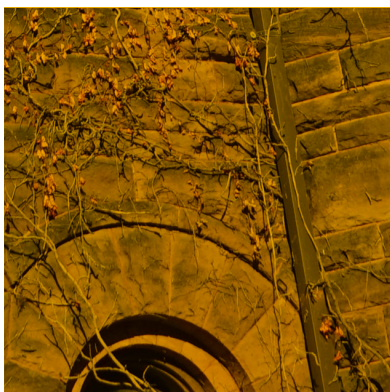
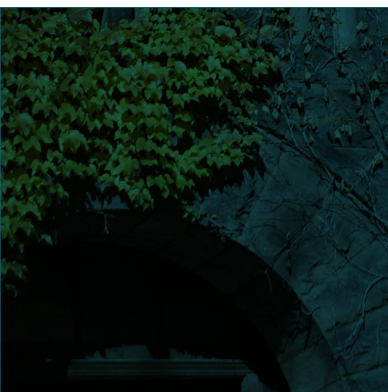
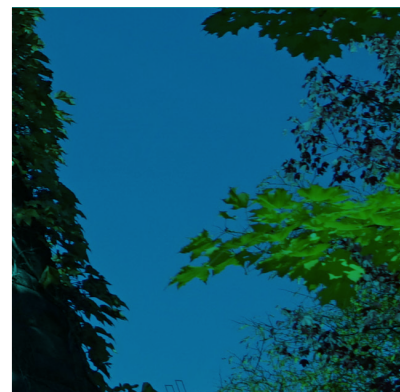
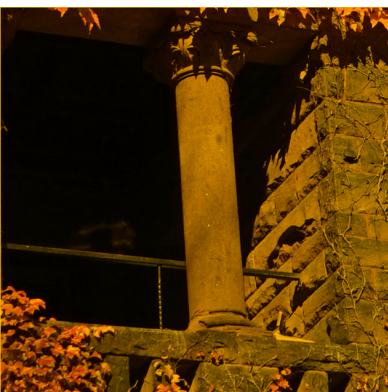


Policies and Actions of Accreditation and Quality Assurance Bodies to Counter Corruption in Higher Education



Executive Summary | February 2019

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E1. Overview

A global study conducted during 2017-18 for the Council for Higher Education Accreditation International Quality Group (CHEA/CIQG) builds on the Advisory Statement for Effective International Practice, Combatting Corruption and Enhancing Integrity: A Contemporary Challenge for the Quality and Credibility of Higher Education (Advisory Statement) by IIEP / UNESCO and CIQG (IIEP & CIQG 2016). This study captured information about actions and responses of accreditation and quality assurance bodies (AQABs) to address different forms of corruption in higher education.

Results, recommendations and conclusions based on the findings from the study are presented in the main report, targeting people interested in quality and standards and concerned with discouraging corruption in higher education. The findings are specifically addressed to organisations with responsibility for assuring quality and integrity of education or research, and those responsible for overseeing and funding their operation.

“Corruption” is a very broad term with many connotations and interpretations. We have adopted a rather narrower interpretation of the definition included in the Advisory Statement (IIEP & CIQG 2016: 1). Most examples of corruption in this study focus on intentional actions of individuals or groups rather than misconduct through accident, incompetence or ignorance.

Based on the 2016 *Advisory Statement*, the research focused on how AQABs are responding to corruption in different areas of higher education:

- the regulation of higher education systems
- the teaching role of higher education
- student admission and recruitment
- student assessment
- credentials and qualifications
- research and publications

Evidence collected during the study came from a literature review, an on-line questionnaire, semi-structured interviews and discussions. The analysis is based on 69 valid responses from AQABs and networks of AQABs and 22 more detailed contributions. Key points from the full report are briefly summarized here.

E2. Summary of findings

E2.1 General findings

The literature review (Appendix 5, main report) paints a convincing picture about the ubiquity and diversity of corruption in higher education, including unethical, inappropriate, sometimes illegal practices; the evidence suggests that in every part of the world higher education is affected by corruption to some extent. However, types and prevalence of corruption vary between locations.

AQABs in some countries (for example Russia, Nigeria, India, Western Balkans) tend to be more aware of specific types of corruption affecting higher education compared to AQABs serving more developed countries (for example compared to AQABs in Scandinavian countries).

In general AQABs have a range of sanctions they can apply to institutions to persuade them to address any evident corruption and malpractice. However, most methods adopted for evaluating institutions are unlikely to uncover evidence of corruption.

Thematic analysis of the qualitative data identified three further categories to add to the six on which the research was based: corruption in the governance of higher education institutions; networking and cooperation between AQABs and other bodies to address corruption; and considerations on different perceptions of integrity, quality and standards. The following summary is organized according to these nine categories, acknowledging overlaps and commonality between categories and themes.

E2.2 Corruption in the regulation of higher education

Despite the evidence about the existence of such types of corruption the majority of respondents (64%) expressed no concerns about corruption in the regulatory process. Some respondents said these types of corruption did not apply to their organization; some expressed confidence that existing measures, activities and methods of AQABs ensure corruption is kept under control.

AQABs in many Anglophone countries are involved in the study are pro-actively monitoring, supporting and engaging with HE providers and responding to identified threats to standards and quality.

Suggestions by respondents on what can be done to reduce corruption in the regulation of higher education include: transparency in all aspects, including appointment of officials and publication of reports; regulatory bodies respecting an integrity code; appointment of officials who have integrity and no conflicts of interest; reducing bureaucracy; introduction of an independent authority to receive complaints and appeals arising from the regulatory process; independence of AQABs from governmental influences; restructuring and regulation of the private HE sector; random or unannounced institutional visits to reduce opportunities for misleading audit panels.

E2.3 Corruption in the governance of higher education institutions

Examples of political interference, potentially threatening the autonomy of higher education institutions were found in several countries (Australia, Brazil, Hungary, Poland, Russia, Turkey and USA). Actions included interfering in institutional decisions, banning subjects from the curriculum, imprisoning academics who disagree with the prevailing politics and overriding research funding decisions.

With up to 1,200 affiliated colleges linked to a single university in India, internal QA monitoring processes are extremely complex. The flexible “system” appointments, whereby academic staff are allocated to institutions throughout India, can drive academics to bribery to secure a teaching post in a reputable or convenient institution.

University leaders and professors with fake or undeserved doctoral degrees are impacting on the governance of some universities in Russia. It is very difficult to challenge corruption in an institution if the rector has no respect for ethical practices. Even more damaging is when senior leaders lacking genuine academic qualifications are appointed to accreditation and attestation committees, with responsibility for monitoring and setting academic standards.

For every underserved degree conferred by HEI there are other people and systems complicit in approving the award. After a plagiarized thesis is discovered, in addition to the students, the supervisory team and people involved in internal and external processes for verifying and awarding the degree should also be held accountable.

Analysis of fully plagiarised doctoral dissertations from Russian universities revealed that the same “scientific advisors” were involved in supporting 20, 30, even as many as 50 other plagiarized dissertations.

Examples of financial mismanagement involved a Russian university rector charged with abuse of authority after financial irregularities in 2016 and a UK university found in 2017 to be ignoring conflicts of interest and lacking transparency when agreeing senior staff remuneration.

The problem of “in-breeding”, whereby institutions tend to favor their own graduates, rather than appointing applicants from elsewhere, was noted in responses from Western Balkan countries and in Russia.

Although AQABs do not have the authority to address every type of corruption in HE governance, they do have the potential for helping to reduce these forms of corruption by pro-actively following up on evidence that arises and either highlighting the need for action by other bodies that are responsible, or applying sanctions for matters within their remit.

E2.4 Perceptions of integrity, quality and standards within higher education

There are no global HE benchmarks or standards for HE; even where international standards exist (for example in Europe, 1999 Bologna Declaration that led to the Bologna Process), there is no consistency in how HE standards are applied in practice.

Inconsistency in standards within one country can result from a strong culture of autonomy and lack of robust internal and external quality assurance, for example higher education providers in India, Russia and Germany. In India a range of post-graduation tests are routinely used for gaining entry to different professions, rather than relying on university awarded qualifications.

Gender discrimination is still problematic in some countries, for example a decision was taken several years ago by officials at a Japanese university, to routinely adjust examination results to ensure that no more than 30% of medical graduates were female.

AQABs should be open about differences (strengths and weaknesses) in cultural norms and educational standards they encounter in different institutions and parts of the world. An emphasis on quality enhancement, rather than checking for compliance with a check list of policies, is more likely to encourage dialogue with institutions about corruption and how to address it.

E2.5 Corruption in the teaching role

Less than one third of questionnaire respondents expressed any concerns about corruption in the teaching role (representing the Americas, Asia-Pacific, Europe, Middle East, Africa and international). Corruption in recruitment and promotion of academic staff and Absenteeism of professors and teachers each had 6 responses with serious or major concerns.

Many forms of corruption connected with teaching can be side-effects from initiatives such as: massification of higher education; efforts to boost the institution's standing or reputation in rankings (including pressure to publish); financial pressures to maximize student progression; completion rates and casual teaching appointments requiring mobility and flexibility by academics.

Poor remuneration and job insecurity, often through lack of tenured positions, can force academics to assemble a portfolio of casual short-term posts in different institutions (for example in Kosovo,¹ Lithuania). The precarious nature of such employment can also lead to more susceptibility for accepting or demanding bribes, for example in return for favorable student grades.

The widespread phenomenon of “ghost advising” or absenteeism by senior academics, often delegating their responsibilities for teaching and supervision to junior colleagues or research students is unfair to students and the institution. In Kosovo this practice occurs frequently because of shortages of professorial level academic subject experts and an unworkable regulatory framework for higher education that is not mindful of demographic limitations.

Bullying, harassment and sexual harassment (staff and students) featured in questionnaire responses and literature. Examples include teachers demanding sexual favors from students in return for preferential grades (in many places) and students and teachers sexually harassing, threatening or physically harming academic teaching staff (Uganda).

Although some of these examples have deep-rooted causes, there is an important role for AQABs in discouraging corruption in the teaching role. It may be difficult to identify such problems from self-assessment evidence provided in advance and during visits, but providing guidance notes on this topic (as TEQSA, Australia) and encouraging open dialogue in academic communities, can help strengthen institutional responses.

¹ All references to Kosovo, whether the territory, institutions or population, in this text shall be understood in full compliance with United Nations Security Council Resolution 1244 and without prejudice to the status of Kosovo.

E2.6 Corruption in admissions and recruitment

Less than half the questionnaire respondents expressed concerns about corrupt practices in higher education admissions and recruitment. The most concerns (24/69 responses) were expressed about *misleading advertising and recruitment*, followed by *falsified transcripts / fake recommendation letters* (21/69) and *cheating in admissions tests* (18/69).

Cases of complicity from university officials in admission decisions involving favouritism were reported in Japan and Slovakia.

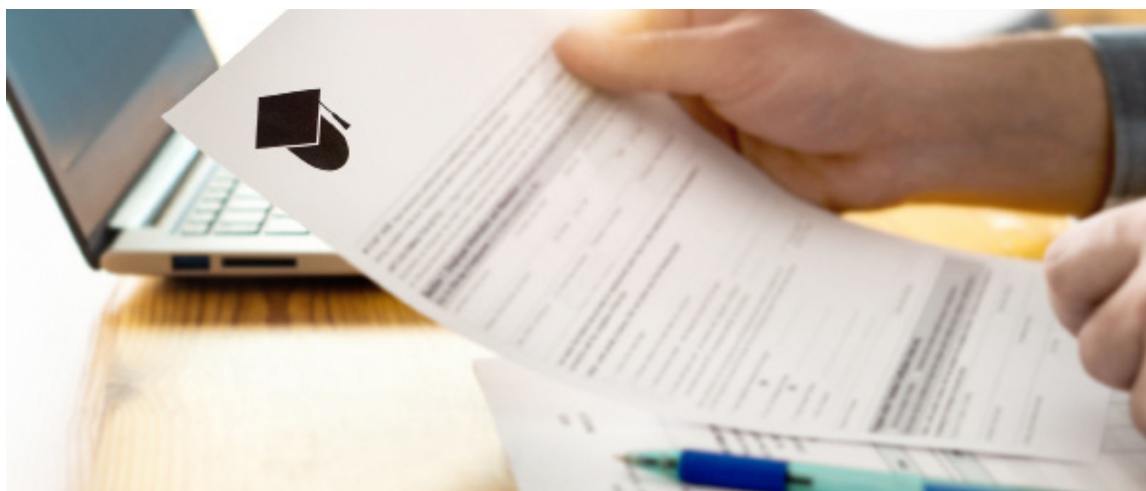
Some highly organised and systematic corruption was exposed by a number of investigative journalists working in UK, Australia, Canada and USA; corrupt activities included generation by agents of falsified qualifications to secure HE admissions and student visas; preferential admissions based on bribery, political connections or nepotism; admitting talented sports stars for membership of varsity teams without the necessary academic qualifications; using impersonators to take English language tests.

Identifying reputable HE institutions can be a minefield for people not familiar with the HE landscape, particularly where fake institutions are designed to look very similar to reputable universities. “White lists” and “black lists” of institutions are available to guide applicants and their families in making informed decisions. Use of available guidance on identifying discredited or bogus universities can also help with this process.

Underqualified students, either in terms of language skills or subject knowledge, will struggle to progress, may feel very vulnerable and, without adequate support, may be driven to cheating just to get by. Corruption in admissions and recruitment is therefore an important quality and standards issue that AQABs need to consider in their operations.

Different solutions to reduce corruption in admissions and recruitment include a centralized clearing system for all undergraduate applications to university (for example UK, Lithuania) and a national university entrance examination (China, Russia). In Australia problems with schools falsifying and inflating statistics are hampering widening participation efforts, leading to calls for more effective self-regulation. Many AQABs and HE institutions work through other organisations such as ENIC-NARIC to verify academic qualifications of incoming students.

Given that irregularities in admissions and recruitment are unlikely to be uncovered in the course of routine AQAB activities, a pro-active sector-wide campaign for good practice in admissions may help to highlight these problems and lead to less corruption.



E2.7 Corruption in student assessment

Student assessment is often the main focus of accreditation and quality assurance bodies, as a measure of quality and standards and implementation of institutional policies. The most concerns in the questionnaire response (25/69) were about *plagiarism and cheating in continuous assessment*. The second highest response was for *cheating in formal examinations*, (22/69), with 19/69 respondents registering concerns about *contract cheating / essay mills / ghost-writers*.

Student cheating can be considered to be corruption where there is complicity by teachers and academics in the process, such as demanding or accepting bribes, favors or ignoring or encouraging cheating, leaking examination questions and answers in advance and generally providing unfair assistance to help students to complete and pass examinations. Few people would dispute that where there is serious intent to deceive by a student, fraudulent behavior, such as students using a third party to complete a written assessment or using an impersonator to sit their examination, is a form of corruption. Examples of these types of behavior were found in many countries.

Actions taken by AQABs, governments and institutions against the corrupt practice affecting reliability of assessment include: supporting the development or purchase of software for aiding the detection of plagiarism (UK, Slovakia, Slovenia); creating guidance for the sector (UK, Australia); creating new legislation to make contract cheating companies and advertising their services illegal (New Zealand, Ireland); using existing legislation to prosecute fraudulent conduct (USA, New Zealand) or challenging misleading advertising (UK); providing support and funding for research to address academic misconduct and encourage academic integrity (very many examples globally).

In questionnaire feedback, an AQAB operating in South-East Europe explained that “*cheating is seen as culturally acceptable, however, institutions are taking strong measures to combat it. ... Inconsistencies in grading are a major concern and a topic in the next accreditation cycle as institutions need to introduce mechanisms to improve consistency of grading*”. The same respondent added that bribery in student assessment had been tackled through police actions, which appeared to have been effective.

Examples from questionnaire respondents on what polices and regulations the institutions they accredit must have in place are: *security of examinations, handling plagiarism and fraud and ensuring fairness and justice*. Several AQABs expressed confidence that the incidences of cheating were low and the accredited institutions were managing the situation well.

It is difficult to be sure how much corruption and malpractice in student assessment is ignored or not identified. Many factors, such as differences about acceptable conduct, complacency within the institution (systemically or by individual academics), personal priorities and institutional policies, will all impact on whether suspicions of corruption are highlighted and what action is taken. Reflections from survey participants suggest that if institutions think they have no problems with student cheating (particularly contract cheating) then they may need to look harder.

The types of deliberate student cheating can evolve quite rapidly with advances to technology and communications. AQABs need to stay abreast of emerging threats, such as contract cheating and use of technological aids for examination cheating, and learn from research into possible solutions, to advise institutions about discouraging such conduct and counter-measures they can adopt.

E2.8 Corruption in credentials and qualifications

Questions on credentials and qualifications were answered by 40/69 questionnaire respondents, which was the second highest response rate from the six categories. The most concern was expressed about degree mills and accreditation mills (23/69), with 22/69 responses for falsification of transcripts and degree certificates and false statements about qualifications on CVs and job applications attracting concerns from 21 respondents. Very few respondents expressed concerns about political pressures from public figures to award academic degrees.

Accreditation mills or unregistered accreditation bodies, often invented or supported by fake institutions, are used to add credibility to low quality institutional profiles and deceive potential students about the authenticity and quality of an unaccredited HE provider.

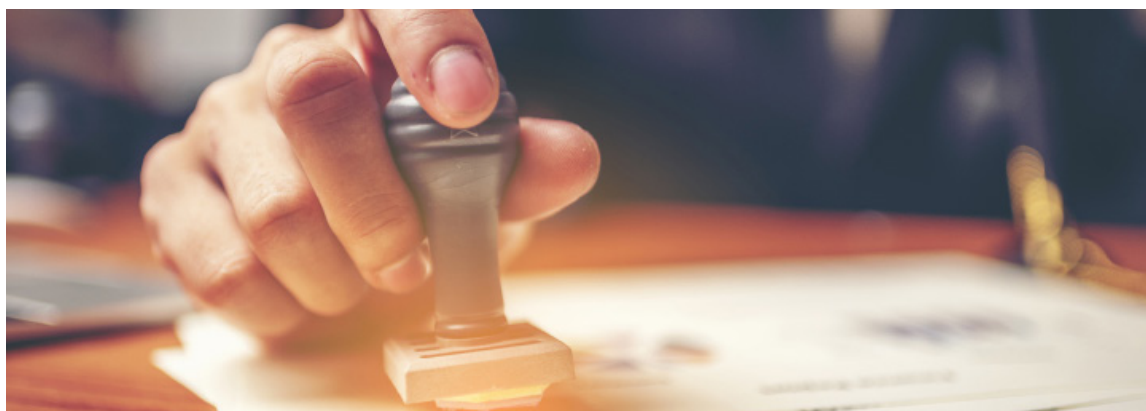
A technological solution is emerging to address the global problem of false credentials and qualifications, many generated by “diploma mills” and bogus universities. The Groningen Declaration Network (GDN) is a rapidly growing international network of organizations, many supported by national governments, each offering a service to verify academic qualifications. GDN members are increasingly forming partnerships with other members to extend the range of qualifications they are able to verify.

Digital verification will not detect unearned qualifications and degrees that have been conferred fraudulently or negligently by genuine universities. Detecting and discouraging this form of corruption still requires vigilance through robust internal and external quality assurance. This form of corruption can be particularly harmful when people with degrees they did not deserve find themselves in responsible roles, perhaps in medicine, education or engineering professions.

As a result of considerable efforts by groups of volunteers and investigative journalists, some underserved and fake degrees have been identified, for example: revocation of master’s and doctoral degrees awarded to many people, including PhD awards to medics in Germany; many examples of the use of the Pakistan-based diploma mill Axact in USA, Canada and UK; unjustified awarding of degrees by public universities in Russia, with over 8,200 fully plagiarised dissertations found so far; a coalition of anti-corruption bodies has joined forces to fight corruption in higher education in Kosovo.

The efforts of many of these volunteers are starting to bear fruit, as evidenced through increased awareness of the seriousness of the issues uncovered, through press and media reports about their activities. Views from the more prominent members of these groups are slowly beginning to feed into national or regional decision-making and influencing public policy, institutional practices and individual conduct.

AQABs should help to promote widespread use of secure digital verification services to counter use of fraudulent and worthless credentials in education, commerce and industry.



E2.9 Corruption in research and academic publishing

This section of the questionnaire had the lowest response rate of the six categories, with 18/69 active respondents. Very few questionnaire respondents said research (7/69) and academic publishing (3/69) were of central importance to their organization. In many countries other organizations (not part of the target audience for this research) are responsible for oversight of academic research.

Of the six examples of corruption in the questionnaire the most concern (11/69) was expressed for *plagiarism in academic publications*. *Translation plagiarism in manuscripts and supervisors publishing work conducted by students* were both of concern to 9/69 respondents and *fabrication of data or results* was of concern to 8 respondents. The remaining 2 examples, *peer reviewers suppressing work by rival researchers* and *commercial interference in suppressing inconvenient results*, each attracted 3 expressions of concern. The questionnaire responses could be interpreted to suggest that all is well in research and academic publishing, but other evidence paints a very different picture.

Sanctions and restrictions were applied to Duke University in 2015 by the US National Institute of Health (NIH) in response to financial irregularities and inappropriate management of several research projects, including cancer research to discourage further malpractice.

National governments of UK, China and Sweden have each recently initiated measures to strengthen research ethics and address misconduct and corruption in research and academic publication. The UK's concordat built on important international influences including the Singapore Statement and the European Code of Conduct for Research Integrity.

In USA the Office of Research Integrity (ORI) has responsibility for some of the research in public health across the USA. In addition to supporting institutional cases of research misconduct and national oversight, the ORI provides openly accessible "case summaries" for research misconduct.

Organizations such as Retraction Watch, PubPeer and the Committee on Publication Ethics (COPE) play vital global roles in highlighting problems, providing and leadership in setting standards.

Retractions can occur through the discovery of questionable research practices (QRP), skewing of research to suit the funding body, inability to replicate results or fabrication, falsification and plagiarism (FFP) in research. Sometimes genuine mistakes, such as misinterpretation or errors in calculations, can be discovered after publication, in which case the authors can request a retraction of the paper. Ethical reasons for retraction should be encouraged by removing the stigma and negative connotations associated with retraction, to ensure honest mistakes are corrected. Delays in confirming retractions, or not publicly highlighting them, can mislead and endanger other research.

Publishing in disreputable or "predatory" journals (with weak or absent peer review) should be discouraged, but it is sometimes difficult for would be authors and readers to discriminate between reputable and disreputable journals and associated research. The predatory publishing industry exists because there is a strong demand for such services.

Even if oversight of research and academic publishing is not central to the work of an AQAB, it can be argued that conduct in these activities is indicative of the wider culture of integrity in the institution. AQABs have a part to play, either directly or by working with other bodies.

E2.10 Networking to counter corruption in higher education

Most AQABs say they routinely collaborate with a range of other agencies and organizations at local, national and international levels in the conduct of their activities to counter corruption, reflecting the global nature of many forms of corruption, for example: receiving evidence from ombudspersons, other government agencies, the higher education community, non-government agencies and other parties interested in addressing corruption.

Journalists can be very useful contributors to AQABs and their partner organizations, to help to investigate and disseminate information about threats to integrity or new strategies.

Individuals and organized groups of volunteers in some countries are actively campaigning against corruption in higher education, academic research and publication; these people are trying to drive changes, with considerable success. It is important that AQABs work with organizations, NGOs and journalists that share concerns about quality and standards in education and research.



E3. Recommendations

As this study focuses on the actions taken by AQABs, the recommendations are addressed to them.

Recommendations for accreditation and quality assurance bodies:

1. Review terms of reference and standards in the light of the findings in this report and, if necessary, negotiate changes and further resources to more effectively address corruption and malpractice in higher education.
2. Make explicit the commitment to reducing corruption.
3. Ensure scrupulousness about transparency, accountability and integrity in every aspect of various activities.
4. Remain vigilant and be prepared to challenge HE providers about any corrupt practices that may undermine quality or standards.
5. Pro-actively monitor and respond to suspicions of misconduct and corruption in any part of the operation and any responsibilities.
6. Arrange site visits at short notice to counter potential “gaming” of the process of QA or accreditation by HEIs.
7. Provide support for developing educational and research quality and standards and helping HE providers to address corruption as a central to the role of all AQABs.
8. Regularly engage with and draw upon expertise within the HE sector to explore ways to discourage corruption.
9. Network, locally and internationally, with other organizations concerned with quality and standards as a means of sharing effective practices for fighting corruption.
10. Take a leadership role in advocating legislation to counter threats from diploma mills and accreditation mills as well as contract cheating companies.
11. Undertake research and consult with members of the HE community, including students, to inform and enhance policies and practices for addressing corruption and misconduct in education and research.

E4. Conclusions

The evidence generated in this study helps to inform AQABs about the current situation on corruption in higher education globally; results feed into commentary on good practice and suggest early warning indicators that can signal when QA standards in higher education and research are compromised.

The findings from this report also have implications for all other players in the higher education community in fighting corruption. In particular governments and professional bodies that establish AQABs and provide resources for them to operate have responsibility for ensuring they have sufficient support and funding to discharge their responsibilities as recommended.

Ultimately committees, panels and institutions are about collective and personal responsibilities of the individuals that represent them. Every individual member of the higher educational community throughout the world, including members of government departments, accreditation panelists, institutional leaders, but also researchers, academics, clerical officers and students, all must play a part in upholding integrity and standards in higher education globally.

The conversations with participants during this study have served to highlight opportunities for AQABs to influence and enhance the effectiveness of policies that impact on different forms of corruption.

Reference

IIEP, CIQG (2016). Advisory Statement for Effective International Practice Combatting Corruption and Enhancing Integrity: A Contemporary Challenge for the Quality and Credibility of Higher Education. IIEP/ UNESCO and CHEA / CIQG. <http://unesdoc.unesco.org/images/0024/002494/249460E.pdf> [accessed 4th November 2018].

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Appendix 1: List of Acronyms

AACRAO	American Association of Collegiate Registrars and Admissions Officers	EUS	European Union of Students	NHEQF	National Higher Education Qualifications Framework - India
ALLEA	All European Academies	GDN	Groningen Declaration Network - organizations offering digital credential verification services	NIH	National Institute of Health
AQAB	Accreditation and Quality Assurance Body	GUNI	Global University Network for Innovation	NZQA	New Zealand Qualifications Authority
AQA NZ	Academic Quality Agency for New Zealand	HE	Higher Education	OECD	Organisations for Economic and Cultural development
CDSL	Central Depository Services Limited - Depository based in Mumbai	HECSU	HE Careers Service Unit - UK organization responsible for HEDD	OfS	Office for Students - UK - founded 2018
CHEA	Council for Higher Education Accreditation	HEDD	Higher Education Degree Datacheck - UK digital qualification verification service	ORCA	Organizata për Rritjen e Cilësisë në Arsim - Citizens Corps - Higher education watchdog in Kosovo
CHESICC	China Higher Education Student Information and Career Centre	HEFCE	Higher Education Funding Council for England - Now superseded by the Office for Students	ORI	Office of Research Integrity - USA
CIQG	CHEA International Quality Group	HEI	Higher Education Institution	QA	Quality Assurance
CoE	Council of Europe	ICAI	International Centre for Academic Integrity	QAA	Quality Assurance Agency - England
COPE	Committee on Publication Ethics	IIEP	International Institute for Educational Planning - Part of UNESCO	QQI	Quality and Qualifications Ireland
DOI	Digital Object Identifier	KAA	Kosovo Accreditation Agency	QRP	Questionable Research Practices
EGE	Unified State Examination in the Russian Federation	KITU	Coalition for integrity and transparency at the University in Kosovo	TESQA	Tertiary Education Standards and Quality Assurance Australia
ENAE	European Network for Accreditation of Engineering Education	MEXT	Ministry of Education, Culture, Sports, Science and Technology in Japan	TI	Transparency International
ENIC	European Network of Information Centres in the European Region - also see NARIC	My eQuals	Digital credential system for higher education qualifications in Australia and New Zealand	TOEFL	Test for English as a foreign language
ENQA	European Association for Quality Assurance in Higher Education	NARIC	National Academic Recognition Information Centres in the European Union - also see ENIC	UKRI	United Kingdom Research and Innovation
EQAR	European Quality Assurance Register	NDML	NSDL Database Management Limited - National Academic Depository for India	UNESCO	United Nations Educational, Scientific and Cultural Organization
ETICO	IIEP-UNESCO - resources for education, ethics, transparency and combatting corruption globally	NGO	Non-Governmental Organization	WCRI	World Conference on Research Integrity
ETINED	Resources for education, ethics, transparency and combatting corruption in Council of Europe countries			WHED	World Higher Education Database - Information on HE institutions, systems and credentials