transformational power of education to young people from diverse geographies, cultures and backgrounds. The founders aimed to create a school that combines the best practices of today's education and embodies the future of education.

Cambridge International School (CIS)⁴⁴ in Armenia is another international school where English is the language of instruction. The CIS curriculum is based on the programmes of the British National Curriculum, Cambridge International and the Armenian National Curriculum, starting with Early Years Preschool, Primary, Secondary and moving through to IGCSE, AS and A Level in the senior years.

Anatole France French Lycée⁴⁵ was created in 2007 (1999 for the nursery part) and is the only school in Armenia approved by the Ministry of National Education of the French Republic and recognised by a bilateral agreement signed in 2011 between France and Armenia. Tuition is provided in French, in accordance with the programmes of the French Ministry of National Education and at the end of studies students are awarded French diplomas.

QSI International School of Yerevan⁴⁶ is part of the [Quality Schools International](#) group. The Quality Schools International (QSI) is mainly for students of different nationalities whose parents temporarily reside in the country where it operates, but it is also open to others. The school offers an educational programme with an American curriculum, the language of instruction is English.

All the above-mentioned programmes are internationally recognised and students with qualifications awarded by these schools are eligible to continue their education at the next levels of education.

40. Quantum College. Retrieved from <http://www.quantum.am/en/>

41. Anania Shirakatsi. Retrieved from <http://shirakatsy.am/en/>

42. Ayb Educational Foundation. Retrieved from <https://ayb.am/>

43. Dilijan International School of Armenia. Retrieved from <https://www.uwcdilijan.org/>

44. Cambridge International School/CIS. Retrieved from <https://cisarmenia.com/>

45. Anatole France French Lycée. Retrieved from <https://lyceefrançais.am/en/>

46. QSI International School of Yerevan. Retrieved from <https://yerevan.qsi.org/>

■ However, there is one more international provider, the British International School of Armenia/BISA⁴⁷. The school with the legal name Esolarm LLC, is a private company offering training courses to individuals to obtain UK Edexcel academic qualifications. According to the website of Pearson it is an approved centre in Armenia. Pearson is a UK-based awarding organisation offering academic, vocational and work-based learning qualifications /including BTEC, Edexcel and LCCI/ through its network of agents worldwide. The British International School of Armenia organises International Advanced Level courses after successful completion of which individuals are awarded Edexcel International Advanced Level (A-level) qualifications by Pearson. Advanced level qualifications (A levels) are UK subject-based qualifications that can lead to university, further study, training, or work.

■ The main issue is the fact that as an educational institution the British International School of Armenia does not possess a license by the MoESCS to provide education in Armenia. Therefore, even if the British International School of Armenia only organises tuition and is not the qualification awarding body, the education provided by this institution is not recognised in Armenia.

■ There are certain concerns related to international high school programmes offered in Armenia. Usually, the information about the schools and programmes offered is not sufficient. In some cases, students and parents are not fully aware of the type of degree will be awarded and what kind of recognition problems may arise concerning it.

VOCATIONAL EDUCATION AND TRAINING

■ Armenian vocational education is the most underdeveloped and least popular segment of education and still has difficulties in coping with the new international dimension and rapid technological developments which demand employees that can work in this aspect. There is a need for international qualifications with the stress on professional and intercultural competences, with language skills for the international dimension in VET as well as in higher education.

■ Presently, there are no international providers in the VET sector in Armenia. Some of HEIs in Armenia have their affiliated middle-level vocational colleges that are aiming to ensure continuity of education in specific professions by preparing junior-level specialists. It can be assumed that these colleges to some extent are affected by the internationalisation policies and activities of the home universities. For the students who decide to continue their education to a higher level, the transition from college to home higher education institutions is much smoother. The affiliated colleges are sometimes indirectly used for recruiting students in higher education.

■ Before 2000, there were no licensing requirements for these types of colleges and they were operating according to the license of the home institution. The 2001 Law on Licensing of the Republic of Armenia stipulates the need for licenses for all VET institutions in Armenia no matter their affiliation. Nevertheless, after 20 years there are still a number of institutions that operate without a license.

■ Quality assurance in the VET sector has started recently and is fully funded by the Government of Armenia. The number of accredited VET institutions is still very low compared to the total number of existing institutions (11 out of 116). Accredited institutions issue state format diplomas giving access to higher education. Similarly, the non-state format diplomas issued by non-accredited VET schools also give access to higher education. This is a rather worrying situation and most probably will not be resolved in the nearest future.

■ The COVID-19 pandemic has influenced the vocational education and training sector and the MoESCS is currently revising its sectoral policies to take into account the consequences of the pandemic.

■ Currently, there are only two foreign universities with affiliated colleges providing vocational programmes.

- ▶ Ternopil National Economic University Scientific-Educational Centre in Yerevan (Ukraine)⁴⁸
- ▶ Plekhanov Russian University of Economics, Yerevan branch.⁴⁹

47. British International School of Armenia/BISA. Retrieved from <https://bis.am/>

48. Ternopil National Economic University Scientific-Educational Centre in Yerevan (Ukraine). Retrieved from http://www.eftneu.am/?page_id=3406&lang=hy

49. Plekhanov Russian University of Economics, Yerevan branch. Retrieved from <https://www.rea.ru/en/org/branches/Pages/erevan.aspx>

International colleges are still operating on the basis of the permanent license issued to the higher education institution by the MoESCS of Armenia. It is not clear what are the quality assurance mechanisms. At the end of the educational programme, the graduates are awarded a recognised diploma of their home country.

However, in the case of Russian colleges, there is no indication in the diploma regarding the city or country where the education was provided. Thus, it is difficult to find out whether the programme was provided by the main education institution or by one of its branches.

INTERNATIONAL HIGHER EDUCATION

The present study also aims to find the effectiveness of recommendations made by the 2017 study on “Fraud in International Higher Education”.

There are now only 10 international HEIs operating in Armenia whereas in 2017 the number was 19. Since 2017 the ministry has revised the licensing and accreditation regulations which has played an important role in the closure of non-recognised providers. It should be mentioned that ArmENIC is regularly updating information to the ministry and universities on these types of providers.

Presently, there are various type of international education providers in Armenia (branch campuses, franchising, offshore institution). Russian, Ukrainian and Belarussian branch campuses are accredited within the home institutions and licensed by the MoESCS.

- ▶ Plekhanov Russian University of Economics, Yerevan branch
- ▶ Ternopil National Economic University Scientific-Educational Centre in Yerevan (Ukraine)
- ▶ Moscow State University after M. V. Lomonosov⁵⁰
- ▶ A. D. Sakharov International State University, Yerevan branch⁵¹
- ▶ Armenian Institute for Tourism, the Branch of Russian International Academy for Tourism⁵²
- ▶ St. Petersburg Institute of Foreign Economic Relations, Economics and Law Yerevan branch⁵³
- ▶ American University of Armenia⁵⁴
- ▶ French University in Armenia⁵⁵
- ▶ Russian-Armenian (Slavonic) University⁵⁶
- ▶ City College, University of York.⁵⁷

International providers in Armenia have a high level of autonomy mainly relating to admissions and to the recognition of foreign qualifications.

One of the main concerns with branch campuses in Armenia remains the same – usually the branch name is not indicated in diplomas, misleading employers.

Another issue concerns St. Petersburg Institute of Foreign Economic Relations, Economics and Law Yerevan Branch. The home institution lost its accreditation in the Russian Federation in 2018 and according to the QA regulations, the Yerevan Branch also lost its accreditation. As a result, the students that were studying at that time were transferred to another Russian university the Institute of International Law and Economics named after A. S. Griboedov to be able to finish their education. The Yerevan branch continues its operations as a recruiting agency which is permitted according to Russian regulations. According to unverified data, the agency continues to provide educational services and it is impossible to find out whether holders of the Institute of International Law and Economics after A. S. Griboedov in Armenia really studied at the university. It is even more worrying as it is not clear how well students are informed on the real situation.

In 2017 the study identified some problems related to an MBA programme offered in Armenia by the University of Sheffield (UK) through its international faculty/City College/ operating in Greece. After several years the MBA programme in Armenia was stopped.

50. Moscow State University after M. V. Lomonosov. Retrieved from www.msu.am, www.msu.ru

51. A. D. Sakharov International State University, Yerevan branch. Retrieved from <http://www.iseu.bs.by/ru/>

52. Armenian Institute for Tourism, the Branch of Russian International Academy for Tourism. Retrieved from <http://www.ait.am/>

53. St. Petersburg Institute of Foreign Economic Relations, Economics and Law Yerevan branch. Retrieved from <https://www.spyur.am/ru/home>

54. American University of Armenia. Retrieved from <https://aua.am/>

55. French University in Armenia. Retrieved from <https://ufar.am>

56. Russian-Armenian (Slavonic) University. Retrieved from <https://rau.am>

57. City College, University of York. Retrieved from https://york.citycollege.eu/frontend/index.php?chlang=AM_EN

■ However, the situation has developed and instead of the MBA programme offered by the University of Sheffield, there is another European HEI providing an Executive MBA programme. The most surprising is that the websites of the two universities look very similar.

■ According to the information from the media CITY College, the University of York Europe Campus jointly with the Faculty of Economics and Management of the University of Strasbourg offers Pan-European Executive MBA dual degree programme in Yerevan. Successful students will be awarded two MBA degrees from two universities: The University of York and the University of Strasbourg.

■ At first glance it may seem that there is nothing unusual about this programme; we have two accredited/recognised higher education institutions providing dual degree programmes. However, the programme is not provided directly by the University of York, but through the City College franchising operating in Greece. According to Greek legislation, colleges are providers of post-secondary, non-formal education and training exclusively within the framework of validation or franchising agreements with higher education institutions recognised by the competent authorities of the country of their seat. The degrees awarded under franchising agreements are degrees awarded by the foreign institution and not by the College. The aforementioned degrees awarded are not recognised as equivalent to university degrees, although the recognition of professional equivalence is possible.

■ City College has been granted a new license to operate as a college under 108278/IA/5-8-2013 (Official Bulletin No 2012 B'), with effect from September 1, 2013. The College can provide Bachelor's and Master's degrees under the aforementioned license exclusively within the framework of a franchising agreement with the university in the United Kingdom and France.

■ In Armenia, for a diploma to be recognised, the HEI has to be accredited both in the country where it is from and in the country where its campus is. Thus, the recognition of the above-mentioned HEIs is difficult as they are not accredited in Greece, but they are accredited in their country.

■ The study demonstrated that generally, the pandemic has the same impact on international providers as on the Armenian universities. Moreover, it is difficult to assess the effects that COVID-19 caused on their operations. Besides, the number of international non-recognised providers of higher education has decreased compared to 2017.

■ However, additional and continuous steps should be taken to improve the current situation taking into account the high autonomy of international providers of education in Armenia:

- ▶ The Government and competent authorities should periodically monitor activities of international providers of education in Armenia and make the licensing procedure stricter for them.
- ▶ The fraud and corruption control policy should be developed to give monitoring more structure and to have strategic approach.
- ▶ Higher education institutions should do thorough research on foreign institutions before making any agreements or providing joint programmes.
- ▶ Information regarding the status and recognition of international providers of education should be transparent and available for applicants, students, their parents and employers. Awareness will prevent further violations.

PERSPECTIVE OF THE HIGHER EDUCATION INSTITUTIONS OF THE REPUBLIC OF ARMENIA ON EDUCATION FRAUD AND CORRUPTION IN TIMES OF COVID-19

Among other aspects, the COVID-19 pandemic had a huge impact on global education. The uncertainty created as a result of lockdowns, the online mode of operation of higher education institutions, the adaptation of traditional procedures and tools was and remains challenging. The pandemic also revealed the gaps in the higher education system and a need for improvement so that education remains relevant and meets the needs and objectives of all the actors involved in the process.

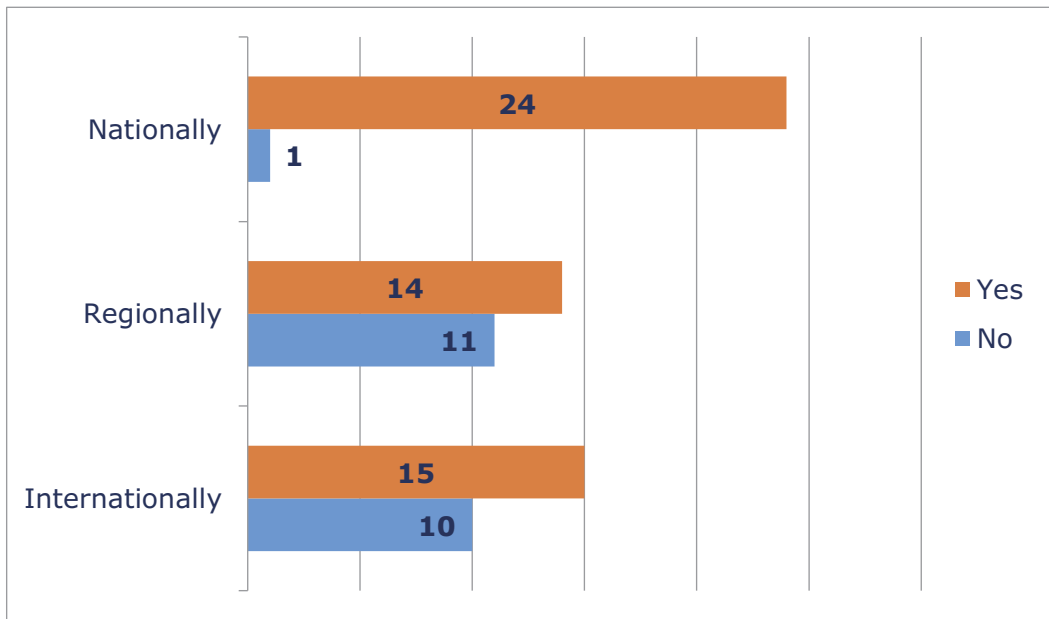
■ Corruption and various forms of education fraud have always been present in higher education. With the creation of a new environment caused by the COVID-19 pandemic for the provision of activities performed by HEIs and digital transformation, the importance of rethinking and strengthening transparency and accountability policies and procedures of higher education institutions is critical. Traditional anticorruption policies and procedures are insufficient to address the present crisis situation related to the pandemic. There is a lack of reliable data to determine whether academic integrity and fraud has been increasing with the pandemic or not. Nevertheless, there has been a diversification of irregularities, including malpractice in teaching and research, misconduct of students, teachers and staff, questionable governance under the crisis, mismanagement of various funds including research funds, etc.

■ Thus, this part of the study aims at reflecting the views of the Armenian HE sector on the various forms of education fraud and corruption risks in line with the impact of the COVID-19 pandemic. It also studies the relevance of the national legal framework and its functionality, codes of conduct in HEIs, the most frequent forms of education fraud observed in HEIs, student selection and admission procedures as well as the experiences of HEIs overcoming the challenges caused by the pandemic and in particular their successful experiences.

HEIs' VIEWS ON EDUCATION FRAUD AND CORRUPTION

■ Thus, *Figures 1* and *2* provide general information about the mode of operation of HEIs and the type of education programmes they provide.

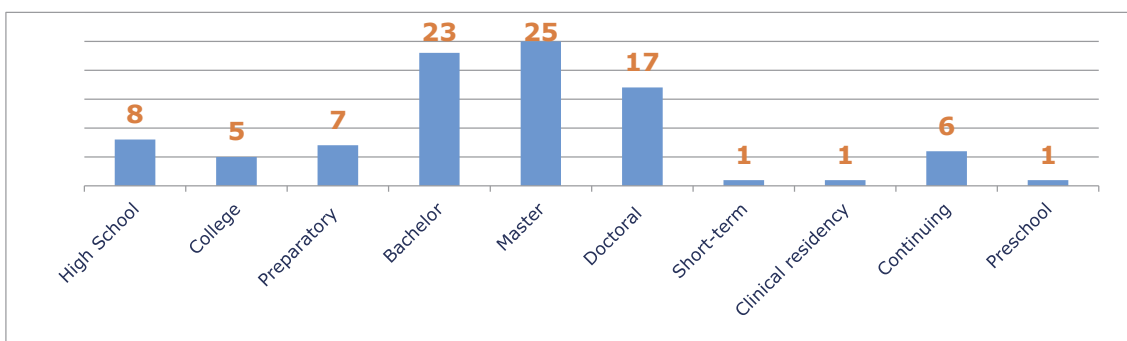
Figure 3. Does your HEI operate nationally, regionally and/or internationally?



The analysis of the responses showed that there were two main reasons for HEIs to choose the option of operating regionally: the location of the HEI (in one of the regions of Armenia) and having a branch in the region. As for choosing international operation, again two main reasons were given which were the presence of international students in their HEI and international cooperation.

None of the Armenian HEIs have transnational provisions and there are no intentions to expand Armenian education to other regions and countries in the near future. The existing joint or dual degree programmes, and joint research projects are initiated by other international providers and funded by international bodies.

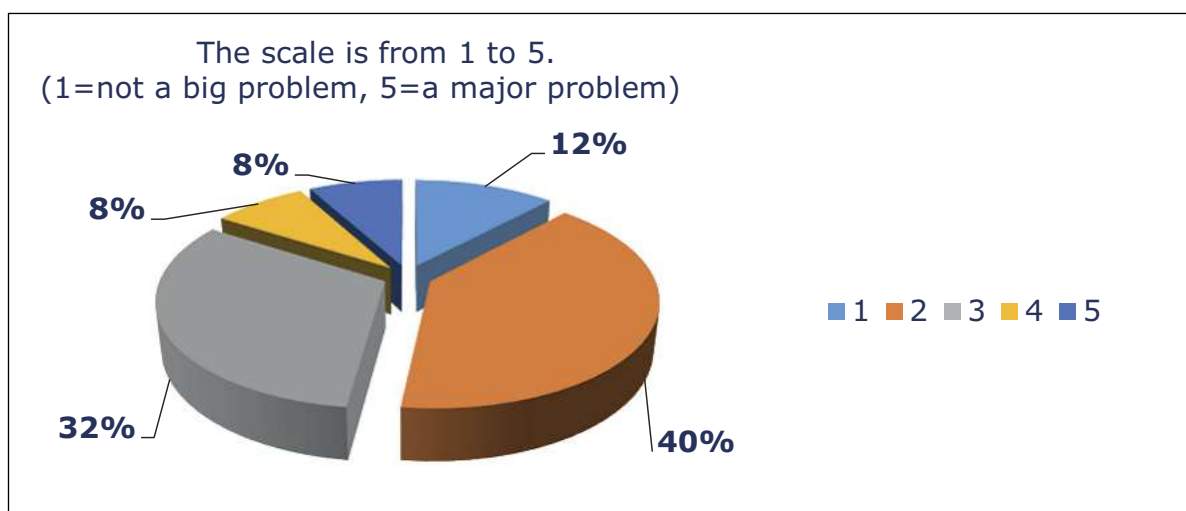
Figure 4. What kind of education programmes do you provide?



The figure shows that the majority of HEIs offer bachelor's and master's programmes. Doctoral programmes are offered only by 17 and preparatory programmes only by 7 HEIs. Some of the universities have high schools, colleges and one university has a pre-school. Clinical and continuing education is offered by medical HEIs but considering that only 2 medical universities participated in the survey it is clear that some of the institutions regard short courses as continuing education. Generally, the number of the Armenian HEIs offering short courses is not high.

Figure 3 shows whether the problem of corruption in education and various forms of fraud is an emerging issue in the Republic of Armenia. Moreover, the respondents were asked what the core factors could be for the latter ones and what can be done to prevent them.

Figure 5. How big do you think is the problem of corruption in education and various forms of education fraud in Armenia?



40% of the respondents indicated that the problem of corruption and various forms of education fraud is not that big in Armenia, and only 8% indicate that it is a major problem. 32% of the respondents think that the problems of academic integrity, various forms of fraud and corruption exist but they are not major.

The core drivers for corruption in education and various forms of education fraud in Armenia, are as follows:

- ▶ Protectionism and favouritism in grading and academic recruitment;
- ▶ Outdated management and legacy of its pre-1991 past;
- ▶ Low salaries, personal interest, underdeveloped labour market;
- ▶ Lack of control and anti-corruption mechanisms, the government's and authorities' interference with the HEIs;
- ▶ High dependence on tuition fees, a large amount of private HEIs, many duplicated and unnecessary education programmes;
- ▶ Low quality of educational services;
- ▶ Lack of transparency in admission and examination procedures;
- ▶ Plagiarism, academic dishonesty and corruption;
- ▶ Falsification of grades, diplomas and other documents, low level of knowledge about copyright issues, imperfection of the evaluation systems;
- ▶ Use of digital resources;
- ▶ Giving preference to providing degrees and other academic awards rather than to knowledge acquisition;
- ▶ Students admitted only for diploma, lecturers abusing their position;
- ▶ Undesirable cooperation between the teaching staff and students;
- ▶ Students' non-purposeful desire for getting education;
- ▶ Indifference to education demonstrated by society.

As for the actions to be taken to prevent corruption and fraud practices in higher education, the respondents underlined that the impact made by the COVID-19 pandemic on education and research intensified the need to reconsider the ethical approaches existing in the HEIs. Moreover, it was stressed that although codes of conduct were required as regulators of the relations of all groups involved in the educational process, there were no common approaches for their implementation. Thus, HEIs should develop fair and consistent policies, appropriate procedures and response structures for enhancing programmes for the promotion and awareness-raising of academic ethics.

In particular, the following actions were suggested:

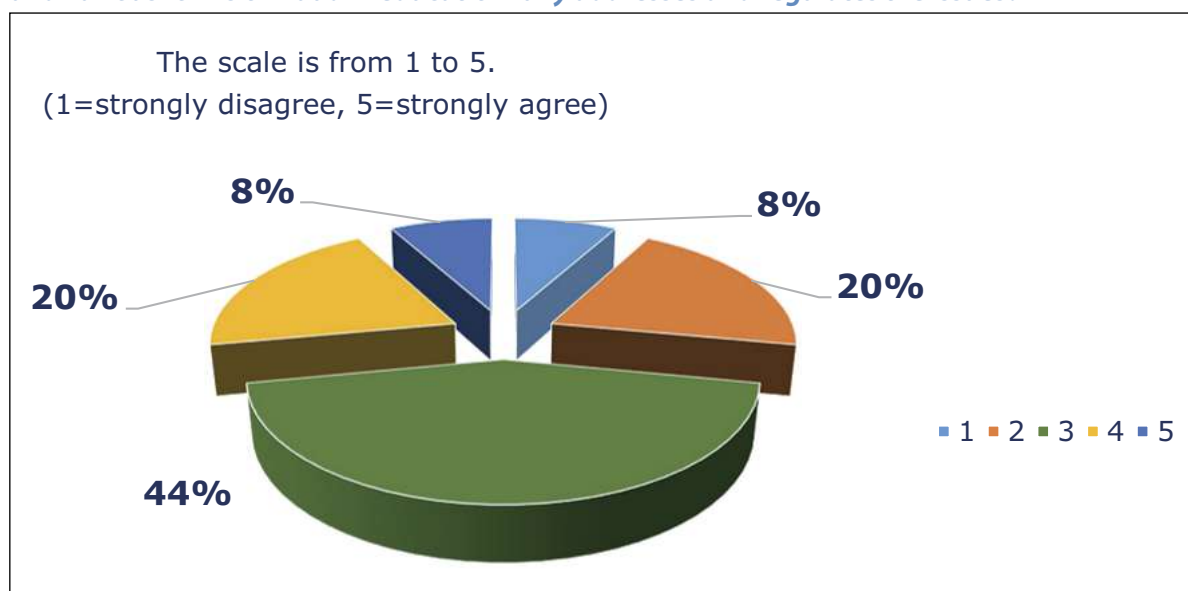
- ▶ Reinforce academic integrity culture and fight against plagiarism with the help of legislative mechanisms and anti-plagiarism programmes;

- ▶ Develop and use systemic mechanisms to prevent the practice of corruption and fraud;
- ▶ Create a knowledge-based economy and introduce effective ethical mechanisms;
- ▶ Implement the measures defined by the Republic of Armenia Anti-Corruption Strategy approved by the Republic of Armenia Government Decision N 1141-N of September 25, 2015;
- ▶ Review and update the existing regulations and procedures and implement tools developed in the framework of the Council of Europe's (CoE) project "Strengthening Integrity and Combating Corruption in Higher Education in Armenia";
- ▶ Raise the level of responsibility of all actors of HEIs and develop appropriate regulations and mechanisms;
- ▶ Strengthen control mechanisms in HEIs by taking steps to objectify the evaluation process and reduce the human factor;
- ▶ Increase salaries and the state funding of HEIs which will minimise the university's financial dependence on tuition fees;
- ▶ Increase the autonomy of universities and ensure the equality of public and private universities;
- ▶ Perform strict monitoring over educational documents and create an integrated database;
- ▶ Raise the level of legal awareness of society about education fraud and corruption;
- ▶ Organise international training for the actors in HEIs;
- ▶ Establish an independent committee for inspecting education fraud.

REPUBLIC OF ARMENIA LEGAL FRAMEWORK, ITS FUNCTIONALITY AND INSTITUTIONAL REGULATIONS

In this section of the questionnaire, the respondents were asked to express their views about the full functionality of the Republic of Armenia legal framework for corruption and various forms of education fraud (see Figure 4). Moreover, they were asked to provide the reason(s) for choosing the answer. This part of the questionnaire was followed by the questions regarding the institutional regulations addressing education corruption risks and various forms of education fraud (see Figure 5) and their proper implementation (see Figure 6).

Figure 6. Do you agree that the current Republic of Armenia legal framework for corruption and various forms of fraud in education fully addresses and regulates the issues?

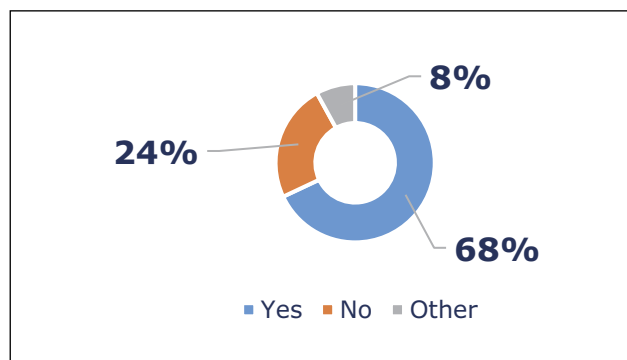


44% of the respondents indicated that they neither agree nor disagree with the full regulation of the current Republic of Armenia legal framework for corruption and various forms of education fraud, and answers were equally distributed among those who disagreed with the statement and agreed with it. Moreover, the views were on the same level for strong agreement or strong disagreement with the statement.

Regarding the reasons for choosing the corresponding answers, the analysis shows that those who strongly disagree (8%) that the current Republic of Armenia legal framework fully addresses corruption and various forms of fraud indicated that the framework encourages corruption and no updates have been made. Those who disagree (20%) indicate that the framework does not address the public demand, there is no provision in the current Republic of Armenia Law on Higher and Postgraduate Professional Education on codes of academic ethics (the new draft Law on Higher Education and Science includes several provisions on academic ethics and codes of conduct), and the existence of various forms of corruption in the Armenian education system make it uncompetitive with western universities while the current form of the legal framework is not able to address the issue. The summary of the reasons indicated by the majority of the respondents who neither agree nor disagree (44%) with the full functionality of the legal framework is that the current legislative regulations offer solutions and partially address the issue. Adopted in 2004, it does not address the rapid development of higher education, thus it needs reviewing and updating. Moreover, under the current Republic of Armenia Law on Higher Education institutional autonomy is restricted in the areas of admission, quality assurance procedures, etc., while the Republic of Armenia by-laws, government decisions and regulations for HEIs are contradictory and have gaps. As for those who agree (20%) with the proposed questions they state that the legislation works, but there are shortcomings. In particular, it needs to be transformed and updated. Finally, those respondents who strongly agree (8%) indicate that the current legal framework fully manages its tasks.

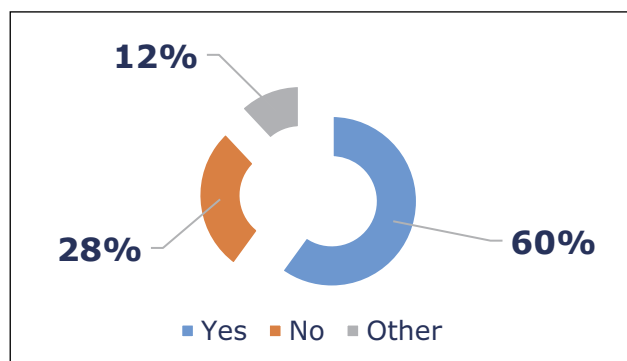
With regard to the institutional regulations addressing education corruption risks and various forms of education fraud (see Figure 5) 68% of the respondents indicated that they have institutional regulations, while 24% stressed that they do not and 8% responded that they regulate the issues by the current Republic of Armenia legal framework. Moreover, 76% of those stating that their HEI does have institutional regulations provided the corresponding links.

Figure 7. Do you have an institutional regulation addressing education corruption risks and various forms of education fraud?



As to the proper implementation (see Figure 6) of the institutional regulations, 60% of those who answered that they have institutional regulations state that they are properly implemented, while 28% indicate the opposite. As for those who choose the "other" option they specify that the implementation is mostly properly.

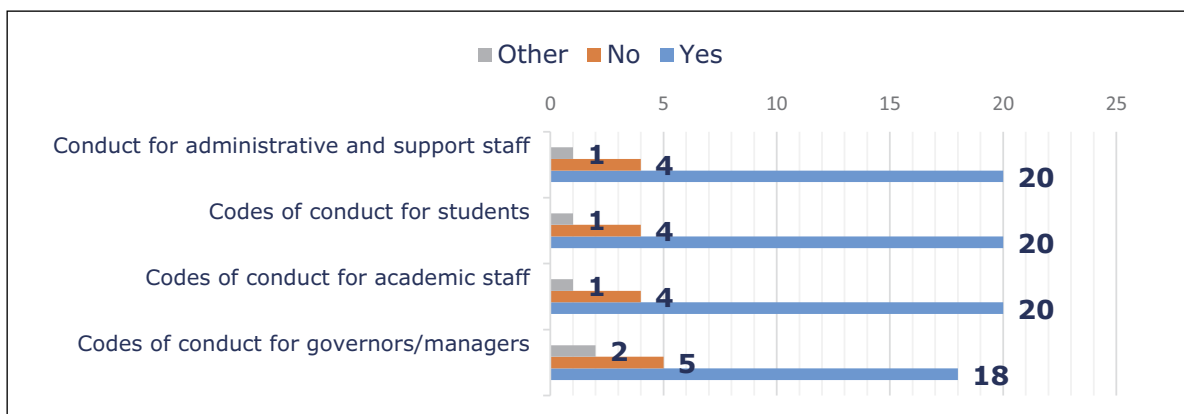
Figure 8. If yes, are they properly implemented?



CODES OF CONDUCT IN HEIs AND THEIR IMPLEMENTATION

This part of the questionnaire focused on the availability of codes of conduct in HEIs. In particular, the section provided information on whether there are codes of conduct for HEIs' governors/managers, academic staff, students and administrative and support staff (see *Figure 7*). Then the respondents were requested to provide corresponding links. These questions were followed with ones to assess the level of proper implementation of the codes of conduct (see *Figure 8*), changes made in line with the COVID-19 (figure 9), information about the reason and content of the changes as well as the challenges regarding the implementation and successful experience overcoming the challenges.

Figure 9. Does your HEI have codes of conduct for governor/managers, academic staff, students, administrative and support staff?

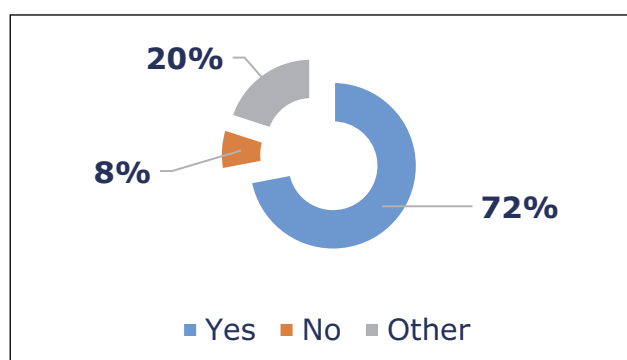


Only 13 respondents that answered positively in the above-mentioned questions provided links to their codes of conduct.

As for the proper implementation of the codes of conduct in HEIs, the analysis showed that 18 HEI state their codes of conduct are properly implemented, while 2 of them indicate the opposite. 5 HEIs have chosen the option "other" by specifying the following:

- ▶ Cannot answer;
- ▶ Does not fully operate;
- ▶ Implementation has just started and is in process;
- ▶ The impact has not been measured.

Figure 10. If yes, are they properly implemented?

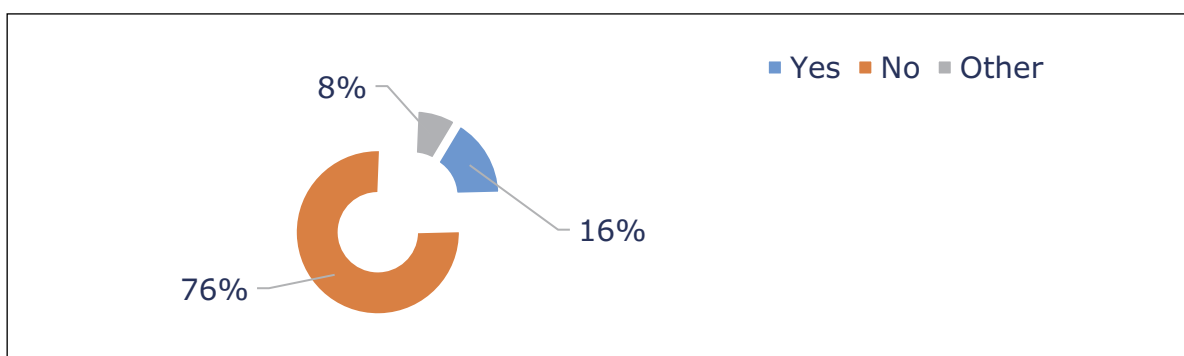


THE IMPACT OF THE COVID-19 PANDEMIC: CHANGES, CHALLENGES AND SUCCESSES

This section of the questionnaire aims to reveal what impact the COVID-19 pandemic has had on the corruption and education fraud in HEIs, what changes have been made in line with the pandemic and to specify the challenges and successful experiences.

19 HEIs stated that they have not made any changes to their corresponding regulations and codes of conduct in line with the COVID-19 pandemic, while 4 of them have made changes and 2 HEIs indicate the option “other” specifying the rector’s order for minimising corruption risks caused by the COVID-19 pandemic and updates received by the Ministry of Education, Science, Culture and Sports (MoESCS) of the Republic of Armenia.

Figure 11. Have you made any changes to the codes of conduct and regulations addressing corruption in education and education fraud in line with the COVID-19 pandemic?



Regarding the reasons for changes, they are as follows:

- ▶ Requirements of the anti-pandemic measures;
- ▶ Online and hybrid formats of teaching, learning and assessment;
- ▶ At the request of students;
- ▶ Upon proposal of the MoESCS.

As for specifying the changes made, they are as follows:

- ▶ Forms of individual research work and mode of student knowledge assessment;
- ▶ New criteria and requirements for final certification of students;
- ▶ Technical means and support for the online mode of learning and teaching.

The respondents provided the following answers concerning the challenges for the implementation of the codes of conduct and policies and procedures addressing corruption in education and education fraud due to the COVID-19:

- ▶ Lack of capacity and experience in the organisation of online courses and evaluation;
- ▶ Organisation of online examinations and controlling the cases of academic dishonesty and plagiarism during the examinations;
- ▶ Issues related to the recognition of online training passed by the staff;
- ▶ High demands required by online education and impacting the independence and self-discipline of the students.

Regarding successful experiences overcoming the challenges, HEIs provided the following answers:

- ▶ Development of online tools;
- ▶ Replacing written exams with oral ones;
- ▶ Conducting online examinations, during which student ticket selection is made online through roulette;
- ▶ The organisation of training on the use of ICT technologies in the educational process to increase computer literacy amongst staff;

- ▶ Surveying the development of a new code of conduct;
- ▶ The organisation of special individual stations, equipped with computers, earphones and microphones, for conducting online exams and ensuring all requirements are met;
- ▶ Studying and introducing the best practices of the leading universities of the country.

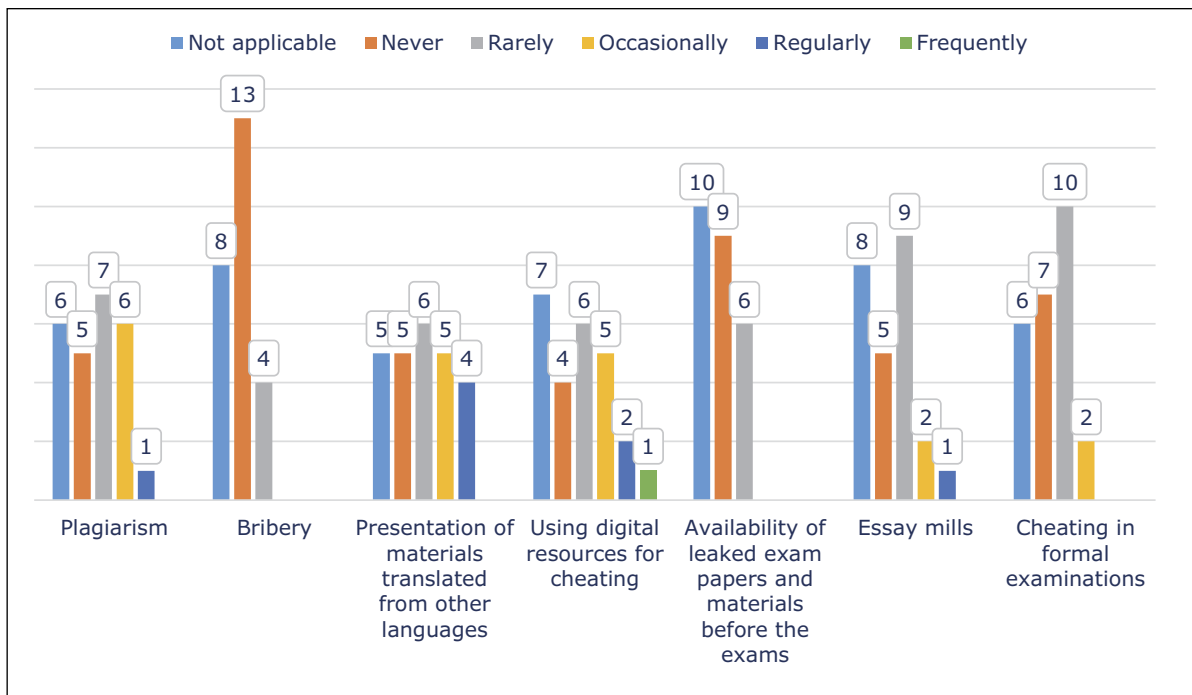
MOST FREQUENT FORMS OF EDUCATION FRAUD OBSERVED IN HEIs SINCE 2020: DETECTION MECHANISMS AND ADAPTATION TO COVID-19 PANDEMIC CHALLENGES

This section of the questionnaire observed the most frequently met forms of education fraud in HEIs since 2020 taking into account the impact of the pandemic. Moreover, it also focused on the availability of specific measures for detecting various forms of education fraud in HEIs, their adaptation in line with the COVID-19 pandemic and monitoring of the adapted measures.

Thus, *Figure 9* reflects the analysis of the responses concerning the frequency of the following forms of education fraud since 2020:

- ▶ Plagiarism;
- ▶ Bribery;
- ▶ The presentation of materials translated from other languages;
- ▶ Using digital resources for cheating;
- ▶ Availability of leaked exam papers and materials before the exams;
- ▶ Essay mills;
- ▶ Cheating in formal examinations.

Figure 12. Since 2020 how often have the following forms of education fraud been observed in your HEI?



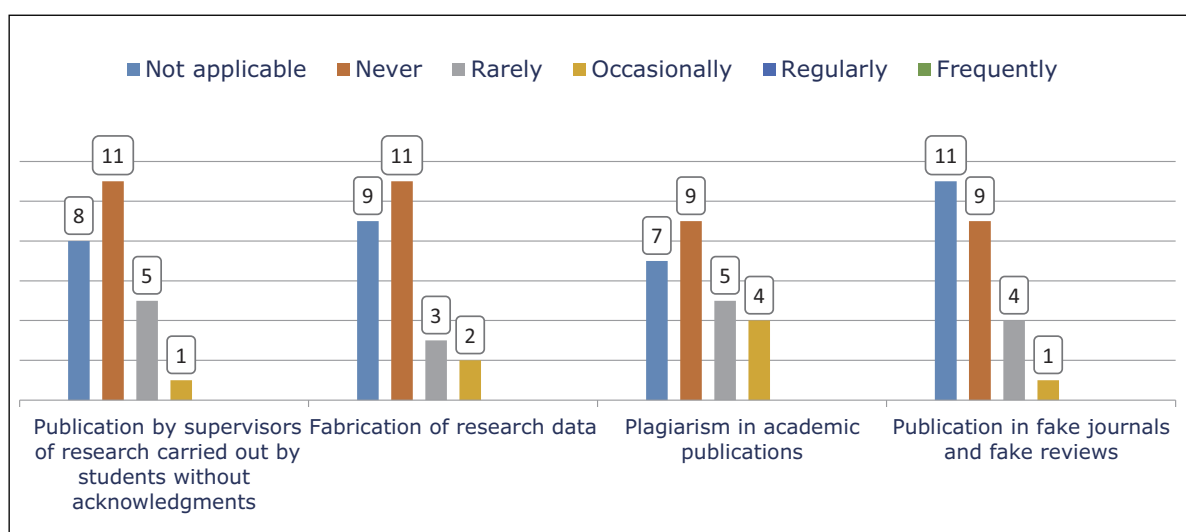
Thus, the analysis shows that since 2020 plagiarism has been observed **occasionally** and bribery has **never** been observed by most of the respondents. As for the presentation of materials translated from other languages, they are **rarely** used as indicated by the majority, while digital resources are used **regularly** for cheating. The leaked exam papers and materials are **regularly** available before the exams as stated by the majority of the respondents, and essay mills are **rarely** observed. The majority of HEIs indicated that cheating in formal examinations has also been **rarely** detected.

Moreover, this section of the questionnaire reflects the views of HEIs on the frequency of observing the following types of education fraud related to research and publication:

- ▶ Publication by supervisors of research carried out by students without acknowledgments;
- ▶ Fabrication of research data;
- ▶ Plagiarism in academic publications;
- ▶ Publication in fake journals and fake reviews.

As shown in *Figure 11* since 2020 publication by supervisors of research carried out by students without acknowledgments and the fabrication of research data have **never** been observed by the majority of the respondents. Regarding plagiarism in academic publications, the responses submitted by the participants show that it has **never** been observed by the majority of the respondents, while publications in fake journals and fake reviews have **regularly** been observed.

Figure 13. Since 2020 how often have the following forms of education fraud related to research and publication been observed in your HEI?



Concerning the specific measures for detecting various forms of education fraud in HEIs, the respondents indicate the following:

- ▶ Software to ensure the originality of the documents;
- ▶ Anti-plagiarism programmes used for graduation papers and Master’s theses;
- ▶ Regular inspections;
- ▶ Requirement for the students to sign on the title paper of their graduation and thesis papers to confirm that there is no plagiarism in their research and that they are aware they will not be allowed to defend it in case any plagiarism is detected;
- ▶ Digital storage for the academic staff and students which will contribute to the increase of the index of references to scientific works and scientific rating of the author;
- ▶ Anonymous hotline in the HEI;
- ▶ Regulation on academic honesty and integrity;
- ▶ Commission to review the complaints and make a relevant decision;
- ▶ Editorial council.

As for adapting measures for fraud detection in line with the COVID-19 pandemic, the majority of the responses stated that they have not been updated and adapted and processes are still being reviewed. The common measure indicated by the HEIs was the use of technology for the regular observance of online activities (teaching, exams, etc.). Moreover, based on the provision of evidence, monitoring of the adopted measures has not been carried out by the majority of the respondents, and only one of the HEIs indicated they have carried out a survey to contribute to the development of the code of conduct of the university and the other respondent stated that the process of monitoring will start in December 2021.

AWARENESS-RAISING ABOUT CORRUPTION RISKS AND EDUCATION FRAUD IN HEIs

The activities performed by the Republic of Armenia HEIs regarding raising awareness about corruption risks in education and forms of education fraud for HEI's academic and other staff, students and other beneficiaries were observed in this section of the questionnaire.

Based on the analysis of the responses provided by the HEIs, the following awareness-raising activities were performed:

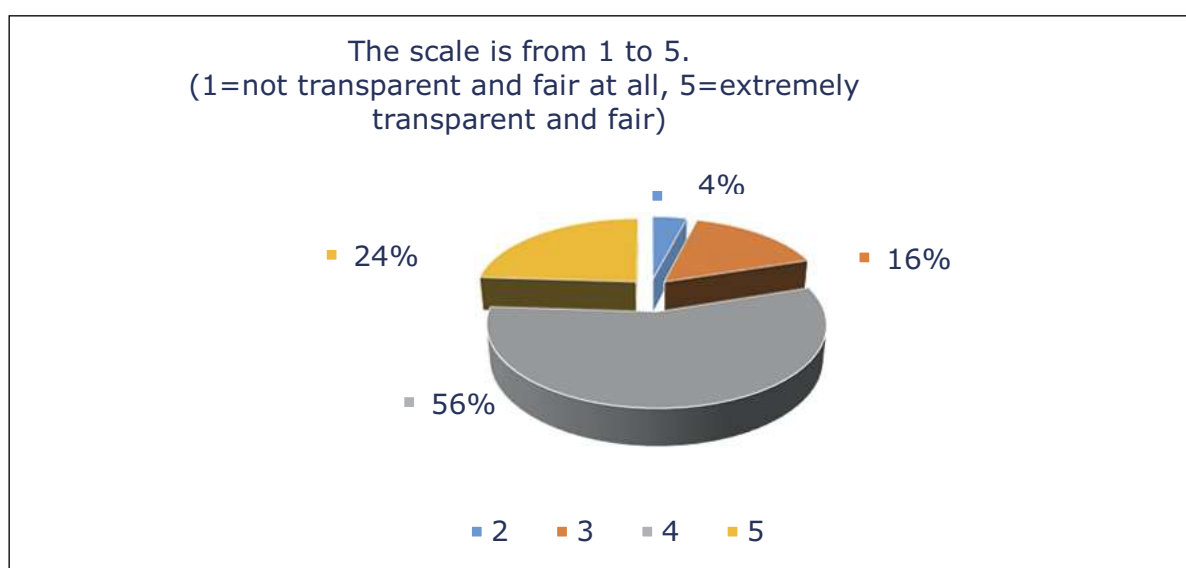
- ▶ Implementation of courses on anti-corruption policies and regulations to make changes in the value system, mentality and behaviour;
- ▶ Establishment of a testing centre and a system of supervision;
- ▶ Publication of the procedures for preventing academic dishonesty, rules of ethics on the HEI's website;
- ▶ Establishment of the Codes of Conduct;
- ▶ Surveys and workshops;
- ▶ Close work with the student councils with regular training;
- ▶ Consultations and roundtable discussions with academic and administrative staff as well as the students;
- ▶ Verbal presentation of the risks and distribution of ethics regulations;
- ▶ Reminders and warnings about the rules and regulations during orientation, graduation, exam periods.

REGULATION ON STUDENT SELECTION AND ADMISSION: RELEVANCE TO THE LISBON RECOGNITION CONVENTION AND CORRUPTION RISKS DUE TO THE COVID-19 PANDEMIC

This section of the questionnaire was developed to give an overview of HEIs concerning the transparency and fairness of the student selection and admission process in the Republic of Armenia (see *Figure 12*) as an area of potential corruption risks and various forms of fraud. The questions that follow intend to present the respondent's views on how the regulation on selection and admission of international students could be improved in line with the Lisbon Recognition Convention and the main risks of corruption due to the COVID-19 pandemic, surrounding the admission of international students.

The analysis of the responses shows that the majority of the respondents (56%) consider that the current student selection and admission process is transparent and fair and only 4% indicate that the process is somewhat transparent and fair.

Figure 14. How transparent and fair do you think is the current student selection and admission process in Armenia?



■ As for the HEIs observations on how the regulation on selection and admission of international students should be improved in line with the Lisbon Recognition Convention (LRC), the responses are as follows:

- ▶ The corresponding regulatory documents of the HEIs should be updated and adapted in compliance with the LRC.
- ▶ All the stakeholders should be well-informed about the LRC.
- ▶ Cooperation between HEIs, ArmEnic and MoESCS should be strengthened and diversified.
- ▶ Better communication with ArmENIC should be established regarding the clarification of admission criteria.
- ▶ HEIs should exercise autonomy in the selection and admission of international students.
- ▶ The recognition of learning outcomes should be ensured.
- ▶ The pandemic caused difficulties in the admissions of international students. The HEIs are guided by the regulations of the MoESCS. Legislative regulations are a priority.
- ▶ HEIs should admit applicants without entrance exams.
- ▶ Information about admission provided to the applicants should be accurate, precise and reliable.
- ▶ Less paperwork and bureaucracy with the governmental agencies and more focus on knowledge and expertise of the foreign applicants are needed.

■ Regarding the main corruption risks of admission of international students due to the COVID-19 pandemic, the majority of the respondents states that it is difficult for them to answer as no study has been performed to reveal the risks. As for the other responses, they are as follows:

- ▶ As the submission of documents is online, this can result in cases of false documents being submitted.
- ▶ Restriction, lockdowns and lack of pandemic-related provisions in the regulations increase the risk of corruption and education fraud.
- ▶ Online admission does not allow to fully reveal the knowledge of the applicant and can be risky.
- ▶ Universities with financial problems can ignore the preconditions for admission by falsifying the results of the entrance exams.

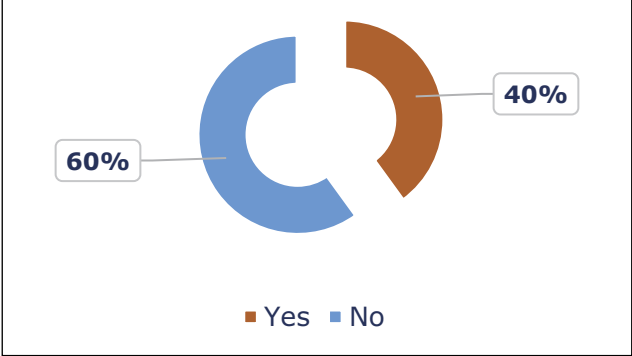
THE PROJECT “STRENGTHENING INTEGRITY AND COMBATING CORRUPTION IN HIGHER EDUCATION IN ARMENIA” AND THE USE OF TOOLKITS BY HEIs

■ The last section of the questionnaire was developed to present the situation regarding the awareness and usage of the toolkits developed in the framework of the project “Strengthening Integrity and Combating Corruption in Higher Education in Armenia”. The Project aimed at strengthening integrity and combating corruption in higher education institutions by supporting effective implementation of the Armenian Government’s Anti-Corruption Action Plan 2015-2018.

■ The Project objective was to support the development of prevention and integrity mechanisms for practicing professionals and to increase good governance in the field of higher education in Armenia.

■ *Figure 13* shows that 76% of the respondents are not familiar with the project. As for the use of the toolkits developed in the framework of the project, 2 out of 10 of the HEIs indicating that they are familiar with the toolkits stated that they use all 3 toolkits, as well as the Code of Practice For Ethical Conduct in Higher Educational Institutions, developed in the framework of the project, 1 HEI responded that they use 2 of the toolkits (A Code of Practice For Ethical Conduct in Higher Educational Institutions, Toolkit on Enhancing Accountability and Transparency in Curriculum Development and Student Assessment), while the others stated that the toolkits had served as the basis for the development of the corresponding frameworks in their HEIs.

Figure 15. Are you familiar with the project “Strengthening Integrity and Combating Corruption in Higher Education in Armenia”?



CONCLUDING OBSERVATIONS

■ The results of the survey were given on the responses of the 24 recognised HEIs. Generally, the response rate was not high, nevertheless, the largest HEIs in Armenia provided answers and enabled an analysis of the situation relating to academic integrity and various forms of fraud in a majority of the HEI's.

■ So far, the Education Development Strategy of the Ministry of Education, Science, Culture and Sports (MoESCS) has not considered an international expansion of Armenian education to other regions and countries of the world. Thus, the international operation is perceived by the Armenian HEIs only as attracting international students and various forms of international collaborations in education and research.

■ The majority of universities state that the problem of corruption and various forms of education fraud is not a major one. But according to the Anti-Corruption Strategy⁵⁸ for 2019-2022 of the Government of Armenia corruption remains "... a significant problem in critical areas of public administration, such as judiciary, tax and customs, health, **education**, military and law enforcement."

■ According to the study, corrupt practices and various forms of education fraud that are common in Armenia are due to a wide range of factors and some of them go back to the pre-1991 past. Moreover, it is evident that the codes of conduct and other existing regulations are not effective, which became apparent in the present pandemic situation. A number of suggestions were made by the HEIs to improve national and institutional regulations on fighting various forms of education and research fraud, as well as increase autonomy of HEIs and ensure equality of all types of universities, reconsider salaries of teaching and administrative staff, establish an independent body to monitor education fraud.

■ When analysing HEIs' responses regarding the present legal framework it is obvious that it does not fully address corruption and various forms of fraud, thus jeopardising proper implementation of the existing regulations. Also, it is not clear how the implementation of the regulations is assessed by oversight quality assurance mechanisms and processes. The 2004 Law on Higher and Postgraduate Education does not have provisions on academic integrity and codes of conduct. The majority (68%) of the HEIs that participated in the survey stated that they have institutional regulations addressing education corruption, academic and research fraud. Nevertheless, while studying the ethical codes of those universities it turned out that they were developed and adopted institutionally in 2017 and that no revisions were made afterwards. The COVID-19 pandemic situation was not reflected in the codes (with few exceptions (4 HEIs)). Only a few universities (13) reported on the existence of codes of conduct for administrative and support staff, students, academic staff and management.

■ From the very beginning of the health crisis, the objective of the MoESCS was to ensure the stability of the education process, as the introduction of restrictive measures at the beginning of the crisis resulted in the closure of all the educational institutions. However, the ministry and the institutions faced several challenges in the organisation of online teaching, developing new virtual forms and tools for student assessment, the recognition of online learning and others.

■ As reported by the HEIs the most frequently observed forms of education fraud are plagiarism, using digital resources for cheating, and the availability of leaked exams and materials before exams. Other types of education fraud are rarely or never observed. Additionally, it was reported that publications in fake journals and fake reviews are frequent practice, while the fabrication of research data, research carried out by students without acknowledgments, and plagiarism in academic publications have never been observed. Unfortunately, over the last few years a number of public scandals related to the plagiarism of scientific articles, using research data without referencing, as well as mass media articles indicate the opposite.

58. "Anti-Corruption Strategy of the Republic of Armenia," Ministry of Justice of the Republic of Armenia, Retrieved from: https://www.moj.am/storage/files/pages/pg_7105326429691_Anti-Corruption_Strategy_03.10.2019_ENG.pdf

■ According to the 2020 Corruption Perception Index (CPI) of Transparency International⁵⁹, Armenia has improved its position since 2012 in the ranking of the countries by their perceived levels of public sector corruption. However, the COVID-19 pandemic exposed ongoing governance and structural problems in the European countries, highlighting widespread corruption in the public sector including education. Transparency and accountability mechanisms need to be revised taking into account the pandemic crisis.

■ All the respondents reported on awareness-raising activities regarding corruption risks and education fraud. The activities comprise anti-corruption courses, publications, surveys and workshops, etc.

■ Part of the questionnaire reflected the views of the HEIs on student selection and admission, as well as on the recognition of qualifications. According to the answers provided, universities are generally satisfied by the way the student selection and admission is organised. Nevertheless, there is room for improvement in line with the Lisbon Recognition Convention (LRC): revision of national and institutional recognition procedures, strengthening cooperation between HEIs and ArmENIC, improving information provision, recognition based on learning outcomes, revision of admission regulations based on institutional autonomy.

■ Like the previous questions these answers contradict earlier information provided by the HEIs on admission rules in Armenia. In 2020 ArmENIC published the results of a study on the “Recognition of Foreign Qualifications and Short-term Studies/Credit Mobility Performed by the Higher Education Institutions of the Republic of Armenia” which analysed how the admission process is organised and whether the regulations comply with the principles of the LRC. According to the findings of the study, the MoESCS conducts ‘recognition of qualifications’ which in reality is just an examination and verification of the documents of foreigners for admission to a HEI in the RA. In this regards some concerns were brought up. Particularly, best international practice shows that the final decisions on the recognition of foreign qualifications for the purposes of further education are usually the responsibility of the HEIs, based on the fundamental principles of academic freedom and institutional autonomy. Undoubtedly, the HEI should be in direct contact with the applicant and have the right to make its own decision based on the advice provided by the National Information Centre. Such cooperation between a university and the National Information Centre ensures reliable and trustworthy decisions on recognition of foreign qualifications. Moreover, knowledge about the differences between national education systems is important in the field of recognition. Assessment and recognition of the foreign qualifications belonging to other national systems imply its comparison with similar national qualifications, for which it is necessary to take into account educational diversity and complexity. That is why the legislation of most European countries stipulates the mandatory requirement of a “comparability certificate” issued by the National Information Centre.

■ Thus, the Decision of the Government⁶⁰ of the Republic of Armenia on Admission Rules to Armenian HEIs for foreigners contradicts the principles of the LRC as well as the principles of academic freedom and institutional autonomy. The HEIs admit applicants “automatically” based on the decisions of the MoESCS. However, when it turns out that the HEI has conducted the admission process based on a wrong decision, it is not clear who is responsible for that. The LRC signifies the origin of qualifications, while the Decision of the Government of the Republic of Armenia is entirely based on the nationality of an applicant. Moreover, the MoESCS makes admission decisions limited to verifying the authenticity of foreign applicant’s documents and consular ratification. The recognition process is much broader in terms of both content and procedures and is based on learning outcomes. It is obscure how the MoESCS verifies the authenticity of the submitted educational documents.

■ The majority of the HEIs stated that due to the lack of studies revealing the COVID-19 pandemic risks it is rather complicated to assess its impact on the admission of foreign students. Nevertheless, the scarce data shows that the number of international students reduced very little compared to 2019.

■ The last section reported on the current situation regarding the awareness and use of the toolkits developed in the framework of the CoE/EU project “Strengthening Integrity and Combating Corruption in Higher Education in Armenia”. The project partner was MoESCS and its aim was to support the Armenian Government’s Anti-corruption policies in the education sector. Despite the very successful project, five years later and already only a few universities indicated that they were familiar with the instruments developed by the project though the majority of them have codes of conduct developed with the support of the project.

59. 2020 Corruption Perception Index(CPI) of Transparency International, Retrieved from: https://images.transparencycdn.org/images/CPI2020_Report_EN_0802-WEB-1_2021-02-08-103053.pdf

60. Decision of the Government of the Republic of Armenia N-700-U from 28.04.2011 <https://escs.am/am/news/4474> (in Armenian)

■ The Council of Europe maintains that academic integrity among its Member States is at risk. The threats that the Council of Europe believes are affecting academic integrity the most include (Council of Europe, 2021g, p. 3):

- ▶ Fast-paced technological developments
- ▶ The commercialisation of higher education
- ▶ The increasing power of Essay Mills
- ▶ Decreasing government funding towards education
- ▶ Government-related corruption, as well as “direct or indirect political pressure from public authorities” (Council of Europe, 2021g, p. 3).

■ Risks and threats will differ and exist to a varying extent amongst member states as evidenced by this study but the identification and prevention of academic misconduct in all its forms is a common endeavour.

■ Academic misconduct involves “any action or attempted action that breaches academic integrity and may result in an unfair academic advantage or disadvantage for any member of the academic community or wider society” (Tauginiene et al., 2017, p. 8, as cited in Ali, Sultan & Aboelmagedb, 2021, p. 372).

■ Recent circumstances around the Covid-19 pandemic have resulted in a significant move to online learning teaching and assessment. Academic misconduct can take place both in online and offline educational settings. A 2021 paper entitled ‘A Bibliometric Analysis of Academic Misconduct Research in Higher Education: Current Status and Future Research Opportunities’ reviewing relevant literature, observes that:

“Comparing online education with on-campus education, Gullifer and Tyson (2014) found that online students read more academic misconduct policies than on-campus and therefore commit less academic misconduct. Likewise, Peled et al. (2019) noted that online students have fewer cases of academic misconducts than face-to-face students. Conversely, Goff, Johnston, and Bouboulis (2020) reported more incidents of misconduct among online compared to on-campus students. Arnol (2016) also found that online education, particularly exam, show more incidents of misconducts than on-campus learning (Ali, Sultan & Aboelmagedb, 2021, p. 380).”

■ Tentatively this may suggest that institutions with a track record of online learning and assessment with established policies and procedures to support online delivery and assessment experience lower incidences of academic misconduct than those institutions who have made a rapid shift to online delivery and assessment and may not have been familiar with associated challenges. This study does not provide a definitive conclusion either way within the context of HEI’s in Armenia although the sharing of best practices between institutions as means of addressing challenges is to be encouraged as opposed to the issuing of directives to address concerns on an ad hoc basis.

■ This aligns with the approach of ETINED which is based on the idea that quality education will only be achieved, and corruption effectively addressed, if all relevant sectors of society commit fully to fundamental positive ethical principles for public and professional life, rather than relying only upon top-down mechanistic regulatory measures (Council of Europe, 2021b).

■ Accordingly, the Council of Europe (2021g) issued a call for submissions from HEI’s as part of a *Best Practice Programme in Promoting Academic Integrity*. This project seeks to “identify good practices in promoting [and] safeguarding academic integrity in light of the difficulties that have transpired since the beginning of the COVID-19 pandemic” (Council of Europe, 2021g, p. 4). The best practices are assessed on the basis of stakeholder participation, effectiveness, replicability, values and principles, efficiency, and sustainability (Council of Europe, 2021g, pp. 7-8). As part of that process multiple dimensions of HE decision making are considered as focus areas. These focus areas for the best practices will include (1) teaching and learning; (2) policy; (3) procedures; (4) communication; (5) governance and structures; and (6) training.

■ The first iteration of the project concluded in December 2021 and on the eve of International Anti-Corruption Day, the Council of Europe Education Department held an award ceremony for the identified best practices from 46 applications. The ceremony also served to raise awareness of the breadth of best practice across member states of the Council of Europe and disseminate knowledge of those practices. In furtherance of this aim the awarded practices will be published in a compilation of good practice and will also help to shape future policy development through ETINED.

■ The Director of Democratic Participation noted in his opening statement to the award ceremony that *“corruption in education erodes public trust in our institutions and, ultimately, democracy itself. Corruption should be fought through legal norms and structures, but it is not enough. We need a culture change, focusing on ethics and changing attitudes of all actors involved in education”*.

■ It is submitted that this study of education fraud in Armenia serves to support this aim of culture change with a focus on ethics and changing attitudes through recommendations that are considered next.

RECOMMENDATIONS

■ The problem of fraud and corruption in education is a crucial one and the consequences of neglecting to tackle it systematically, in a joint manner, are often very serious. This study has once again addressed the problem and its various forms. Moreover, the surveyed higher education institutions presented their views on what the corruption risks are related to the COVID-19 pandemic and whether the existing policies and procedures are effective in fighting fraud and corruption in education.

■ Contrary to the 2017 ArmENIC study on Fraud in International Higher Education the present study covers the Armenian education sector as a whole from secondary to higher education including a list of international providers. Challenges related to the recognition of the qualifications awarded by them have been presented. Moreover, the study has developed a chapter focused on existing international and European policies and practices in combating education fraud with a special emphasis on higher education. The student perspective has also been presented.

■ It is obvious that various forms of education fraud and corruption not only hinder access to all levels of education, but also affect the quality of education, the credibility of research results and challenge the recognition of Armenian qualifications internationally. However, for the development of effective anti-corruption policies and procedures in education it is necessary to identify the reasons for the endemic phenomenon which in most cases is beyond the academic environment. The need for broader solutions supported by the Government is extremely important.

■ According to the 2018 OECD monitoring report⁶¹ the anti-corruption reforms in Armenia had limited impact and corruption remained a significant problem in critical areas of public administration including the education sector. The new 2019-2022 Anti-corruption Strategy of the Republic of Armenia together with the Action plan approved by the Government of Armenia highlighted **anti-corruption education and awareness-raising** as one of three directions in fighting corruption. The importance of anti-corruption education from the earlier years of education as well as the need for the introduction of a compulsory subject in education of the middle-level professional and higher education programmes were emphasised. Nevertheless, the existing national and institutional policies and procedures are insufficient and non-effective in many ways which has become more visible during the present COVID-19 situation.

■ From a lack of transparency in admissions and examinations, in procurement processes, of nepotism in hiring of academic and administrative staff, to the buying and selling of academic titles and skewing of research results, major corruption risks can be identified at every level of the education and research systems. Even so, education is important for personal integrity and is a critical tool in fighting fraud and corruption effectively.

■ ETINED's recommended approach for implementing the principles regarding ethical standards in education is openness, integrity, participation and to focus not on results but on the process and priorities.

■ Honesty, Transparency and Trust are key principles identified by ETINED that support the credibility of educational institutions and which are also important in building strong counter-fraud systems to prevent academic misconduct.

■ More than ever there is a need to develop anti-corruption policies and procedures for the Armenian education sector with sound monitoring mechanisms. These will allow for a bottom-up approach targeting cases of unethical behaviour and the motives behind them. The education sector is of a special value to anti-corruption advocates thanks to its extended role in building more fair and responsive societies.

■ Accountability is a key ETINED principle that will ensure that information derived from sound monitoring mechanisms will be used to hold individuals, agencies and organisations responsible for executing their powers and duties properly. It is therefore recommended that in addition to monitoring mechanisms that any corrupt

61. Anti-Corruption Strategy of the Republic of Armenia. Ministry of Justice of the Republic of Armenia. <https://www.moj.am/en/page/583>

actions found must have clearly defined and transparent consequences for those involved. The principle of justice demands that those consequences are fairly and openly applied which will serve as a deterrent against future corrupt practices.

■ All stakeholders of education in Armenia should join their efforts to tackle the problem of education fraud and corruption. This reflects the ETINED principle of Trust in action. Moreover, these efforts must be an integral part in strengthening quality of education, rather than creating additional burden for higher education institutions. Quality assurance should include monitoring of institutional policies and procedures on the manifestation of academic dishonesty, not as an end in itself but as a commitment to the ETINED principles of quality education and to support personal and systems improvements within the context of the democratic involvement of all relevant actors and ethical management by leaders.

■ As the EHEA member country, Armenia committed⁶² "...to foster ethics, transparency and integrity in and through education and research. ... A robust culture of academic and scientific integrity that blocks all forms of academic fraud and distortion of scientific truth should be supported by all higher education institutions and public authorities." The Council of Europe's ETINED platform provides the possibility for European countries to reach this goal and demonstrates the purpose and value of international cooperation in support of member States.

■ MoESCS and higher education institutions should therefore follow the recommendations⁶³ made by the CoE/EU joint project "Strengthening Integrity and Combating Corruption in Higher Education in Armenia" (2015-17).

■ Moreover, there are challenges for professionals working with foreign qualifications related to the rapidly changing environment related to globalisation, diversification and digitalisation of education. The main concern for the authorities assessing foreign qualifications is to identify academic fraud from qualifications that have been awarded by unknown foreign education systems. Therefore, it is important that higher education institutions have trustworthy procedures for the recognition of foreign qualifications including strong authentication and verification procedures. Also, the staff dealing with foreign qualifications should undergo regular training on recognition procedures and practices as well as how to detect various forms of academic fraud.

■ Action should be evidence- as well as values-based as the absence of evidence is not evidence of absence.

■ Other recommendations made by the higher education institutions themselves include:

- ▶ Increase salaries and state funding of HEIs which will minimise the university's financial dependence on tuition fees;
- ▶ Increase the autonomy of universities and ensure the equality of public and private universities;
- ▶ Perform strict monitoring over the educational documents and create an integrated database;
- ▶ Raise the level of the general public's awareness about fraud and corruption in education;
- ▶ Establish an independent committee for inspecting education fraud.

62. EHEA (2020). *Rome Ministerial Communiqué*, Rome, 19 November 2020. Retrieved from http://www.ehea.info/Upload/Rome_Ministerial_Communique.pdf

63. Risk analysis of the issues affecting the integrity issues of the Armenian higher education system, CoE 2015 <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016803073f5>

APPENDIX 1

LIST OF ARMENIAN HIGHER EDUCATION INSTITUTIONS WHICH PARTICIPATED IN THE STUDY

1. Armenian National Agrarian University
2. Armenian State Institute of Physical Culture and Sport
3. Armenian State Pedagogical University after Khachatur Abovyan
4. Armenian State University of Economics
5. Brusov State University
6. Gavar State University
7. "Galick" University of Yerevan
8. Goris State University
9. Humanitarian Institute of Hrazdan
10. International Scientific-Educational Center of NAS RA
11. "Mardig" University of International Economic Relations
12. "MFB" Financial Academy
13. National Polytechnic University of Armenia
14. National University of Architecture and Construction of Armenia
15. Northern University
16. "Progress" University of Gyumri
17. Public Administration Academy of the Republic of Armenia
18. Shirak State University after M. Nalbandyan
19. University after Movses Khorenatsi
20. University of Traditional Medicine of Armenia
21. "Urartu" University of Practical Psychology and Sociology
22. Yerevan State Institute of Theatre and Cinematography
23. Yerevan State Medical University after M. Heratsi
24. Yerevan State University

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- Armenian Institute of Tourism. <http://www.ait.am/>
- Ayb Educational Foundation. <https://ayb.am/>
- BISA – British International School of Armenia. <https://bis.am/>
- Cambridge International School/CIS. <https://cisarmenia.com/>
- CITY College, University of York Europe Campus. https://york.citycollege.eu/frontend/index.php?chlang=AM_EN
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