



— POLICY PAPER

Academic Integrity and Quality Assurance in the age of **Artificial Intelligence**

How Quality Assurance Agencies Monitor Academic Integrity: Evidence, Challenges, and Recommendations for ARACIS and INQAAHE

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Executive Summary

This policy paper was commissioned by the Romanian Agency for Quality Assurance in Higher Education ('ARACIS') and developed within the framework of the project "Academic Ethical and Integrity Conduct Supported by QAAs", co-financed by INQAAHE, to assess how quality assurance agencies ('QA agencies') globally monitor and support academic integrity, with particular focus on the challenges posed by generative artificial intelligence ('GenAI').

The paper was developed in the context of an increased dynamism in the higher education sector in relation to the deployment of and change by and through artificial intelligence ('AI'). While a lot of attention has focused on the ethical implications of the use of AI in higher education, a second strain of activity, scholarship and policy is focusing on how artificial intelligence is shaping the learning-teaching-assessment process itself and, implicitly, its quality. Particularly in the case of student assessment, artificial intelligence has been a disruptive factor calling for reconsidering how the achievement of learning outcomes is fostered, assessed and validated, ultimately placing the question of whether learning outcomes are genuinely being achieved at the center of the quality assurance debate.

Academic integrity intersects with, and extends beyond, several adjacent policy areas, including student assessment and ethical conduct. While protecting, promoting and enhancing academic integrity through quality assurance had been a practice in many countries and quality assurance agencies before GenAI, the deployment of AI tools can prove impactful in both quantitative and qualitative terms: firstly, by increasing the number of quality assurance agencies looking into academic integrity in general, particularly through their quality standards, and, secondly, through its holistic understanding. However, as it shows, it may also have had the indirect and unintended consequence of refocusing the discussion on academic integrity narrowly on plagiarism.

The objective of the study is threefold: i) to understand how QA agencies from INQAAHE membership currently assess academic integrity, through systematic analysis of 46 agencies across 40 countries, mapping the extent, type, and maturity of their academic integrity provisions, ii) to analyse the impact of generative AI on academic integrity and QA practice and iii) to provide suggestions on strengthening accreditation standards, sector communication, and inter-agency cooperation mechanisms, and identifying broader implications for INQAAHE's global membership.

The paper draws on systematic analysis of 46 QA agencies across 40 countries, all INQAAHE members, as well as 18 national and European policy instruments, and 43 published sources.

The central empirical finding is that 76% of QA agencies have some provisions on academic integrity, while only 7 of 46 agencies (15.2%) have explicit AI-specific provisions in formal accreditation standards. Almost 90% of the global QA agency sample analysed in the study operates with integrity frameworks designed before the public availability of generative AI tools.

The paper demonstrates that generative AI is categorically different from preceding integrity threats - in its accessibility (zero cost, browser-based), difficulty or arguably even invisibility to plagiarism detection infrastructure, quality of output, and interactive character. Beyond straining existing frameworks, it can provide or reinforce detection-centric responses, still a prevalent paradigm in many countries in contrast with the more contemporary prevention-based paradigm. The structurally sound response should thus be assessment redesign that restores validity by requiring authentic, process-oriented engagement.

Among several agencies, particularly in Anglophone countries (UK, Ireland, Australia, New Zealand) we noted a consistent pattern of effective practice through a strategic approach of networking, guidance, support and legislative advocacy beyond external quality assurance standards. While they were the first to move into strengthening the coverage of academic integrity after GenAI, others also moved quickly (e.g. Estonia, Malaysia).

The paper proposes a three-tier reform agenda: i) immediate actions (sector alert, AI detection guidance, RAIN planning, baseline data collection), ii) short-term actions (standard revision, evaluator training, assessment design criteria, RAIN launch), iii) and medium-term systemic reforms (contract cheating legislation, CAI framework expansion, annual misconduct data publication).

For INQAAHE, six implications and suggestions could be considered: updating the ISGs to reinstate explicit academic integrity provisions; maintaining the Toolkit as a living AI-era resource; establishing an open guidance library for member agency adaptation; commissioning biennial global surveys of provision; facilitating a global community of practice; and publicly endorsing the principle that all member agencies should address academic integrity in the AI era.

Key Statistics

- 46 QA agencies across 40 countries systematically analysed
- 35/46 (76%) have some academic integrity provision
- 7/46 (15%) have AI-specific provisions in formal accreditation standards
- 6/46 (13%) reference academic integrity implicitly by embedding student assessment integrity

List of Abbreviations

AI Artificial Intelligence

AIInt Academic Integrity

ARACIS Romanian Agency for Quality Assurance in Higher Education (Agenția Română de Asigurare a Calității în Învățământul Superior)

BFUG Bologna Follow-Up Group

CAI Comprehensive Academic Integrity

CHEA Council for Higher Education Accreditation

CIQG CHEA International Quality Group

EHEA European Higher Education Area

ENQA European Association for Quality Assurance in Higher Education

EQAR European Quality Assurance Register for Higher Education

ESG Standards and Guidelines for Quality Assurance in the European Higher Education Area

GenAI Generative Artificial Intelligence

HAKA Estonian Quality Agency for Higher and Vocational Education

HEI Higher Education Institution

ICAI International Center for Academic Integrity

INQAAHE International Network for Quality Assurance Agencies in Higher Education

IPPHEAE Impact of Policy Processes in Higher Education Academic Integrity in Europe

ISG INQAAHE Standards of Good Practice (formerly Guidelines of Good Practice)

JUAA Japan University Accreditation Association

LLM Large Language Model

NAIN National Academic Integrity Network (Ireland)

NCQAA National Commission for Academic Accreditation and Assessment (Qatar)

NZQA New Zealand Qualifications Authority

PEQAB Postsecondary Education Quality Assessment Board (Canada)

QA Quality Assurance

QAA Quality Assurance Agency for Higher Education (United Kingdom)

QQI Quality and Qualifications Ireland

RAIN Romanian Academic Integrity Network (proposed)

TEQSA Tertiary Education Quality and Standards Agency (Australia)

MQA Malaysian Qualifications Agency

OAQA Oman Academic Accreditation and Assessment Authority

Section 1: Introduction

1.1 Background and context

Higher education is undergoing a period of structural transformation with few historical precedents. Over the course of the past three decades, the sector has expanded dramatically in scale, diversified its modes of delivery, internationalised its student and staff populations, and increasingly relied on digital infrastructure to mediate teaching, learning, and assessment. These changes have produced significant benefits: broader access to knowledge, increased quality of education, more flexible pathways for learners, and richer opportunities for research collaboration across borders. They have also generated risks, among which the potential for academic integrity to be undermined in digitally mediated environments.

Academic integrity has been recognised as a fundamental value of higher education in the EHEA since the 2015 Yerevan Communiqué. The value received a formal, ministerial-level definition for the first time in the European Higher Education Area in 2024, through the Statement on Fundamental Values adopted at the Tirana Ministerial Conference (EHEA, 2024), which defined academic integrity as ‘a set of behaviours and attitudes in the academic community internalising and furthering compliance with ethical and professional principles and standards in learning, teaching, research, governance, outreach and any other tasks related to the missions of higher education.’ It has also been recognised as foundational to the credibility and social value of higher education. As Bretag (2016) observed in the landmark first edition of the Handbook of Academic Integrity, there can be no debate that academic integrity is fundamental to teaching, learning, research, and the advance of knowledge.’ That assessment remains valid today, and has arguably become more urgent as the conditions for maintaining integrity have been progressively complicated by technological, commercial, and cultural pressures.

The period from 2000 to 2022 saw the rise of contract cheating as a major systemic risk, the industrial-scale growth and increasing sophistication of essay mill operations, the global spread of credential fraud, and the slow, uneven development of legislative and institutional responses. The release of OpenAI's ChatGPT in November 2022, followed rapidly by successive generations of large language model (LLM) tools, represented a qualitatively different inflexion point. These generative artificial intelligence (GenAI) tools can produce fluent, contextually appropriate academic text across virtually any discipline, assessment format, or style requirement, with minimal subject expertise on the part of the user (QAA, 2023a). Unlike previous technological threats to integrity, they operate within platforms embedded in everyday digital infrastructure, frequently integrated into word-processing and communication software, and, in many cases, provided free of charge (QAA, 2023b). Restricting access is practically impossible, and detecting their use, at best, highly unreliable (TEQSA, 2024c). The implications for assessment validity, credentialling, and quality assurance are thus profound.

This paper addresses a central question that sits at the intersection of these challenges, namely how quality assurance agencies are assessing, monitoring, supporting, and promoting academic integrity within their external quality assurance work, and to what extent their frameworks have been updated to reflect the realities of the generative AI era. The paper produces a comprehensive assessment of current practice, identifies critical gaps, and develops actionable recommendations.

The institutional rationale for this work is well-established. INQAAHE's [Guidelines of Good Practice](#) (ISGs, 2025) situate quality assurance within a global commitment to excellence, trust, and credibility in tertiary education. The [European Standards and Guidelines for Quality Assurance](#) (ESG, 2015), the primary reference framework for QA agencies across the EHEA, include an explicit reference to academic integrity in Standard 1.1, which states that institutional quality assurance policies should support "academic integrity and freedom" and be "vigilant against academic fraud." This is the only explicit reference to academic integrity anywhere in the ESG 2015. Yet as the ENQA Working Group on Academic Integrity (ENQA, 2024) found in its survey of 59 member and affiliate agencies, the treatment of academic integrity in QA frameworks across the EHEA varies enormously in depth, scope, and binding force, and the ESG's reference is far too limited to drive consistent institutional practice. The forthcoming revision of the ESG represents an important opportunity to address this.

As it stands, the [current draft 2 version of the ESG 2027](#), presented to the Bologna Follow-Up Group at its XCIX meeting in March 2026, includes an enhanced framework for academic integrity, including in relation to artificial intelligence:

- The guidelines for Standard 1.1 mention that 'The quality assurance policy is aligned with other institutional policies, including (...) academic integrity, with links to the responsible use of artificial intelligence and other digital technologies' and that 'The policy addresses the overall use and implications of artificial intelligence in learning, teaching and quality assurance processes.'
- Standard 1.3 mentions that 'Any use of artificial intelligence in learning, teaching and assessment should be responsible, human-centered and subject to human oversight'.

1.2 The evolution of academic integrity as a policy topic

Institutional codes governing student conduct, the prohibition of plagiarism, and expectations of honest scholarship have existed in formal and informal forms since the earliest centuries of organised university life. What has changed fundamentally in the contemporary period is the scale, complexity, and systemic nature of the challenge, driven primarily by technological change, the commercialisation of cheating services, and the globalisation of higher education.

Academic literature traces a significant intensification of scholarly and policy attention to academic integrity from the 1990s onwards. This period coincided with the rise of the internet, which radically reduced the barriers to accessing and copying source material, and with the expansion of essay mill services that commercialised academic misconduct on an industrial scale. The Handbook of Academic Integrity (Bretag, 2016), which brought together contributions from across the globe, documented the breadth and depth of this challenge:

from plagiarism and collusion at the student level, through research misconduct at the faculty level, to credential fraud and quality assurance failures at the institutional or systemic levels. The Second Handbook of Academic Integrity (Eaton, 2024) updated and extended this analysis, adding new chapters on artificial intelligence, equity, decolonisation, and the global diversity of integrity cultures, reflecting both the expansion of the field and its rapid evolution.

A key conceptual contribution of the academic integrity literature is the distinction, articulated by Bertram Gallant (2008) and reinforced in subsequent scholarship, between the "rule compliance" and "integrity" approaches to academic misconduct. The rule compliance approach is predominantly disciplinary, relying on detection, investigation, and sanction as its principal instruments. The integrity approach is developmental, emphasising values education, cultural change, and the building of institutional climates in which honest scholarship is intrinsically motivated. As Ellis and Murdoch (2024) observe, the history of higher education's response to cheating has been characterised by an oscillation between these two extremes, producing what Dawson (2020) describes as "a somewhat dichotomous situation: you're either pro-integrity or anti-cheating." Both scholars argue that this false dichotomy has produced responses that are systematically under-resourced and, ultimately, ineffective.

Ellis and Murdoch (2024) propose a synthesis in the form of the educational integrity enforcement pyramid, adapted from regulatory theory, which maps the full spectrum of institutional responses from awareness-raising and educational support at the base, through active monitoring and institutional accountability in the middle, to legislative and sanctions mechanisms at the apex. Their core argument, grounded in the work of Ayres and Braithwaite (1992), is that the pyramid is only effective when all levels are simultaneously present and functional: "if any of the links in the hierarchical chain of strategic responses and tactical interventions are missing, then none of the tactical interventions above it on the pyramid will work effectively." This insight is directly applicable to the role of quality assurance agencies, which operate most powerfully at the institutional accountability layer of the pyramid but can also support or enable every other level through guidance, capacity building, and legislative advocacy.

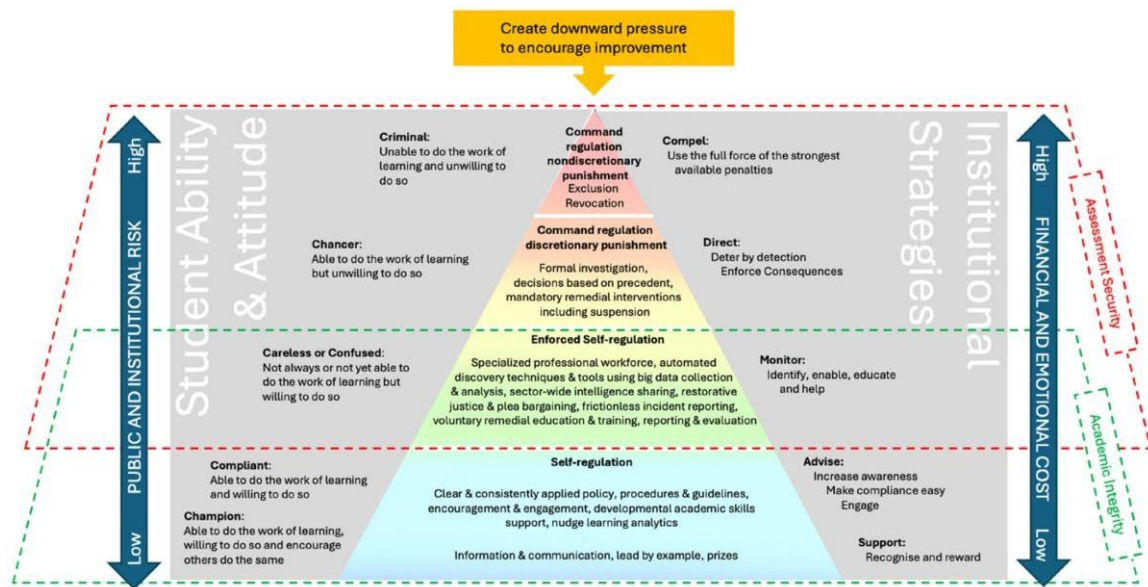


Figure 1 – AI enforcement pyramid (Ellis and Murdoch, 2024)

The emergence of generative AI as a new dimension of the integrity challenge has complicated this picture in ways that are still being understood. The ENQA Working Group on Academic Integrity, whose report (ENQA, 2024) represents the most comprehensive survey of QA agency practice in the EHEA to date, characterises the current situation as involving three intersecting AI components: Artificial Intelligence (the technology), Academic Integrity (the values and practices of honest scholarship), and Assessment Integrity (the validity and reliability of student evaluation). The intersections between these three elements create new forms of risk: AI tools can enable misconduct that does not fit traditional definitions of plagiarism, since the work produced may be entirely original in the textual sense while implying no authentic student learning; existing detection technologies are unreliable and prone to false positives (TEQSA, 2024c); and the pace of AI development outstrips the typical policy development cycles of higher education systems and QA agencies.

TEQSA (2024a) reports that Australian higher education institutions submitted action plans for responding to GenAI risks in July 2024, and that the sector has come to recognise the inadequacy of a "wait-and-see" approach. QAA's (2023a, 2023b) advice to UK providers similarly emphasised the need for rapid, agile policy review and the embedding of AI literacy as a graduate attribute (a quality an institution aims to develop across all its graduates, distinct from a course-specific competence) rather than a threat to be managed by exclusion alone. QQI (2021b, 2023) in Ireland, through the National Academic Integrity Network (NAIN), has produced specific guidance for educators on the pedagogical and assessment implications of GenAI. These responses represent early leadership in a field where most QA agencies have yet to update their formal frameworks.

1.3 Definitions and conceptual framework

1.3.1 Academic integrity

The term "academic integrity" carries different meanings in different cultural, linguistic, and institutional contexts, a point documented extensively in the comparative literature (Glendinning, 2020; IPPHEAE, 2013). Glendinning (2020) notes that in parts of Europe, including Bulgaria, Romania, France, and Finland, academic integrity is sometimes conflated with research ethics.

This paper adopts the broad, authoritative definition provided by the EHEA Ministerial Conference (EHEA, 2024) in its Statements on Fundamental Values, which defines academic integrity as:

A set of behaviours and attitudes in the academic community internalising and furthering compliance with ethical and professional principles and standards in learning, teaching, research, governance, outreach and any other tasks related to the missions of higher education.

This definition is deliberately comprehensive. It encompasses not only student conduct, including plagiarism, contract cheating, collusion, data fabrication, and AI-enabled fraud, but also faculty conduct, including research misconduct and the modelling of scholarly values; and institutional conduct, including governance integrity and transparency. The International Center for Academic Integrity (ICAI) operationalises the concept through six fundamental values: honesty, trust, fairness, respect, responsibility, and courage. These values, as QQI (2021a) notes, should be embedded not only in institutional policies and regulations but also put into practice through institutional cultures, assessment designs, and staff–student relationships.

Eaton (2024) proposes a Comprehensive Academic Integrity (CAI) framework that extends the concept across eight overlapping domains: everyday ethics, institutional ethics, ethical leadership, professional and collegial ethics, instructional ethics, student academic conduct, research integrity and ethics, and publication ethics. This framework is particularly valuable for QA purposes as it makes visible the full range of organisational functions that integrity touches, demonstrating that it cannot be adequately monitored by examining student misconduct policies alone. It positions academic integrity as a quality of institutional culture rather than a compliance requirement, with implications for how QA agencies design and conduct their evaluations.

1.3.2 Quality assurance agencies and their role

For the purposes of this paper, the term "quality assurance agency" refers to any external quality assurance body whose mandate includes the evaluation, accreditation, or audit of higher education institutions or programmes. This encompasses both national bodies operating within a single jurisdiction and regional or specialised agencies operating across borders or within specific subject areas. The 46 agencies analysed in this paper span a wide

spectrum of mandates, powers, and approaches, from statutory bodies with enforcement powers to advisory bodies producing guidance without binding accreditation consequences.

QA agencies occupy a structurally significant position within higher education systems, as the accreditation bodies responsible for evaluating institutional quality. Martin (2016) identifies external quality assurance as one of the main mechanisms through which systemic corruption and malpractice in higher education can be addressed at scale, noting that institutional self-regulation, without external accountability, has historically proven inadequate. The CHEA/CIQG Advisory Statement (IIEP/CHEA, 2016) directed eleven specific recommendations to AQABs for countering corruption in higher education, subsequently developed into a full inventory of action questions by CHEA (2019), reflecting a growing international consensus that QA agencies must take a more active and operationally specific role in this domain. A comprehensive review of anti-corruption policies and actions among accreditation and quality assurance bodies worldwide is provided by Glendinning, Orim, and King (2019).

The CHEA/CIQG Advisory statement refers to various types of academic integrity breaches referenced as ‘corruption in higher education’, namely in the regulation of higher education systems, in teaching, student admissions and recruitment, student assessment, credentials and qualifications, and in research theses and publications.

The INQAAHE toolkit for QA agencies to address academic integrity and contract cheating (INQAAHE, 2020) describes a four-step model structured around the cycle of Analyse, Educate, Intervene, and Assess. This model positions QA agencies as active partners in system-level academic integrity promotion through enhancement-oriented QA. At each step of the cycle, QA agencies are positioned to contribute to integrity through their unique capacities: aggregating institutional-level data into system-wide intelligence, developing shared definitions and standards, providing guidance and capacity building, requiring institutional accountability, and advocating for legislative and regulatory change where necessary. This framework provides one of the analytical reference points for the recommendations developed in Section 7 of this paper.

1.3.3 Generative Artificial Intelligence in the academic integrity context

Generative artificial intelligence, for the purposes of this paper, refers to AI systems capable of producing novel text, images, code, or other outputs based on statistical patterns learned from large training datasets, and accessible through conversational interfaces that require no specialist technical knowledge to operate. The category includes, but is not limited to, large language models (LLMs) such as ChatGPT (OpenAI), GPT-4, Google Gemini, Anthropic Claude, and Microsoft Copilot, as well as discipline-specific tools capable of generating mathematical proofs, scientific analyses, and programming code.

The academic integrity concerns raised by GenAI tools are distinct in important ways from those raised by earlier technologies. QAA (2023a) notes that submissions generated substantially or entirely by LLMs may not constitute plagiarism under traditional definitions, since the text produced is algorithmically novel rather than copied from a source. TEQS



(2024c) observes that AI detection tools, which have proliferated rapidly in response to these concerns, perform unreliably across populations, producing both false positives that can unjustly penalise students and false negatives that permit sophisticated misuse to go undetected. Therefore, AI literacy, critical evaluation of AI outputs, and the integration of AI use into authentic assessment design are more sustainable strategies than blanket prohibition or reliance on detection technologies.

The table below synthesises these conceptual pillars, mapping each to its core concept and its principal implication for quality assurance and enhancement.

Pillar	Core Concept	Links
Pillar 1	Reactive vs. Proactive Quality Assurance	Quality assurance and enhancement
Pillar 2	Three-AI Framework (ENQA, 2024)	Academic Integrity (values) + Assessment Integrity (measurement) + Artificial Intelligence (technology)
Pillar 3	Educational Integrity Enforcement Pyramid (Ellis & Murdoch, 2024)	Effective integrity governance requires a full spectrum of responses from educational support through institutional accountability to legislative sanctions. Absence of any level undermines the whole.
Pillar 4	Comprehensive Academic Integrity (CAI) (Eaton, 2024)	Integrity spans eight institutional domains: everyday ethics, institutional ethics, ethical leadership, collegial ethics, instructional ethics, student conduct, research integrity, and publication ethics.

Table 1: Core conceptual pillars

These four pillars build on one another: the shift from reactive to proactive quality assurance (Pillar 1) depends on recognising the Three-AI intersections (Pillar 2), is operationalised through the enforcement pyramid’s tiered response logic (Pillar 3), and is grounded in the full institutional scope set out by the CAI framework (Pillar 4).

1.4 Delimitations

The intersection of academic integrity, artificial intelligence, and quality assurance may generate conceptual ambiguity between objects and features of QA. Firstly, in relation to QA and academic integrity, we can distinguish between the QA of academic integrity and integrity in QA.

The object of the QA of academic integrity relates to how external quality assurance agencies evaluate whether institutions have adequate policies, procedures, training, enforcement mechanisms etc. to uphold academic integrity standards. This includes measures such as assessing institutional codes of ethics, plagiarism policies, student assessment approaches, disciplinary procedures, and academic writing support for students. The ESG 2015 addresses this dimension implicitly through Standard 1.3 (student-centered learning, teaching and assessment). In some cases, integrity' can have a broader sense including integrity of the higher education institution management (e.g., ethical conduct in institutional decision-making).

The integrity of the QA process relates to the ethical conduct and procedural integrity of QA agencies themselves and the external reviewers they hire. This concerns matters such as conflicts of interest, bribery, deliberate professional misconduct (as distinct from error or incompetence), and breaches of confidentiality within the QA process itself, as opposed to misconduct occurring inside the institutions under review. The ESG 2015 addresses this dimension through Part 3 (Quality assurance agencies), particularly Standard 3.3 (independence), which requires freedom from conflicts of interest, and Standard 3.6 (internal quality assurance), which addresses the professional and ethical conduct of QA staff and reviewers (discussed further in Section 2.4).

A second distinction should be noted between the QA of the AI (use and impact) in higher education and the AI (use and impact) in QA processes.

The QA of AI in higher education addresses how institutions integrate artificial intelligence into learning, teaching, research, assessment, internal quality assurance, and/or decision-making, including ethical frameworks, data privacy protections, bias mitigation, and pedagogical appropriateness of AI deployment. Among others, QA agencies can evaluate whether institutions have developed responsible AI governance frameworks and whether AI tools are being deployed in ways that enhance rather than undermine educational quality. It is important to note that this dimension is broader than (the QA of) academic integrity alone. While AI's impact on academic integrity (assessment validity, plagiarism, contract cheating) is a central concern, QA of AI use also encompasses broader institutional questions such as pedagogical innovation enabled by AI tools, data governance and privacy safeguards, and algorithmic transparency (for example, whether students and staff understand how and why AI-based decisions, such as automated feedback or plagiarism flags, are generated).

Finally, the use of AI in QA processes relates to how QA agencies themselves deploy AI tools within their own external review processes, including document analysis, thematic coding of self-assessment reports, report drafting, and data analytics. ENQA [published Guidelines for](#)

[the Responsible Use of AI in External QA](#) in December 2025, following a June 2025 workshop in Tallinn hosted by HAKA. These guidelines establish key principles agreed by European QA agencies, including that AI must support rather than replace human judgment, with final decisions remaining the responsibility of human experts in line with peer review principles; data privacy must be rigorously protected, with no personal or sensitive data processed without explicit consent; and agencies must maintain transparency about AI use while continuously monitoring effectiveness and accuracy. The guidelines explicitly state that AI is intended to augment, not substitute, the peer review model that underpins European quality assurance. The QA agencies' regulations on the use of AI in QA may include the use by staff and external reviewers and institutions. In our interviews below, this pattern was articulated most explicitly by NCQAA (Qatar) and HAKA (Estonia), with QQI (Ireland) reporting use of licensed Microsoft Copilot and MaxQDA Tailwind specifically to avoid public data exposure.

Having clarified these distinctions, it is important to note that in our analysis we will focus on the QA of academic integrity, respectively on the QA of AI (use and impact on academic integrity) in higher education.

1.5 Why QA Agencies cannot ignore academic integrity

The case for QA agency engagement with academic integrity is grounded in both principle and pragmatic necessity. From a principled standpoint (logic of appropriateness), the premise is that qualifications derive their value from the assumption that the achievements they certify are genuine. When academic integrity is systematically compromised, the signal value of qualifications deteriorates. Employers, professional bodies, regulatory authorities, and society at large are thus affected.

From a practical standpoint (logic of consequences), QA agencies are uniquely positioned to drive systemic change. Individual HEIs face structural pressures, and national governments may lack the expertise, resources, or political will to legislate comprehensively in this area. QA agencies combine independence with operational leverage, as their accreditation decisions, evaluation findings, and published reports carry consequences for institutional and programme recognition and reputation. When they make academic integrity visible in their criteria and actively assess its implementation, institutions respond both in order to comply with the criteria and in response to the signaling effect of the changes made by the agency.

The ENQA Working Group on Academic Integrity (ENQA, 2024) identified that while two-thirds of the 59 responding agencies reported that their country had a national approach to academic integrity, significant gaps remain in the specific coverage of emerging threats. Only 39% of agencies reported national legislation covering contract cheating, with the first regulations in New Zealand, Australia, Ireland and theUK, demonstrating that legislative solutions are available and effective. Less than half of agencies reported coverage of data manipulation, collusion, or file-sharing. And, as the desk research for this paper found, only 7 out of 46 agencies analysed (16%) have developed any explicit AI-specific policy within their quality assurance standards.

The consequences of inaction are not hypothetical. TEQSA's 2024 sector alert (TEQSA, 2024b) documented that commercial academic cheating services in Australia had become "more aggressive" in their targeting of students, using "blackmail and identity theft" against users of their services. The QAA's report on contract cheating (QAA, 2022) documented the scale and sophistication of the essay mill industry in the UK, and the multi-year advocacy campaign that eventually produced the provisions against contract cheating services in 2022.

Whereas quality assurance agencies can support fostering academic integrity, they cannot be expected to take the leading role, and it is even less realistic to expect quality assurance to 'eradicate' misconduct. It is important to acknowledge, at the outset, that QA systems face significant and largely unavoidable constraints in undertaking anything approaching a comprehensive assessment of academic integrity. Evaluator time, review-cycle length, staff capacity, and the inherent limits of documentary review mean that even a well-resourced agency can offer only a partial, necessarily selective picture of institutional integrity practice, not a systematic guarantee. The recommendations that follow are offered with this constraint explicitly in mind: they are calibrated to what is realistically achievable within existing resource envelopes, and do not presuppose that QA agencies will acquire materially greater capacity than they currently have.

1.6 Research questions

This paper addresses four core research questions, which structure the substantive sections that follow:

- How comprehensively do QA agencies currently monitor academic integrity, and what typological patterns are evident in policy approaches globally?
- How are QA agencies responding to the documented impact of generative AI on academic integrity?
- To what extent have QA frameworks been revised or updated post-2022 to reflect the challenges posed by generative AI?
- Beyond the direct monitoring of institutional integrity policies, through what other mechanisms do QA agencies support the development of academic integrity cultures in higher education?

These questions are addressed sequentially in Sections 3 through 6, which constitute the substantive analytical core of the paper. Section 7 translates the analysis into recommendations, and Section 8 provides the concluding synthesis.

1.7 Methodology and evidence base

1.7.1 Policy analysis

The primary dataset for this paper consists of publicly available documents related to the external QA work of QA agencies, such as accreditation or external quality assurance frameworks and methodologies, codes of ethics, self-assessment reports, external review reports, guidance documents, and sector alerts from 46 QA agencies across more than 30 countries. These documents were collected and catalogued through a systematic desk research process of INQAAHE members.

A complementary dataset covers 18 national and European policy instruments relating to academic integrity, including legislation from Australia, Czech Republic, Estonia, Ireland, Romania, United Kingdom and Ukraine; qualifications frameworks from Canada, New Zealand and the UAE; and intergovernmental documents from the European Higher Education Area and the Council of Europe.

The primary data was systematically coded along four analytical dimensions: (1) the presence and nature of AI-specific provisions; (2) the presence and nature of academic integrity provisions more broadly; (3) the typological classification of academic integrity policies and (4) the presence and nature of learning outcome-referenced assessment standards. These four dimensions were identified inductively through preliminary reading of the dataset and deductively through the conceptual framework as described.

1.7.2 Literature review

Forty-three academic and grey literature sources form the bibliographic foundation of this paper. These include peer-reviewed academic papers on academic integrity, contract cheating, assessment design, quality assurance governance, and the role of regulatory organisations in higher education ethics; major policy reports from ENQA, INQAAHE, CHEA/CIQG; seminal edited volumes including the Handbook of Academic Integrity (Bretag, 2016) and the Second Handbook of Academic Integrity (Eaton, 2024); comparative studies and scorecards covering European, Australasian, and global contexts including the IPPHEAE EU comparison (IPPHEAE, 2013) and the ENQA Working Group survey (ENQA, 2024); and practitioner-oriented tools, guidance notes, and frameworks.

In the table below we present the type of sources used in the preparation of this paper, as well as their coverage.

Source Type	Volume	Coverage
QA agency policy documents	46 agencies	Standards, accreditation criteria, codes of ethics, sector alerts, guidance notes from Europe, Asia-Pacific, Americas, Middle East, Africa
National/European policy instruments	18 instruments	Legislation (AU, CZ, EE, IE, RO, UK, UA), QF documents (CA, NZ, UAE), intergovernmental frameworks (EHEA, Council of Europe)
Academic and grey literature	43 sources	Peer-reviewed scholarship, edited handbooks, major policy reports, practitioner tools, sector guidance

Table 2: Summary of sources

1.7.3. Survey and interviews

To better grasp the situation on the ground, the author deployed a survey that was conducted by ARACIS to INQAAHE member agencies in December 2025, remained open until March 2026. The survey was answered by 9 QA agencies, which unfortunately did not allow for a statistically significant analysis of answers. We would like to thank the agencies for filling in the survey, whose results were extremely valuable both for better understanding the practices at national level for the 9 jurisdictions covered and for offering guidance for further desk research activities. A summary of survey results is included in chapter 3, with 2 annexes covering the full results (Annex 1) and the Survey questions (Annex 2).

Along with the survey, a set of 6 interviews was organised with selected QA agencies (see Acknowledgements), based on the interview methodology annexed (Annex 3). The results of the interviews are integrated into Chapters 3 and 4.

1.7.4 Limitations

The policy analysis relies on publicly available documents on the websites of QA agencies and may not fully capture informal guidance, internal practices, or recent policy developments not yet reflected in published standards in English. Furthermore, the pace of GenAI development means that specific findings about tools and detection technologies may require periodic updating. The agency dataset, while geographically diverse, is not exhaustive of the INQAAHE membership, and agencies not represented in the dataset may have practices and policies not captured here.

1.8 Structure of the Paper

After this section focusing on the introduction, the following sections continue:

- Section 2 provides the conceptual and historical context, addressing the relationship between academic integrity and quality assurance, the development of integrity frameworks within and beyond the EHEA, and the challenges that continue to produce uneven policy outcomes.
- Section 3 presents the core empirical analysis, mapping the current state of QA agency practice.
- Section 4 examines the impact of generative AI on academic integrity, analysing specific mechanisms of risk, the limitations of detection-based responses, and the relationship between AI tools and the pre-existing contract cheating market.
- Section 5 assesses the post-AI policy response among QA agencies, examining what agencies with explicit AI provisions have done and drawing lessons for the wider community.
- Section 6 addresses the broader repertoire of agency support activities: national networks, legislative advocacy, capacity building, guidance production, and cross-agency collaboration.
- Section 7 presents a structured set of recommendations and Section 8 provides the concluding synthesis.

Section 2: Quality assurance, Academic integrity, and their governance

The relationship between quality assurance and academic integrity is best understood not as one of oversight and enforcement but rather as one of structural interdependence. Quality assurance frameworks' reliability and *raison d'être* depend on the extent to which what they 'assure', the validity and usefulness of credentials, are trusted by the broad range of stakeholders. As credentials lose their validity when the learning they certify has not occurred, academic integrity should not be an ancillary concern for QA agencies, but a foundational precondition. Nevertheless, the historical record shows that most QA systems developed their quality frameworks without academic integrity embedded into the architecture. Understanding how that gap formed, why it persists, what it takes to close it, and how to think systematically about what QA of academic integrity means are the analytical tasks of this section.

2.1 From institutional concern to system-level approaches

Academic integrity as a policy domain has a recognisable trajectory. In the mid-twentieth century, the dominant institutional response to dishonesty was local, discretionary, and

deeply embedded in the culture of individual higher education institutions. Honour codes, faculty-administered discipline processes, and the informal socialisation of students into the norms of their disciplinary communities constituted the integrity infrastructure of most academic systems. This was adequate, if imperfect, for a world in which the scale of higher education was limited, the student population was relatively homogeneous, and the means of cheating required physical effort and social risk. All three of those conditions had changed substantially by the 1990s.

The massification of higher education, the diversification of student populations, and the arrival of the internet simultaneously transformed the operating conditions for academic integrity. The digitalisation of academic text made plagiarism trivially easy, and the global expansion of essay mill services made commercially produced essays accessible across language and jurisdictional boundaries. At the same time, the growth of international student mobility created student cohorts navigating the norms of unfamiliar academic cultures without adequate preparation. The first edition of a foundational reference work in the field, the *Academic Integrity Handbook* edited by Bretag (2016), documented how institutional responses were fragmented, inconsistent, and poorly theorised, with some institutions treating dishonesty as a criminal matter and others treating it as a pastoral one. Eaton (2024) extended this analysis in the *Second Handbook of Academic Integrity*, mapping the field across eleven thematic domains and identifying the emergence of a Comprehensive Academic Integrity approach as a governance paradigm that integrates student conduct, research integrity, publication ethics, and instructional ethics within a single institutional framework.

The theoretical contribution that most clearly explains the policy divergence observed across systems came from Bertram Gallant's analysis of institutional responses, which identified a fundamental bifurcation between two governing logics. The first, the rule-compliance approach, frames academic dishonesty as deviant behaviour to be prohibited, detected, and sanctioned through formal procedures. The second, the academic integrity approach, frames it as a failure of institutional culture to instill and sustain the values of honest scholarship. The two approaches rest on different theories of causation and produce different institutional architectures: a rule-compliance institution invests in plagiarism-detection software, misconduct procedures, and penalty schedules, whereas an academic-integrity institution invests in assessment design, staff development, student awareness, and cultural indicators. Most higher education institutions contain elements of both, but the balance between them and the extent to which quality assurance frameworks prioritise one over the other are consequential policy choices. This risk is not new, but generative AI intensifies it considerably, since rule-compliance logic risks producing narrowly technological responses to what is fundamentally a cultural and pedagogical challenge.

The policy landscape began to change more visibly from the mid-2000s onward. National academic integrity policies, sector-level guidance, and statutory frameworks emerged in a growing number of jurisdictions. The International Association of Universities and the Magna Charta Observatory jointly produced guidelines for institutional codes of ethics that provided a reference framework applicable across higher education systems (IAU-MCO, 2012).

National networks began to form: the Quality Assurance Agency's Academic Integrity Charter in the United Kingdom attracted over two hundred institutional signatories (QAA, 2020), while Ireland's National Academic Integrity Network established an infrastructure for shared guidance, research, and practitioner development under QQI's coordination.

However, in many countries 'QA and academic integrity' included two limitations: i) the perspective that academic integrity encompasses exclusively research ethics, a vision particularly prevalent in Eastern Europe in the mid-2010s (Glendinning, 2020), ii) the perspective that QA and integrity relates to the integrity of the QA process itself (rules regarding conflicts of interest, bribery, etc.).

The literature on the 'evaluative state' in higher education, pioneered by Guy Neave, provides a useful conceptual frame for understanding why a normative-operational gap persisted in the extent to which academic integrity was incorporated into the various tools in the government's toolbox for regulating, providing incentives, or assuring the quality of higher education. The evaluative state model of governance operates through the creation of accountability frameworks, performance metrics, and quality review processes rather than through direct prescription. It creates conditions under which institutions are evaluated on their outcomes while retaining formal autonomy over their processes. This model is efficient for many governance purposes, but it depends on the quality of the signals that evaluation processes send.

The table below outlines the main stages in the evolution of the concept of academic integrity among its main stages and the implications of the view for QA.

Period	Key Developments	QA Implications
Pre-2000	Honour codes, local disciplinary processes; limited cross-institutional consistency; no external accountability for academic integrity outcomes	Integrity treated as internal institutional matter; no systematic QA oversight
2000-2010	Digitalisation enables widespread plagiarism; text-matching software becomes standard; IAU-MCO (2012) Guidelines published; first national integrity policies in AU and UK	QA frameworks begin referencing plagiarism prevention or wider academic integrity
2010-2019	IPPHEAE survey reveals major cross-EU variation in how academic misconduct is tackled (2013), with no QA agency at the time explicitly and routinely including academic integrity in external QA frameworks; essay mill industry grows and contract cheating becomes systemic; Australia (2020) and Ireland (2019) enact legislation in this regard.	Reference to academic integrity in the revised ESG (2015); Legislative backstop creates enforcement capacity for QA agencies in AU and IE; CHEA/CIQG (2016) Advisory Statement proposes 11 recommendations for QA agencies; QA frameworks in most systems remain unchanged

2019-2022	The academic integrity discourse becomes dominant, percolating across the other policy fields, including QA. Academic integrity is defined as EHEA fundamental value. The COVID pandemic reinforces the importance of adequate assessment, learning outcomes, and the also limitations of 'policing' approaches.	INQAAHE Toolkit develops four-step model; ENQA establishes a Working Group on QA of academic integrity; majority of QA frameworks are updated, yet many descriptive and data collection remains limited
2022-present	ChatGPT launches November 2022; generative AI accessible to all students; some QA agencies begin rapid guidance deployment;	First AI-specific accreditation provisions appear (QAA, HAKA Standards, TEQSA Guidance Note 2024); 91.3% of agencies still operating on pre-AI frameworks

Table 3: Key milestones in academic integrity policy

2.2 Should Quality Assurance agencies include standards on Academic Integrity?

While in some cases it may be that in practice academic integrity is considered by QA agencies even if the normative dimension does not fully capture it, in other situations it is a deliberate choice not to cover academic integrity in the scope of QA agencies' work, either because of their governments' or their own decision. Understanding the potential arguments on both those sides is useful for predicting the way in which the balance would tilt in the coming years.

i) Arguments for including academic integrity in QA standards

The most fundamental argument for including academic integrity in QA standards is a credential argument: one of the main purposes of quality assurance is to provide assurance that a qualification represents genuine learning achievement, and any process that allows credentials to be obtained without that learning directly undermines what quality assurance is supposed to certify. As argued (Liuta, 2025), academic integrity is not a supplementary concern that happens to intersect with quality, but a constitutive dimension of educational quality.

A related argument is the systemic fairness argument. Academic misconduct that goes unsanctioned creates inequitable outcomes: students who invest genuine effort compete for grades, employment, and progression with students who have not. This is an equity issue as well as an integrity one, and equity is an explicit dimension of quality assurance in most contemporary frameworks. In addition, AI tools create new inequity in access to misconduct tools. Where QA frameworks treat integrity as outside their scope, they implicitly accept this inequity as a feature of the institutions or programmes they certify.

There is also a reputational argument, since higher education's social value, and the economic value of qualifications in labour markets, depend on employers, professional bodies, and wider society trusting that credentials mean what they say. CHEA/CIQG (2016) documented how corruption in higher education, including academic fraud, erodes the market value of credentials across entire national systems, not only at the institutions where misconduct is concentrated.

The enforcement pyramid argument, developed by Ellis and Murdoch (2024), provides a structural argument. Their model demonstrates that system-level change in integrity culture requires accountability pressure at all levels simultaneously: individual, institutional, and sector. QA agencies occupy the sector level of this pyramid. When they fail to exercise their leverage, the structural incentive for institutional investment at the lower levels is weakened. The corollary is powerful: where QA agencies do act, they multiply the effect of institutional efforts by creating sector-wide accountability that individual institutions acting alone cannot generate. Glendinning (2020), drawing on comparative analysis of QA agency practice internationally, reached the same conclusion: agencies that embed integrity requirements in accreditation criteria consistently produce better institutional outcomes than those that leave integrity entirely to institutional self-governance.

A practical argument, frequently underestimated, is the capacity to redistribute knowledge. QA agencies have access to practice evidence across all the institutions they oversee in a way that no individual institution does. They are uniquely placed to identify what is working in the sector, to package and disseminate that knowledge through guidance, sector alerts, and network convening, and to create the conditions under which lagging institutions can learn from leading ones.

ii) Arguments against and their answers

The first argument concerns a legal mandate: many QA agencies, particularly in civil-law jurisdictions with rigid statutory frameworks, argue that they cannot include academic integrity standards in their accreditation criteria because this is not explicitly authorised by legislation. This argument has genuine force in some contexts but can be frequently overstated. In Europe, the ESG's reference to vigilance against academic fraud provides a normative basis, while academic integrity can also be included in QA frameworks indirectly through assessing the validity of learning outcomes' assessments.

The second argument concerns priority: agencies with limited staff capacity and substantial existing workloads argue that work on academic integrity cannot be efficiently undertaken by the agencies. While this is a policy prioritisation argument, it should be answered by evidence that institutional misconduct is a significant and growing problem.

The third argument is role delineation: many agencies maintain that academic integrity is fundamentally an institutional responsibility and a matter of institutional culture, management, and student support, with external quality assurance bodies not the appropriate actors to govern it. Indeed, QA agencies cannot create integrity cultures, as only institutions can do that. Yet the argument confuses responsibility for culture with accountability for culture.

Thacker and McKenzie (2022) make this point specifically: QA frameworks do not substitute for institutional work, but they create the conditions under which that work is rewarded and its absence is visible.

The fourth argument is liability management: some QA agencies are reluctant to include integrity standards because they may fear being held responsible by students, institutions, or governments for misconduct that occurs in institutions they have certified. This concern reflects a misunderstanding of what quality assurance means. No accreditation system can certify that misconduct never occurs in an accredited institution; it certifies that the institution meets defined standards for tackling misconduct. An academic integrity standard certifies that an institution has appropriate policies, procedures, and quality culture. Moreover, the liability argument can also be repositioned inversely: a QA agency that certifies higher education institutions as quality providers without examining their academic integrity policies may bear greater accountability risks.

The fifth argument is perhaps the most intellectually interesting: some dimensions of academic integrity culture genuinely lie beyond the reach of quality assurance, and confusing what QA can assess with what integrity requires risks producing a reductive, compliance-oriented approach to a deeply cultural phenomenon. The culture of solidarity and collegiality, i.e. the informal norms that make academic honesty feel like a natural part of scholarly belonging rather than an externally imposed constraint, is not measurable by an accreditation panel examining policy documentation. Acknowledging these limits is important, as a QA framework that treats academic integrity as fully amenable to external measurement risks producing Goodhart's Law effects, where institutions optimise for measurable indicators rather than the underlying cultural reality. The response is not to abandon academic integrity assessment, but to design it by appropriately considering what external evaluation can and cannot see.

Taken together, these arguments reflect genuine institutional constraints rather than simple reluctance: legal frameworks, resource limits, role boundaries, liability exposure, and cultural complexity are all legitimate features of how QA systems operate, and an agency that does not yet address academic integrity explicitly should not be read as neglecting it. The analysis above is intended to inform how these constraints might be addressed over time, not to characterise the current absence as a failing.

iii) Does generative AI change the calculus?

The emergence of generative AI as a widely accessible tool for completing academic assignments does not merely intensify the existing case for QA involvement in academic integrity, but changes the nature of the case in three ways that deserve explicit acknowledgement.

First, AI changes the scale of the challenge. Previous integrity threats such as plagiarism or contract cheating had a limited reach, albeit a high impact. Generative AI is available to every student in every institution simultaneously, at zero cost. The baseline assumption that most students, in most assessments, are engaging genuinely with learning tasks can no longer be

made without active institutional measures to ensure it. Consequently, QA agencies that treat academic integrity as a narrow marginal compliance concern rather than a core quality dimension may find their existing frameworks mismatched to new realities in the context of the generative AI era.

Second, AI changes the distribution of harm. Previously, the students most exposed to detection and sanction were those who made the effort to obtain and use misconduct-enabling services, a transaction that created financial risk, reputational risk, and in some cases personal safety risk (TEQSA, 2024b; QAA, 2022). Generative AI spreads the risk of policy violation to students who have not actively sought to commit misconduct, to students who use AI tools for legitimate purposes but fail to understand where the boundaries lie, or use them in contexts where institutional guidance is absent or unclear, and to students who are falsely accused by unreliable detection systems. These are equity harms as well as integrity harms, and they fall disproportionately on students with the least institutional support. Quality assurance frameworks that require institutions to demonstrate fair and equitable assessment processes, a core ESG requirement, should thus address how institutions are managing this new category of risk.

Third, and perhaps most significantly, AI changes the persuasive weight of the arguments against QA involvement. The argument from role delineation, that institutional culture is beyond the reach of external quality assurance, rested on the assumption that institutions had sufficient structural incentives of their own to maintain academic integrity. The emergence of AI has disrupted the assessment architecture on which institutional integrity incentives depended. When AI tools can produce passable work for standard assessment tasks, the assessment designs through which institutions were supposed to verify learning are no longer functioning as intended. This is not an argument for QA disengagement, however, but the opposite: external quality assurance has a clear and specific object to identify whether and how institutions have redesigned their assessment approaches to restore the validity that AI tools may have undermined.

2.3 Constructing a conceptual framework for the QA of Academic Integrity

There is significant variation in what QA agencies examine, what they require institutions to demonstrate, and what the outer boundaries of the QA function in this domain are. These variations reflect different underlying theories of what academic integrity means as a quality dimension and what the limits of external quality assurance legitimately are. Mapping this variation in a structured way is analytically necessary for two reasons: it allows agencies to locate their current practice precisely, and it identifies the specific steps required to progress to a more developed form of engagement.

This paper proposes a five-level framework for QA engagement with academic integrity, conceptualised as a ladder in which each rung represents a qualitatively more demanding form of quality assurance practice. Each level is associated with a distinct set of evaluation questions, evidence requirements, and accreditation criteria. The framework draws on the empirical data from the comparative analysis in Section 3, the Glendinning (2020)

assessment of QA agency practice, the Ellis and Murdoch (2024) enforcement pyramid, and the INQAAHE Toolkit's four-step model.

An important observation is that for many agencies the entry point has historically been Level 1 because of the connection between valid assessment and academic integrity. The emergence of AI tools may have made the question of assessment validity so acute and so publicly visible, that some QA agencies are expected to address the higher-level dimensions of the ladder before they have fully resolved the lower ones.

The table below sets out this five-level ladder in full, explaining for each type of approach what the QA would examine.

Level	Label	What QA Examines	Core Evaluation Question
1	QA of Student assessment	Validity, reliability, and fairness of assessment methods; alignment with intended learning outcomes; assessment design quality; diversity of assessment modes	Do assessments genuinely and fairly measure what students have learned?
2	QA of Academic misconduct	Institutional policies on plagiarism, contract cheating, fabrication, falsification; plagiarism detection systems; misconduct investigation procedures; outcome data and sanctions; student and staff awareness	Do institutions have functioning systems for detecting, investigating, and sanctioning academic misconduct?
3	QA of Academic integrity in its policy context	Academic integrity governance embedded in institutional strategy and leadership; link between integrity and equity, social dimension, international student policy; inclusion of academic integrity in institutional risk management and strategies; connection to student support services	Is academic integrity embedded in institutional governance as a strategic priority?
4	QA of Academic integrity as a holistic system	The whole-institution integrity culture, including prevention, education, and response; staff training and development; student engagement in academic integrity governance; institutional research and scholarship into academic integrity; connection between academic integrity culture and broader ethics including anti-harassment, academic freedom, research integrity	Does the institution demonstrate a functioning culture of integrity across all its activities?
5	QA of Academic integrity in the context of AI	AI-specific policies and codes of conduct; AI literacy as a graduate attribute; assessment redesign for AI resilience; institutional response to GenAI tools in	Has the institution explicitly addressed the structural impact of generative AI on

		misconduct; detection tools available; staff capacity on AI-aware pedagogy; institutional action plans with official endorsement	its academic integrity systems and on the validity of its student assessment?
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Table 4: Framework for QA of academic integrity

The ESG's broad, principle-based language is capable of accommodating agency practice across the five-level framework above, though it provides little operational specificity to compel agencies toward more than Level 2.

The implementation of the ladder in practice

The framework reveals a characteristic pattern of progression and stalling. The majority of agencies are operating at Levels 1-3, examining whether assessments are valid and whether misconduct policies exist. The transition from Level 2 to Level 3 requires a shift in scope from examining whether misconduct procedures exist to examining whether integrity is embedded in institutional strategy, governance, and resource allocation. The progression through these levels can also be mapped against Bretag's (2016) five core elements of exemplary academic integrity policy: access, approach, responsibility, support, and detail.

This is a qualitatively more demanding examination, requiring evaluators who can probe beneath documentation into actual institutional practice. It is also the level at which the self-evaluation model is most likely to produce misleading results: an institution can document a strategic commitment to integrity without that commitment having produced any change in evaluation culture, staff behaviour, or student experience.

The transition from Level 3 to Level 4 is even more demanding, because it requires quality assurance to engage with the dimensions of integrity culture that are hardest to reduce to documented evidence: the informal norms, the peer relationships, and the degree to which honesty is a natural feature of academic life rather than an external constraint. This is the level at which the argument that 'some dimensions of academic integrity are beyond QA's reach' has most force, and it is the level at which the design of evaluation criteria requires the most intellectual care. The seven characteristics identified by Glendinning (2020) provide the closest approximation to an operational template for Level 4 evaluation that we currently identify in the academic literature.

Level 5 is, in principle, the most specific and therefore the most tractable of the five levels: it requires that institutions demonstrate they have addressed generative AI in their academic integrity and assessment frameworks. This specificity makes it operationally assessable and able to be embedded in formal accreditation criteria with a three-part evidence requirement (define, disseminate, respond) that is clear enough to evaluate consistently across institutions. A paradox is that Level 5 is the level at which the fewest agencies are currently operating, despite being in some respects more easily implementable than Level 4.

The 'top-down entry' observation that AI may prompt some agencies to engage with Level 5 before they have consolidated lower levels is analytically interesting to analyse in a future paper. AI is also the most likely to generate institutional energy and public attention, and thus also support for a faster integration in QA frameworks while also using the work of implementing Level 5 criteria to pull the lower levels into focus. This is not a conventional reform pathway, but it reflects the reality that a more rapidly changing environment asks for rapid adaptations in the sector, 'skipping' steps while also looking backwards to improve implementation in intermediate steps.

For ARACIS, the application of the five-level framework indicates a situation of Level 3, with existing initiatives planned for moving further. However, potential future activities may include:

- developing evaluator training on assessing assessment quality
- requiring institutions to better demonstrate a functioning response mechanism to academic integrity threats
- asking for data on academic misconduct during institutional reviews
- requiring that institutional policies, including those on QA, take into account the developments in the field of AI
- revising ARACIS Code of Conduct to include provisions about the use of AI
- providing a hub for Romanian HEIs, in cooperation with the National Rectors' Council, on materials related to academic integrity and AI

2.4 European and international frameworks for the QA of academic integrity

The international frameworks in which QA agencies operate – either intergovernmental and mandatory (in the European Higher Education Area) or organisational and facultative (such as the INQAAHE standards) influence significantly both the normative and socio-cultural dimensions of quality assurance. Apart from expectations regarding the content of standards or procedural requirements, they socialise the QA agencies into what is necessary, useful or emerging in the field of quality assurance. Particularly in recent years, academic integrity has emerged as a growing topic of interest both within the global QA community and in intergovernmental processes dealing with higher education. Understanding exactly what the major governance frameworks require, explicitly and implicitly, is a prerequisite for assessing how much latitude agencies have to act, and how much pressure they are currently under to do so.

1. The European Higher Education Area

i) The European Standards and Guidelines (ESG) 2015

The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) constitute the foundational document of the European quality assurance architecture. Last revised by ministers at the Yerevan Ministerial Conference, they define the framework within which all ENQA member agencies operate and against which EQAR-registered agencies are periodically reviewed.

The relation between ESG 2015 and academic integrity operates on two tracks: one explicit, one implicit. The explicit reference appears in Standard 1.1 on Policy for Quality

Assurance, which states that *institutional quality assurance policies should support 'academic integrity and freedom' and that institutions should be 'vigilant against academic fraud'* (ESG, 2015, p. 11). This is the most direct statement in the ESG about academic integrity, and it is placed as a guideline at the first standard dealing with the policy foundation of institutional QA.

The ENQA Working Group on Academic Integrity (2024) identified a further set of implicit references distributed across several other ESG standards. ESG 1.3 on Student-centred learning, teaching and assessment requires that *'the assessment of students reflects' an approach that encourages students to take an active role in creating the learning process'*, a formulation that encompasses the validity of assessment as a proxy for learning, and therefore implicitly addresses the conditions under which integrity is meaningful. ESG 1.5 on Teaching staff specifies that the environment *'offers opportunities for and promotes the professional development of teaching staff,'* which can extend to staff capacity on academic integrity. More directly, ESG 1.9 on Ongoing monitoring and periodic review of programmes requires that quality assurance covers *'the effectiveness of procedures for assessment of students'*, a formulation that should arguably encompass the validity of those assessments as genuine indicators of learning achievement.

Finally, ESG Standard 3.6, on internal quality assurance and professional conduct of agencies, requires that agencies' internal quality assurance policies *'ensure that all people involved in its activities are competent and act professionally and ethically.'* This is the basis for the internal ethics codes that almost all agencies possess, yet it addresses the integrity of the QA process itself not the integrity of the educational activities being evaluated.

These indirect references are significant because they imply that agencies seeking to substantially comply with the ESG could operationalise the standards, including through explicit references to academic integrity. One missing element in the ESG 2015, expectable in the context of the timing of its adoption, is any reference to artificial intelligence.

The ESG Revision: towards ESG 2027

At the time of writing, a revision of the ESG is underway, with the new version anticipated for adoption at the next EHEA Ministerial Conference. The ENQA Working Group report (2024) specifically notes that *'there have been debates about the role of quality assurance, and specifically of agencies, in monitoring and promoting academic integrity. This continues into the discussion about the scope and content of the forthcoming new version of the ESG.'* The outcome of that process, namely whether the revised ESG strengthens the explicit academic integrity requirement, adds operational specificity, or maintains the current formulation, will meaningfully influence the direction of European QA practice on academic integrity in the years ahead.

Based on the Statements on Fundamental Values adopted by ministers at the Tirana Ministerial Conference, one would expect that the direction of travel in the ESG revision discussions is toward greater specificity. The Tirana Statements on Fundamental Values explicitly state that *'the reference to the academic integrity policies in learning and teaching, research, in administrative procedures and in institutional governance should be included in*

quality assurance procedures and be reviewed by the appropriate internal and external bodies in line with European and national frameworks, including the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESGs)' (EHEA, 2024b).

At the XCIX Bologna Follow-Up Group meeting held in March 2026, the authors of the ESG presented the revised second draft of the new ESG. The text maintains guidelines related to academic integrity in Standards 1.1 and 1.3, and includes references to artificial intelligence in the same. Due to the clarifications related to the role of the Guidelines, however, the 'normative' value of the references to academic integrity may effectively decrease. In relation to the evaluation of the effectiveness of procedures for the assessment of students, this has been made optional ('regular monitoring may include') and moved to a guideline in Standard 1.2.

 [Draft 2 of the Standards and Guidelines for Quality Assurance in EHEA \(ESG\) 2027.](#)

Guidelines for Standard 1.1 Policy for Quality Assurance

The quality assurance policy is aligned with other institutional policies, such as those supporting the social dimension of higher education and those safeguarding fundamental values, including academic freedom, academic integrity, with links to the responsible use of artificial intelligence and other digital technologies, public responsibility of higher education.

Guideline for Standard 1.2 Design, approval, ongoing monitoring and periodic review of programmes

Regular monitoring may include the evaluation of: the effectiveness of procedures for the assessment of students;

Standard 1.3 Student-centred learning, teaching and assessment

Institutions should ensure that the programmes are designed and delivered in a way that fosters an active role of students in creating the learning process, and that the assessment of students reflects this approach.

Any use of artificial intelligence in learning, teaching and assessment should be responsible, human-centred and subject to human oversight.

ii) The EHEA Tirana Statements on Fundamental Values (2024)

The 2024 Tirana Statements on Fundamental Values, adopted at the EHEA Ministerial Conference in Tirana, represent the most explicit ministerial endorsement of academic integrity as a quality assurance concern in the Bologna Process's history. The Statements define academic integrity as '*a set of behaviours and attitudes in the academic community internalising and furthering compliance with ethical and professional principles and standards in learning, teaching, research, governance, outreach and any other tasks related to the missions of higher education*' and note that it 'plays a major role in ensuring the quality of all types of activity in higher education' and is 'central in building trust between higher education systems' (EHEA, 2024b). This definition, grounded in the European Network for Academic Integrity

(ENAI) Glossary is notable for its breadth: it encompasses governance and outreach as well as the more commonly cited learning, teaching, and research dimensions.

The Tirana Statements also address the role of QA explicitly, calling for 'independent bodies to monitor the implementation' of integrity standards, a formulation broad enough to encompass QA agencies without explicitly naming them, and stating that academic integrity considerations 'should be included in quality assurance procedures, and be reviewed by the appropriate internal and external bodies. The Statements further note that **'special attention needs to be paid to ensure academic integrity in the context of emerging digital technologies, such as the use of artificial intelligence'**, the most explicit ministerial-level endorsement of AI-adapted academic integrity governance in any EHEA document to date.

2. The Council of Europe

CM/Rec (2022)18 on Education Fraud

The Council of Europe's Committee of Ministers adopted *Recommendation CM/Rec (2022)18 to member states on combating education fraud* in September 2022, adding a soft-law instrument specifically addressing academic integrity threats. The Recommendation addresses several categories of education fraud, such as degree fraud, examination fraud, diploma mills, and contract cheating, and calls on member states to take coordinated legislative and regulatory action. It recommends that states designate appropriate authorities to monitor and respond to education fraud, that they cooperate across borders to address the cross-jurisdictional character of commercial cheating services, and that they ensure that quality assurance mechanisms include provisions on education fraud.

Furthermore, the Council of Europe is operating the ETINED Platform (Council of Europe Platform on Ethics, Transparency and Integrity in Education) which is a network of specialists appointed by member States of the Council of Europe and of States Parties to the European Cultural Convention with the mission to share good practices in the field of transparency and integrity in education, to define guidelines on the subject and to develop capacity-building for all actors. In this context they initiated projects supporting academic integrity (for example PAICKT for Armenia, Azerbaijan, Georgia, Kazakhstan and Turkey), and published volumes such as [Best practice programme in promoting academic integrity - A compendium of best practices](#) (2021), a compendium on [Legislation, practices and instruments](#) (2023) and a [Glossary of terms related to ethics and integrity in education](#) (2024).

3. The International Network for Quality Assurance Agencies

ISGs: Academic Integrity in 2022, and the 2025 Revision

The INQAAHE's International Standards and Guidelines for Quality Assurance in Tertiary Education (2022) represent a global equivalent of the ESG because they are the reference framework against which INQAAHE member agencies are evaluated and commit

to comply with. However, two notable distinctions relate to the fact that the ISGs are not adopted by ministers and are elaborated solely within the agency (in contrast with the co-creative process of the QA agencies, students and higher education institutions in the case of the ESG).

The 2022 version of the ISGs engaged with academic integrity in Guideline 2.2.6, which explicitly stated that the QA agencies' *'standards adequately address and promote academic integrity.'* This was a direct requirement that the standards used by an INQAAHE member agency to evaluate tertiary education providers must address academic integrity.

The core values that Guideline 2.1.2 specifies for agencies to respect and promote include 'equitable access, accountability, academic freedom, institutional autonomy, and social responsibility'. In this sense, a further difference from the European framework is that academic integrity is not treated as a fundamental value.

As with the ESG, there is a parallel distinction between QA process integrity and academic integrity. The 'Integrity, disclosure and transparency' standard addresses the integrity of the QA agency's own processes, including confidentiality, conflict of interest, and transparency of decision-making.

The 2025 revision of the INQAAHE ISGs introduced a significant change in this regard. While the revised ESG retained provisions on the QA process integrity, academic integrity was completely removed from the new ISGs, representing a regression in the explicit treatment of academic integrity in the global QA standards framework.

4. Other soft law and guidance instruments

Alongside the binding and quasi-binding standards frameworks, a range of soft law instruments and sector guidance documents provide substantive frameworks for QA agency action on academic integrity. **The CHEA/CIQG Advisory Statement for Effective International Practice on Combatting Corruption in Higher Education (2016)** provides the most operationally specific guidance for quality assurance and accreditation bodies, with eleven concrete recommendations. These include adopting explicit accreditation criteria requiring institutional policies on academic integrity; requiring independent verification rather than sole reliance on self-reports; publishing enforcement data; establishing inter-agency cooperation for cross-border threats; and including academic integrity in periodic review frameworks systematically. A subsequent CHEA inventory documented the state of implementation across CHEA member agencies, providing a stocktaking that predates the current project's comparative analysis but confirms the baseline pattern of underinvestment.

The **IAU-MCO Guidelines for an Institutional Code of Ethics in Higher Education (2012)** operate at the institutional level, providing a reference framework for what institutional ethics codes should contain. The QA agencies could consider these guidelines when seeking to assess the academic integrity policies at institutional level. These include provisions on student conduct, research integrity, and governance ethics.

The INQAAHE Toolkit to Support Quality Assurance Agencies to Address Academic Integrity and Contract Cheating (2020) translates the normative commitments of the ISGs into a practical, four-step action model. The model's *Analyse-Educate-Intervene-Assess* cycle provides a structured framework for agencies at any stage of policy development, from those beginning to engage with the topic to those seeking to evaluate and refine established programmes. The Toolkit defines six categories of breaches (plagiarism, collusion, copying, impersonation, contract cheating, data fabrication and falsification) and provides actionable guidance based on insights from leading QA agencies in strategy, policy and practice. The figure below summarises the Toolkit's key recommendations:

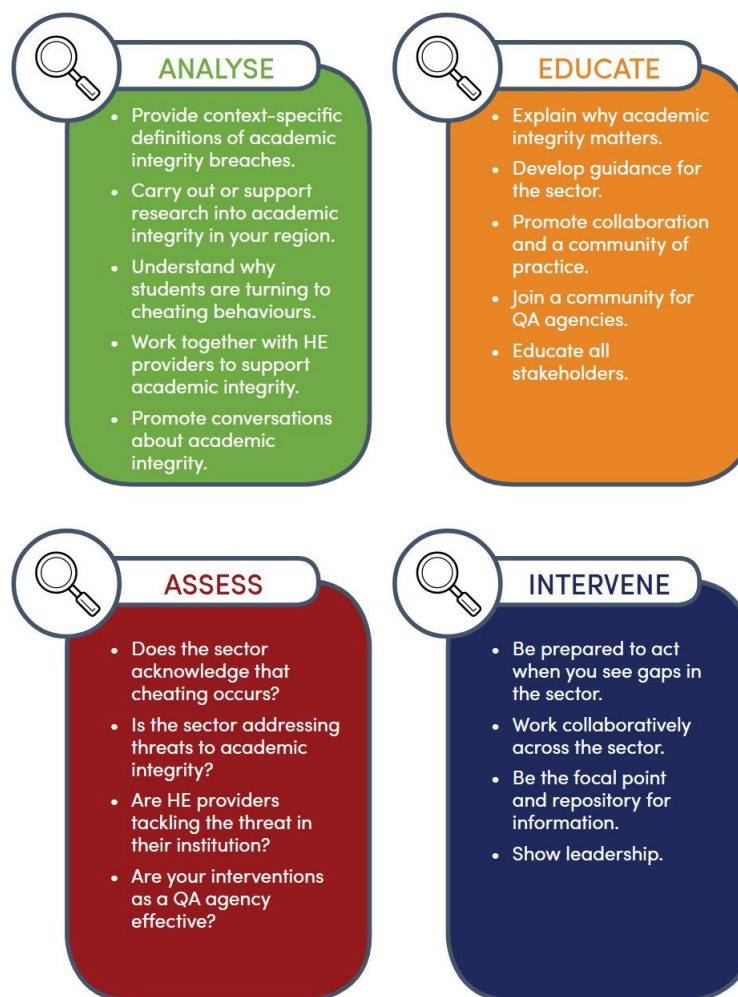


Figure 2: Key recommendations, INQAAHE Toolkit (2020)

Finally, the **Global Academic Integrity Network** (GAIN), established in 2023 by QQI and TEQSA, represents an emerging global infrastructure for academic integrity knowledge sharing, able to influence through peer learning and network effects the shape of QA of academic integrity at global level.

Furthermore, in the absence of a setting similar to the EHEA, the QA agencies (INQAAHE) together with higher education institutions (International Association of Universities - IAU) and students (Global Student Forum – GSF) could consider reaching further agreement on shared principles in QA, including standards related to the QA of academic integrity.

The academic literature also produced various toolboxes and scorecards for stakeholders interested in academic integrity that can drive enhancement and benchmarking. One of the best known ones is the **Scorecard for Academic Integrity Development**, which combines the Academic Integrity Rating System (AIRS) developed by the International Center for Academic Integrity (ICAI) and the Academic Integrity Maturity Model (AIMM). The scorecard includes the following characteristics:

- Top level governance and strategic commitment to support academic integrity
- Clear and consistently applied policies and procedures for academic integrity
- Fair and proportional sanctions applied across the institution or campus
- Engagement and buy-in from the whole academic community towards strategies for deterring academic misconduct
- Institutional culture and values for encouraging scholarship and deep learning
- Student leadership in actively supporting the institutional strategy for academic integrity
- Transparency, openness, maintaining institutional data, effective communications at all levels
- On-going evaluation, monitoring, reviews to enhance strategy, policies and systems
- Engagement with research and development within and external to the institution into academic integrity
- Institutional understanding of what constitutes acceptable academic practice, in line with international norms.

5. Other Regional Frameworks

The governance frameworks described above are primarily European and global. However, academic integrity is increasingly addressed at regional level in other parts of the world, and the comparative picture is relevant for understanding both the diversity of approaches and the extent to which regional QA frameworks are embedding academic integrity requirements.

In Latin America, the RIACES (Ibero-American Network for Quality Assurance in Higher Education) provides a regional network function but has not, to date, developed a specific framework for academic integrity comparable to the European one. The Caribbean presents an interesting exception: Baker-Gardner (in Eaton, 2024) documents that accreditation agencies in Jamaica, St. Vincent and the Grenadines, and Guyana have developed academic integrity-specific accreditation requirements, with the Jamaican agency providing detailed evidence specifications for both programme and institutional accreditation.

In Africa, the regional quality assurance field is developing, with the African Quality Assurance Network (AfriQAN) and national agencies at different stages of maturity. Available evidence does not suggest systematic regional engagement with academic integrity as a QA dimension, though the issue is present in national HE governance debates in several countries.

The ASEAN Quality Assurance Network (AQAN) provides a framework for the Southeast Asian context; the comparative strength of MQA (Malaysia) and HEEACT (Taiwan) relative to some other AQAN member agencies reflects the within-region variation characteristic of most regional groupings. In Arab states, the Arab Network for Quality Assurance in Higher Education published core quality standards and guidelines with one standard on institutional integrity (Standard 11).

The absence of strong regional governance frameworks for academic integrity creates a particular responsibility for global networks like INQAAHE. Where a QA agency operates in a context without strong regional normative architecture, the INQAAHE ISGs and Toolkit are the primary international reference frameworks available, underscoring the importance of maintaining strong academic integrity provisions at the global level.

2.5 The National Level: Legislation and QA practice

What the Bologna Process Implementation Report 2024 Reveals

The Bologna Process Implementation Report (EHEA, 2024a) provides the most comprehensive and comparable cross-national dataset currently available on the state of academic integrity policies across the 49 EHEA member countries. Its data on academic integrity is drawn from BFUG questionnaires completed by member states in 2023 and constitutes a unique cross-country snapshot. Three dimensions of the Report's findings are directly relevant to this paper.

First, on legislative frameworks: the BPIR documents that Montenegro is the only EHEA country to have adopted a dedicated Law on Academic Integrity, which it did in 2019. Among the remaining countries that mention academic integrity in legislation, only one fifth include a definition of the term. The definitions that do exist 'all encompass issues of plagiarism and research misconduct,' but diverge substantially in volume and specificity. Some countries, including Estonia and the United Kingdom, define academic integrity through legislation but 'more narrowly on student practice' rather than at a whole-institution or system level. This definitional fragmentation at national level directly mirrors the definitional gap identified in QA agency frameworks in Section 3.2 below: the absence of shared definitions at the national level creates the conditions under which agencies can develop frameworks without normative grounding, and vice versa.

Second, on QA monitoring of academic integrity: approximately half of EHEA countries report a legislative requirement for an external body to evaluate the exercise of academic integrity in higher education institutions. Of those, the majority designates the national QA agency as the responsible body. This is a significant finding: in the majority of EHEA countries where

external integrity evaluation is required by law, the QA agency is the designated evaluator. The exceptions (Azerbaijan, Finland, Poland, Romania, Sweden, and Turkey) designate alternative public bodies. In Sweden, this is a relatively recent development, with the Swedish National Board for Assessment of Research Misconduct (NPOF) established only in 2020.

Third, on data and transparency: the Report documents that 'an overwhelming number of countries do not collect data on academic misconduct in higher education institutions, and among those that do, this data is not publicly available in many.' The exceptions are Finland through the National Board on Research Integrity (TENK), and Denmark through the Danish Board on Research Misconduct. For EHEA countries, the absence of data on academic misconduct prevalence means that the scale of the problem cannot be demonstrated with national evidence, creating the circular data deficit problem identified throughout this paper.

Fourth, on promotion and training: top-level authorities require HEIs to offer training on plagiarism, contract cheating, and/or academic fraud in approximately a third of EHEA countries. Romania is in this group, as it requires training for students on all three topics. However, ESU's 2024 Bologna with Student Eyes data suggests that in only a handful of countries does such training systematically take place in practice, with only partial implementation in around half of countries. The gap between legislative requirement and operational delivery is precisely the gap that QA monitoring is supposed to close.

Country-Level Profiles: Leading National Systems

Several national systems are worth profiling individually as illustrations of the relationship between legislative frameworks and QA practice. Australia, Ireland, the United Kingdom, Estonia, Ukraine, Lithuania, Canada and Romania each represent distinct configurations of national legislation and QA agency engagement.

Australia has the most integrated national system, in which the TEQSA Act (as amended in 2020 to include criminal penalties for contract cheating services), the Higher Education Standards Framework, and TEQSA's operational guidance function together and constitute a coherent legislative-regulatory-educational ecosystem. The causal relationship is clearest here: the legislative backstop transformed TEQSA's enforcement capacity and created institutional incentives. The 2020 amendment was preceded by TEQSA's own published evidence base on the scale of the contract cheating industry, demonstrating that the QA agency played a direct role in building the legislative case (Australian Parliament, 2020). This is a model for ARACIS's potential legislative advocacy function described in Section 7. In addition, in a specific governance model, principles on academic integrity policy have also been adopted by the national sector body representing higher education institutions, Universities Australia, in 2017. This self-regulatory enforcement mechanism support both peer learning and a bottom-top architecture.

Ireland represents a similar and parallel trajectory. The 2019 amendment to the Qualifications and Quality Assurance Act, adding Section 43A and creating criminal liability for those who facilitate cheating, was developed in close partnership with QQI, which is responsible for bringing prosecutions under the section. QQI's NAIN network, developed

simultaneously, created the operational infrastructure through which the legislative mandate is translated into institutional practice. Ireland thus demonstrates both the legislative-QA integration model and the network model as complementary mechanisms.

The United Kingdom's approach is more fragmented. The UK Higher Education (Freedom of Speech) Act 2023 and the earlier Education Act 2022 (which addresses contract cheating services in England and Wales) create a partial legislative framework, while QAA operates as a non-statutory sector body whose Quality Code provides normative guidance without binding enforcement authority. The UK thus represents a case where legislative and QA functions are partially separated, a separation that the QAA has managed by developing strong sector leadership and open guidance resources rather than relying on statutory enforcement.

Estonia demonstrates the European classic ESG-compliant model. The Standard of Higher Education, which forms part of the national regulatory framework, establishes requirements for assessment methods and quality that are reflected in HAKA's accreditation standards, including Standard 8.4 with its AI-specific code of conduct requirement. The national legislative reference point gives HAKA's accreditation criteria legal grounding; the explicit AI language in the Standard demonstrates how quickly national frameworks can be updated when there is political will to do so.

Ukraine is in the advanced stages of enacting a dedicated Law on Academic Integrity, building on existing Law on Higher Education provisions that already define integrity violations and require institutional systems for ensuring integrity. NAQA has developed advisory guidance and accreditation criteria reflecting these legislative requirements. The Ukraine case also illustrates the potential for rapid policy development when political conditions are made favorable by the combination of EU integration aspirations and a post-conflict reform agenda.

Lithuania's Ombudsperson for Academic Ethics and Procedures provides an example of a non-QA-agency national body with specific integrity monitoring functions, the kind of arrangement that Romania also has in some dimensions. Lithuania's Recommendations on the Preparation, Adaptation and Implementation of Academic Ethics Codes provide a framework for institutional code development that SKVC, the QA agency, can reference in its evaluations. The separation of enforcement (Ombudsperson) from quality review (SKVC) creates a division of function that has advantages (e.g. the Ombudsperson can act punitively without creating perverse incentives in the QA relationship) but also risks coordination failures.

The **Canadian** case is also distinctive given the federal nature of the country and the lack of federal powers to regulate higher education. As a response, instead of a federal regulation regarding academic integrity, the Council of Ministers of Education included 'academic integrity' in one of the six degree-level standards (similar to level descriptors in the Qualifications Framework of the EHEA) related to professional capacity/autonomy. As all degrees in Canada should meet the degree level-standards, the professional attitude of 'integrity' indirectly mandates academic integrity as such in the higher education institutions. The

Council of Ministers also linked these expectations to procedural requirements, with a particular interesting reference to the standard that procedures handling academic misconduct follow the ‘principles of natural justice’ (Dyjur & Grant, 2024). A second approach undertaken in Canada is that of self-regulation, as the national university body, Universities Canada, requires its membership to comply with collectively agreed principles as criteria for membership. One of such criterion is the ‘commitment to the quality and integrity of academic programs’. (Universities Canada, 2019).

Romania offers one of the most detailed legislative frameworks on academic integrity, partially driven by the legalistic approach towards combating plagiarism, evidenced by the case law on the matter. These legislative provisions are complemented by corresponding criteria embedded within ARACIS's own accreditation standards, as discussed further in Section 3.5. The Romanian law itself mandates that the external QA framework covers academic integrity. The Romanian law details:

- the national and institutional bodies responsible for tackling academic integrity (the National Commission for Ethics and University Management and the institutional Ethics Committees), including their role, composition, procedural rules, competencies etc. The National Commission monitors the implementation of university ethics and professional conduct policies at the university management level, audits university ethics committees in higher education institutions and submits an annual report to the minister, and reviews appeals against the decisions of academic ethics committees;
- the types of academic misconduct (in teaching and university research activities; in scientific communication, publication, dissemination, and popularization; in the exercise of duties related to leadership positions; regarding respect for human life and dignity), the procedure for complaints, and potential sanctions
- the regulations for academic integrity, notably beyond the law:
 - the Framework Code of Ethics and Professional Conduct, approved by Government decision;
 - the Framework Regulations on the organization and operation of university ethics committees at the level of higher education institutions, approved by an order of the Minister of Education;
 - standards and guidelines on ethics management, as part of the Methodology for External QA evaluation, standards, benchmarks, and the list of performance indicators, approved by a Government Decision;
 - the Code of Ethics and Professional Conduct of the institution of higher education;

Furthermore, the Romanian law includes mandatory minimum provisions for the institutional Code of Ethics (such as the educational, administrative, and technical measures taken to ensure the originality of bachelor's, master's, and doctoral theses, the identification of situations involving conflicts of interest and incompatibilities, the measures necessary to strengthen or, where appropriate, develop an organizational culture of a moral nature, guidelines for seeking counseling and/or reporting unethical behavior, principles regarding

the management of ethical risks, and methods for training and assisting members of the academic community). The rector of the university and the dean of each faculty must report annually on the implementation of this framework. Simultaneously, the law mandates the inclusion of ethics and research integrity as a compulsory subject for all study programmes.

Is There a Causal Relationship Between Legislation and QA Provision?

A question of analytical and policy significance is whether the presence of national legislation on academic integrity causes or at least systematically predicts higher levels of QA agency provision.

Whether or not the national legislation specifically regulates academic integrity depends on historic and contextual factors, as well as the paradigm embraced by the academic community on what academic integrity means. Firstly, it may be influenced by the legislative policy in general and the extent to which such elements are treated at institutional level only, based on the force of institutional autonomy as a prevailing value. Secondly, it may depend on the extent to which academic integrity covers only 'research ethics' (where regulations are more common) or a broader, more holistic perspective. Thirdly, a more legalistic approach to academic integrity can be in contraposition with a 'morality' based ethical approach. In the United States, both the prevailing schools of thought seeing academic integrity as a value-dimension or a skill for students to learn (Eaton, 2024b) led to few (but not inexistent) regulations or QA practices related to academic integrity in a systematic manner.

However, the prevailing paradigm must be aligned with the legislative approach used, otherwise incongruences can appear – for example, an article exposes how in Malaysia academic misconduct is treated less seriously because it is considered an ethical concern rather than a legal requirement (Cheah, 2024).

However, on whether the existence of legislation on academic integrity leads to increased QA of academic integrity, the evidence supports a nuanced answer. In the strongest cases, such as Australia and Ireland, there is a mutually reinforcing relationship between legislation and QA provision, but the causal arrow runs in both directions: the QA agencies built the evidence case that enabled legislation, and the legislation then strengthened the QA agencies' enforcement capacity. This is a case where QA action and legislative advocacy developed in parallel, each reinforcing the other (e.g. TEQSA did not wait for the 2020 amendment to start developing academic integrity guidance; it developed guidance that informed the case for the amendment, and then used the amendment to strengthen what it was already doing).

The Romanian case sits in the middle of this spectrum. Romania has a legislative framework that references academic integrity, defines violations, and requires training for students; it designates external bodies (notably CNEMU and ARACIS) as responsible for evaluating institutional compliance

While it is evident from BPIR 2024 that countries with legislation on academic integrity have, on average, stronger QA provision, the causal relationship may be bidirectional, and several cases demonstrate that QA agencies can act meaningfully both in the absence of the comprehensive legislative frameworks and by helping develop such frameworks.

Section 3: Mapping academic integrity provision in quality assurance

The empirical core of this paper is a systematic mapping of academic integrity provision across 46 quality assurance agencies in 40 countries. The empirical data are drawn from the desk research of the author, cross-referenced against the secondary sources.

The desk research was complemented by the survey findings, which however was filled in only by 9 QA agencies from 9 different jurisdictions. Despite the small number, the survey results clearly showed that less than half of jurisdictions have national academic integrity frameworks, almost none have AI frameworks for higher education, and no surveyed agency had adopted an internal AI policy. Most surveyed agencies were integrating AI considerations, but mostly by embedding them in existing standards (learning/teaching, assessment, governance) rather than dedicated AI-specific frameworks. Strong consensus exists on priorities including assessment validity, faculty training, and research integrity being recognized as requiring urgent attention regarding AI and academic integrity. Institutional responses identified by surveyed QA agencies emphasize redesign over detection, with portfolio-based and project-based assessments as the most commonly observed modifications. The respondents recognized that substantial work remains to develop capacity for addressing AI-related challenges effectively, with main concerns including advances in the AI outpacing detection capabilities, erosion of critical thinking skills, and loss of authentic assessment validity. The full results of the survey can be found in Annex 1.

3.1 Dataset and analytical framework

The dataset comprises 46 QA agencies reviewed through their publicly available accreditation standards, evaluation methodologies, sector guidance documents, and policy statements. Agencies span five major regions: Europe (31 agencies), Asia-Pacific (7), the Americas (5), the Middle East (2) and Africa (1). The dataset includes agencies at multiple stages of institutional development: global leaders in the QA of academic integrity, agencies with partial or emerging provision, and agencies with little documented provision. This distribution is itself analytically important, reflecting the diversity of INQAAHE's membership.

The analytical framework we propose uses a five-level typology running from Type A to Type E. These types are, in principle, additive: an agency classified at Type C typically also satisfies the criteria for Types A and B. The hierarchy captures the progressive elaboration of standards and policies for academic integrity.

Before presenting the classification data, a structural deficiency affecting the entire group must be identified that affects the entire group and is not captured by the typological ladder alone: the near-universal absence of definitions of academic integrity within QA or associated

frameworks. Of the 46 agencies reviewed, less than 20% provide any working definition of academic integrity in their published standards or guidance documents. The remaining agencies, inter alia, embed requirements that institutions have academic integrity policies, that students be informed of academic conduct expectations, that misconduct be sanctioned etc., without specifying what academic integrity means, what acts constitute violations, or how the concept relates to other normative commitments.

While there may be systems where a definition is adopted in the primary or secondary higher education law, thus rendering a separate definition in the QA methodologies unnecessary, it is very well possible that this is not the case for many of the national systems in which the analysed QA agencies operate. The lack of appropriate definitions may imply that higher education institutions and other stakeholders in the same national system may interpret accreditation requirements or regulatory expectations on academic integrity differently. Similarly, it may be difficult for evaluators to adequately assess compliance. Finally, and most relevantly for the AI era, the absence of definitions creates a specific vulnerability when new forms of misconduct emerge. An institution can plausibly claim that its academic integrity policy already covers AI-assisted misconduct if the policy uses language broad enough to encompass any form of dishonest submission; yet it may be the case that no actual oversight of AI assisted misconduct is in place and the relevant procedures are not future-proof. On a similar note, the ENQA Working Group on Academic Integrity (2024) also identified the definitional gap as a priority concern for the European QA community.

A clear and notable exception is QQI from Ireland, whose National Academic Integrity Network produced a document entitled National Principles and Lexicon of Common Terms (QQI, 2021a) providing shared definitions for the entire Irish higher education sector. The initiative had been promoted as an example of good practice among the global stakeholders and even directly embraced by other QA agencies (New Zealand). The lexicon distinguishes between academic misconduct, contract cheating, plagiarism, collusion, fabrication, and falsification, giving both institutions and QA evaluators a common academic repertoire and definitional reference point. SAAVS (Slovakia) also provides another example where what constitutes academic fraud is detailed in a national legislative framework.

3.2 Distribution of QA agencies across the identified typology

Five agencies (11%) are classified at Type A, with no documented provision specifically addressing academic integrity either implicitly (through standards on validity/reliability of learning outcomes-based student assessment) or in institutional accreditation contexts. A further six agencies (13%) are classified at Type B, where assessment validity and reliability requirements create implicit conditions for academic integrity. Together, Types A and B account for 11 agencies (24%). The largest single group, and thus the modal response of the global QA agency community is composed of 21 agencies (46%) and classified at Type C, where academic integrity appears as an explicit named standard or indicator in accreditation criteria. Seven agencies (15%) are included in Type D, with specific guidance or sector instruments targeting contract cheating, plagiarism, or both, usually additional to the specific

standards. Finally, seven agencies (15%) are included in Type E, with explicit provisions addressing artificial intelligence in academic integrity contexts.

The aggregate picture is one in which explicit academic integrity standards are present in the majority of frameworks (76% at Types C-E), but specific operational guidance remains the exception (30% at Types D-E) and AI-specific provision remains exceptional (15%). The policy update gap is concentrated on the transition between Types C and D: agencies have adopted the normative commitment without yet developing the operational instruments.

Since the desk research focused on the available English-language documentation, the situation may be even more skewed in favour of the positive picture. Since the QA agencies that are more active in internationalisation would also be more socialised towards the importance of academic integrity as a QA standard, it is expected that those not covered by our study will tend more towards the Types A-B tail of the ladder.

The chart below sets out this distribution in full:

Type	n (%)	Description
Type A	5 (10.8%)	No specific provision on academic integrity identified in institutional accreditation contexts. Internal staff ethics codes for evaluators usually exist but primarily address QA process integrity.
Type B	6 (13%)	Implied academic integrity through requirements for validity, reliability, and fairness of (learning outcomes-based) student assessment. Academic integrity is generally not named explicitly but is structurally implied by assessment quality standards.
Type C	21 (45.6%)	Separate and explicit standard or standalone indicator on academic integrity embedded in institutional or programme accreditation criteria. The term 'academic integrity' or an equivalent is named and institutions must demonstrate compliance.
Type D	7 (15.2%)	Provisions specifically targeting cheating, plagiarism, contract cheating, or equivalent misconduct through published guidance, sector campaigns, toolkits, legislative advocacy, or specific requirements beyond the standard itself.
Type E	7 (15.2%)	Specific indicator or provision on artificial intelligence embedded in accreditation standards, guidance notes, or binding sector requirements stemming from the QA agency, with AI named explicitly
Total	46 (100%)	Types C–E (explicit provision): 35 agencies (76%) Types D–E (operational guidance): 14 agencies (30.4%) Type E (AI-specific): 7 agencies (15.2%)

Table 5: Distribution of 46 QA Agencies by Provision Type (A–E)

3.3 The proposed typology: definitions and implicit theories

Each type embodies a different theory about what quality assurance agencies are for and what they owe the institutions they oversee. Type A may reflect an implicit theory of institutional autonomy, that how institutions manage student conduct falls outside the QA agency's proper scope. Type B reflects a 'quality-as-proxy' approach, presuming that structurally valid assessments implicitly promote integrity without requiring explicit commitment. Type C reflects normative governance leaning towards accountability, with a specific mandate for integrating academic integrity into the functioning of a QA system. Type D reflects additional operational guidance, moving from accountability to further enhancement by providing additional guidance documents, detailed descriptions on how to foster academic integrity, toolkits or legislative initiative. Finally, type E reflects adaptive governance in which frameworks are updated in response to structural changes, most precisely in our case generative AI.

Based on the observed data, the move from Type C to Type D is analytically the most consequential and also the most resource-intensive. It requires a QA agency to invest in knowledge production and additional sector service. Many agencies that have adopted explicit academic integrity standards in their accreditation criteria seem to be still working on developing additional instruments for detailing the standards, their assessment and, even more importantly, how they are operationalised and fostered in practice. It may also be argued that moving from Type C to Type D requires, in itself and in some cases, a reconceptualization of the role of the QA agencies. This is precisely why only 14 of 46 agencies (30,4%) have reached Type D or beyond. The table below combines the category identified with the implicit theory of the link between QA and academic integrity and the agencies identified in each label:

Type	Label	Implicit Theory	Identified Agencies
A	No provision on academic integrity; QA integrity present	Institutional autonomy: academic integrity as such beyond QA scope.	AEQES (BE), AQAS (DE), ACPUA (ES), HAHE (EL), NACB (BZ)
B	Implied integrity	Quality-as-proxy: valid assessment design as proxy for academic integrity.	NVAO (NL), NAKVIS (SI), YODAK (TK), FINEEC (FI), PLA (PL), PEQAB (CA), NCHE (NA)

C	Explicit standard	Normative governance and a focus on accountability	AIKA (LV), A3ES (PT), SKVC (LT), HCERES (FR), , AQ (AT), AQU (ES), ACCUA (ES), ANECA (ES), EAPPA (EU), NAUVS (CZ), ANQA (AM), MAB (HU), ARACIS (RO), PAASCU (PHI), JUAA (JAP), AIAASC (US), OCQAS (CA), PEQAB (CA), NCQAA (QA), HEPDAK (TK), CNA (Chile), ANVUR (IT),
D	Operational guidance	Operational specificity and a focus on enhancement	SAAVS (SK), NAQA (UA), AZVO (HR), HEEACT (TW), HKCAAVQ (HK), CNA (CL), MFHEA (MT)
E	AI-specific provision	Adaptive governance: frameworks responding to structural changes in the threat landscape.	HAKA (EE), QAA (UK), QQI (IE), TEQSA (AUT), MQA (MY), NZQA (NZ), OAQA (OM)

Table 6: Examples of QAA across A-E types

3.4 Examples of integrating academic integrity in QA standards

In the info boxes below we present specific standards and policies from the documents of QA agencies focusing on academic integrity. In most cases, they are part of the wider framework for QA included in external QA methodologies or procedures. Most extracts avoid defining what academic integrity means, specifying instead what institutions must do (e.g. design policies, implement mechanisms, communicate expectations).

AIAASC (USA): Type C | [Accreditation Standards, AIAASC, 2021.](#)

"5.19 The institution has effective and transparent policies in place for administering, maintaining the academic integrity, and the credentialing of distance education courses and programs as offered."

"5.24 The institution publishes a formal student code of academic conduct which includes, but is not limited to, the following topics: the elements of academic integrity; the nature of plagiarism and how to avoid it; the requirements of academic assiduity, progress, and achievement; the procedures for lodging grievances and appeals; the accommodations for special needs; the responsibility to minimize one's carbon footprint and environmental impact; and a formal acknowledgement that the student knows and will abide by the code of academic conduct and all other institutional policies and procedures."

"Standard 8: Ethics and Institutional Integrity: The institution demonstrates that integrity and ethical conduct codified into written policy constitute foundational principles essential to the purpose, function, and ethos of international higher education. Guided by the core components of integrity — honesty, transparency, and action anchored to ethical principle — the institution aspires to the highest standards of conduct at each stage in its planning, policy-making, administrative, instructional, assessment, and external operations. The institution subscribes to, and actively promotes, integrity and openness in its relations with students, faculty and staff, external partners, and community stakeholders. The institution provides evidence of its commitment to integrity through the actions it takes, the character it conveys, and the impact of its endeavors."

 HEEACT (Taiwan): Type C | [Third Cycle of Institutional Accreditation Handbook \(2023–2025\)](#).

"2-1-4 The HEI has and implements the mechanisms for academic integrity."

"Materials educating students to comply with ethics and integrity when making presentations and using online resources."

"The HEI has and implements its mechanisms to support and evaluate learning integrity of graduate students."

"The HEI establishes, implements, and evaluates its learning and counseling support for extracurricular activities, campus life, lifelong learning and career development."

 AZVO (Croatia): Type D | [Quality Standards for Evaluations in the Procedure of Re-Accreditation of Higher Education Institutions](#).

"The higher education institution continuously promotes, supports and ensures ethical and transparent work, academic integrity and freedom among all stakeholders (in theory and practice) throughout the whole organisation, thus demonstrating its social responsibility."

The work of employees of the higher education institution, its students and external stakeholders, is based on ethical standards in higher education. The higher education institution effectively takes measures to prevent unethical behaviour, intolerance and discrimination. The higher education institution conducts activities related to the sanctioning of unethical behaviour, intolerance and discrimination, ensuring a fair and unbiased implementation of procedures. The system of resolving conflicts and irregularities is defined and it functions at all levels of the higher education institution."

The higher education institution encourages research into the causes and consequences of unethical behaviour, the effectiveness of measures taken to prevent it, it reports on research results and monitors trends. The higher education institution applies new technologies to eradicate all forms of unethical behaviour. The higher education institution systematically addresses issues of plagiarism, cheating and falsification of results."

 NZQA (New Zealand): Type E | [Tertiary Evaluation Indicators \(Version 2\)](#), October 2017.

"Standard: Academic standards and integrity are maintained."

"New Zealand's tertiary education sector must be credible and robust both nationally and internationally. The integrity of the NZQF depends on the sector having a good reputation, based on appropriately high academic standards. Poor standards and practice from TEOs would dilute the faith of employers, further education institutions and wider society in the value of New Zealand's tertiary qualifications. Students and stakeholders must be confident in a TEO's processes for managing academic standards. This indicator considers the processes the TEO uses for ensuring that these standards are maintained. Programme and assessment design should be appropriate to the level of the qualifications and adequately reflect the expected skills, knowledge, and attributes set out in the graduate profile of a New Zealand qualification, or with the intended programme objectives for those programmes not based on New Zealand qualifications. Academic honesty should be explicitly discussed and understood within the TEO. The TEO must consider all levels of potential misconduct (staff and student) and have robust and rigorous methods in place for detecting and addressing any misconduct. A TEO's organisational culture should encourage, support and reward the

maintenance of academic standards and behaviours that demonstrate integrity. TEOs need to continually assess the currency and effectiveness of academic misconduct policies so that students are not left with room to make assumptions about misconduct. Students should be aware of the consequences of breaching academic integrity policies. This particularly applies to the use of new technologies. Staff should also be encouraged and motivated to report dishonesty, with organisational support provided when they report it."

 NZQA (New Zealand): [Distance and Online Delivery Guidance](#)

"Assessment methods that discourage cheating are present in the mix (for example, controlled/invigilated, individualised, oral presentations, reflections)."

"Learners are required to complete a short tutorial/module re academic integrity before proceeding to the first component of the programme."

"Penalties for academic misconduct are communicated to students in plain English in the programme handbook or on the LMS."

"LMS has the following information/explanation to ensure authenticity of student work: Software used for text-matching that compares student's written work with other electronic texts from a variety of sources; Academic writing style guide, including referencing requirements."

"Oversight of key risks to operations in an online delivery context, security of the TEO's information system, including risks to academic integrity — how this will be reported, and acted upon?"

 SAAVS (Slovakia): Type D | [Standards for the Higher Education Internal Quality Assurance System](#), 2020

"The policies, structures and processes of the institution's internal system shall ensure: the maintenance of academic integrity, adherence to academic ethics, vigilance against plagiarism and other types of academic fraud, and that appropriate action is taken in response to them; that the quality level of defended final and rigorous theses is in accordance with the corresponding degree, requires an appropriate level of research, artistic and other activities and that effective detection and principled sanctions of plagiarism and other academic fraud are ensured."

"Academic fraud is a dishonest action that is contrary to academic integrity and moral standards. It includes plagiarism, cheating on tests, fabrication of research results, recording of fictitious data, omitting unsuitable facts and data, forgery of research, dishonest practices in publishing research results, not declaring conflicts of interest, misusing information gathered during reviewal, fictitious authorship, superficial and poor quality review, systematic and conscious publishing in predatory magazines and publishing houses."

 HAKA (Estonia): Type E | [Guidelines for Institutional Accreditation](#).

"8.4. Academic Ethics Standard: The higher education institution has defined its principles for academic ethics, has a system for disseminating them among its members, and has a code of conduct including guidelines for any cases of non-compliance with these principles. The higher education institution has a functioning system for handling complaints."

"Guidelines: The HEI values its members and ensures that all its employees and students are treated according to the principle of equal treatment. Employees and students of the HEI are guided by the agreed principles of academic ethics in all their activities. The HEI respects fundamental values and policies of research set out in the document, 'Research Integrity', issued jointly by Estonian research institutions, the Estonian Academy of Sciences, the Estonian Research Council and the Estonian Ministry of Education and Research. The HEI supports its students and teaching staff in their understanding and responding to ethical issues. Teaching staff and students do not tolerate academic fraud, including cheating and plagiarism, and they will act immediately upon any such occurrence. Attention is paid to the application of principles of academic ethics in the digital environment: avoidance of creative theft, the protection of intellectual property rights etc. Management of complaints from HEI members (including discrimination cases) is transparent and objective, ensuring fair treatment of all parties."

"Indicators: The percentage of student papers checked by plagiarism detection systems and the percentage of detected plagiarisms."

 HAKA (Estonia): [Requirements and Procedure for Institutional Accreditation](#)

"The members of the higher education institution follow the principles of academic ethics in the broadest sense (including those related to the use of artificial intelligence) as agreed upon within the institution. The institution supports its members in understanding and responding to ethical issues."

"Mandatory evidence: The academic ethics principles and standards established at the institution (including those related to the use of artificial intelligence)."

 MQA (Malaysia): Type E | [Institutional Quality Audit Framework \(IQAF\)](#), 2025.

"2.4.1 The HEP must establish policies and mechanisms to address validity, reliability, transparency and fairness of student assessments, consistent with relevant educational standards."

"2.4.3 (a) Review whether the HEP has a well-defined plagiarism policy that clearly explains what constitutes academic dishonesty and the consequences of violations, and how this policy is communicated to students to ensure awareness prior to undertaking any assignments or assessments. Evaluate the use of plagiarism detection tools (e.g., Turnitin)."

 MQA (Malaysia): [Guidelines to Good Practices: Assessment of Student Learning](#), 2nd Edition, November 2023

"Preventive measures and methods to address these integrity issues: i. Assignments and assessments should be designed to encourage higher-order thinking and critical analysis, which makes it more difficult for students to manner or practise academic dishonesty using AI tools. ii. Plagiarism detection software can help HEPs identify instances of cheating and ensure that students are submitting original work. iii. Instructors can randomise assessments and questions to reduce the likelihood of students sharing answers with one another. iv. HEPs must monitor student activity during assignments, and the processes from draft to final output of works must be genuinely worked on by the students themselves in the process of learning."

"HEPs must also be aware of the use of technology and artificial intelligence, which require innovative measures to ask questions that are heavily contextual to avoid plagiarism."

"It is highly commended for HEPs to advocate the use of plagiarism detection software, which is combined with the use of artificial intelligence algorithms to analyse texts and compare them to a large database of existing content, looking for similarities and matches. These tools can quickly identify instances of plagiarism and provide detailed reports to instructors, helping them to identify and address academic misconduct."

HAKA is unique in naming artificial intelligence by name within mandatory evidence requirements for institutional accreditation, while NZQA's note that academic integrity policies must keep pace with 'the use of new technologies' anticipates the AI challenge without yet naming it. MQA's 2023 guidelines represent the most practically specific treatment of AI as a challenge to assessment integrity among the agencies reviewed, moving from the detection problem to preventive assessment design in a way that parallels the leading academic literature. AZVO's emphasis on using 'new technologies to eradicate all forms of unethical behaviour' inverts the causal logic, positioning technology as a solution rather than a threat, which reflects the pre-AI framing that still characterises most Type D frameworks. The contrast between AZVO's framing and MQA's more current treatment illustrates how quickly the policy landscape is moving.

3.5 Full agency matrix

Table 3.2 presents the full classification of all 46 agencies. A selection bias in the list arises from the agencies which had visibly published their criteria in English on their websites, where information was thus more easily available.

Agency	Country	Type	Key Evidence
EUROPE			
HAKA	Estonia	E	Standard 8.4 requires AI impact assessment; mandatory evidence includes AI ethics principles and plagiarism detection indicators.
QAA	United Kingdom	E	Publication of an Academic Integrity Charter (200+ signatories); essay mill legislation advocacy (2022); ChatGPT-era guidance (QAA, 2023a; 2023b); Quality Compass (2024).
QQI	Ireland	E	Creation of the National Academic Integrity Network (NAIN); Publication of the National Principles and Lexicon (2021), Framework for Misconduct Investigation (2023), GenAI Guidelines for Educators; QQI Act criminalises contract cheating.
SAAVS	Slovakia	D	Standards explicitly define academic fraud and require anti-plagiarism systems, effective detection, and principled sanctions as accreditation conditions.

NAQA	Ukraine	D	Accreditation regulations require HEIs to define and consistently apply academic integrity policies; guidance documents are available for HEI self-assessment on integrity.
MFHEA	Malta	D	Academic Integrity included as a separate standard; publication of Guidelines for Ethical Practice and Research Integrity.
AZVO	Croatia	D	Re-accreditation standards require promotion of academic integrity, systematic action to address plagiarism, cheating, and falsification; reference is made to application of new technologies to eradicate unethical behavior.
AIKA	Latvia	C	HEI review guidelines require academic integrity principles and anti-plagiarism tools as explicit accreditation conditions.
A3ES	Portugal	C	Standards include promoting ethical principles, managing conflicts of interest, protecting data, fighting plagiarism, fraud, and pedagogical and scientific misconduct, monitoring social networks and promoting actions against violent participation therein, fighting intolerance and bullying etc.
SKVC	Lithuania	C	External evaluation methodology requires academic integrity policies; institutional review specifies integrity and compatibility of learning outcomes with academic integrity principles.
HCERES	France	C	Evaluation frameworks require institutions to have scientific integrity and ethics training policies across all study cycles; research integrity is an explicit criterion.
AQ Austria	Austria	C	Standards include research integrity requirements, reference to a Code of Conduct for Scientific Integrity.
AQU Catalunya	Spain	C	Bachelor's, Master's, PhD, and institutional accreditation guides include academic integrity and plagiarism prevention
ACCUA	Spain	C	Verification and re-accreditation guides require institutions to inform students of academic integrity obligations and assessment authenticity.
ANECA	Spain	C	Principles and guidelines embed academic integrity in evaluation processes.
EAPAA	European	C	Standards require sufficient attention to research methods, ethics, and ethics in student assessment.
NAUVS	Czech Republic	C	Requirement that HEIs act against intentional acts breaching good morals during study, in particular against plagiarism and cheat during study.

ANQA	Armenia	C	Accreditation standards combine assessment according to learning outcomes and academic integrity as a joint requirement.
MAB	Hungary	C	Academic integrity considered in relation to how QA upholds it; reference to the ESGs
ARACIS	Romania	C	Requirements about institutions adopting an Ethical Code, including provisions, violations, sanctions and measures. A dedicated Ethics Committee established which functions according to the law and adequately fulfils its mission.
ANVUR	Italy	C	Accreditation guidelines assess whether examination methods allow results to be correctly ascertained in relation to expected learning outcomes; institutions should prove the existence of antiplagiarism policies and criteria related to the Code of Ethics
HEPDAK	Turkiye	C	Standard on academic integrity, including existence of Code of Ethics
NVAO	Netherlands	B	Requirements on adequate assessment systems ensuring achievement of intended learning results. Reference to the ESGs
NAKVIS	Slovenia	B	Quality Manual addresses integrity in curriculum coherence; External Assessments Guide evaluates integrity of learning objectives.
YODAK	Turkiye	B	Guide specifies time, reliability and validity of assessment standards, as well as exam security.
FINEEC	Finland	B	External review assesses policies on how well the intended learning outcomes are achieved, validity of assessment
PKA	Poland	B	Focusing on determining the validity of how the achievement of learning outcomes achievement is assessed
AEQES	Belgium	A	No identified academic integrity provisions in accreditation criteria.
AQAS	Germany	A	No identified academic integrity provisions in accreditation criteria.
ACPUA	Spain	A	No identified academic integrity provisions in accreditation criteria.
HAHE	Greece	A	No identified academic integrity provisions in accreditation criteria.
ASIA-PACIFIC			
TEQSA	Australia	E	HESF Standard 5.2 on Academic Integrity; TEQSA Act prohibits academic cheating services (2020); sector alerts listing AI text

			spinners as cheating; comprehensive guidance on AI and academic integrity (2021, 2023, 2024a–d).
MQA	Malaysia	E	IQAF 2025 includes academic integrity dimension; Assessment of Student Learning guidelines explicitly address AI tools and require innovative AI-resistant assessment design; plagiarism policy communication required.
NZQA	New Zealand	E	Tertiary evaluation indicators include Academic standards and integrity; programme approval rules mandate academic integrity procedures; AI-specific guidance page (adapted from QQI/NAIN); distance online delivery integrity requirements.
HEEACT	Taiwan	D	Institutional accreditation standard 2-1-4 on academic integrity mechanisms; specific requirement for materials educating students on integrity; graduate student learning integrity evaluation.
HKCAAVQ	Hong Kong	D	Four-stage QA manual and Evidence Guide include assessment integrity and plagiarism policies; specific requirements for plagiarism detection; misconduct procedures as an accreditation condition.
PAASCU	Philippines	C	Academic integrity policies reflected in accreditation modules.
JUAA	Japan	C	Evaluation items address research ethics for faculty and students, as well as guidelines for ethical conduct. They also include information and digital ethics to address academic integrity issues in digital academic activities.
AMERICAS			
CNA Chile	Chile	D	Specific provisions against academic cheating services; anti-plagiarism requirements in programme accreditation; sector-level guidance on plagiarism detection and misconduct procedures.
AIAASC	USA	C	Standard on Ethics and Institutional Integrity plus student code of academic conduct requirements
PEQAB	Canada	C	Requirement in the standards that academic activity supported by policies, procedures and practices that encourage academic honesty and integrity; benchmark on academic honesty
OCQAS	Canada	C	Framework for Validation of Programs includes academic integrity descriptors; CQAAP Standards address fair student evaluation.
NACB	Belize	A	No identified academic integrity provisions in accreditation criteria.

MIDDLE EAST			
OAQA	Oman	E	ISAA Standards 2024 require maintaining academic integrity defined as ethical and undertaking all types of academic work, including receiving unacknowledged or unauthorised assistance from artificial intelligence
NCQAA	Qatar	C	Institutional accreditation: Integrity and Transparency (RC 1.3); research ethics (RC 4.3.3); student code of conduct (RC 4.1.3). Three integrity standards across the institutional audit framework.
AFRICA			
NCHE	Namibia	B	References to handling plagiarism

Table 7: Full agency description

A clear internal heterogeneity is observed within Europe, which can lead to the hypothesis that the ESG (2015) mentions academic integrity in Standard 1.1 in terms sufficiently vague to permit agencies at every level from A to E to comply. Alternatively, it can be the case that the reference to ESG leads to the application of (some sort of) standards on academic integrity despite the lack of concrete referencing as such. The EHEA Statements on Fundamental Values adopted at the Tirana Ministerial Conference in 2024 further reinforce the commitment to protecting academic integrity also through quality assurance, without sufficient time for a policy transmission chain supporting operationalisation.

Since the European region provided the most available QA methodologies in English on their websites, the heterogeneity may be explained through this contextual factor. In any case, the results are consistent with previous self-assessed results (ENQA survey in 2023) and results reported by public authorities (BPIR 2024), proving the accuracy of the desk research. However, it also implies that, with notable exceptions, the adoption of new accreditation rules based on developments in the field of AI has still been, so far, relatively slow.

Trends may be at times difficult to grasp based on different factors acting as both push and pull effects at the same time. The situation of ARACIS may be worthwhile mentioning as an example in this case. The former external QA methodology included an extremely thorough, detailed and accountability-focused indicator on academic integrity, a feature of ARACIS's indicator system dating to its original 2006 methodology.

 ARACIS (Romania): Type C | [Decision No. 915/2017 approving the external evaluation methodology, standards, reference standards, and list of performance indicators of the Romanian Agency for Quality Assurance in Higher Education](#), 2017 (repealed).

"Indicator 1.1.2. Academic Integrity"

Minimum criteria: The education provider/educational institution has a Code of Ethics and Professional Conduct for Higher Education/Academic Integrity through which it upholds the values of academic freedom, university autonomy, and ethical integrity, and has practices and applies clear mechanisms to ensure constant vigilance against potential fraud in its academic, research, or any other activities, including active measures to prevent and eliminate all forms of plagiarism, as well as to promote the principles of ethics and integrity among all members of the academic community. The education provider/educational institution continuously monitors and evaluates these practices and can demonstrate their application to all activities carried out and the involvement of students in all these processes, and the results of the monitoring are made public annually or whenever necessary. The Code of Academic Ethics and Professional Conduct/Integrity provides mechanisms and measures to ensure equal opportunities and protection against intolerance and discrimination of any kind.

Benchmark 1: The education provider/educational institution can demonstrate that the application of these practices in all processes it manages—management, education, research, etc.—has led to improved performance. The results of the evaluations conducted are recorded in annual activity reports, which are published on the institution's website.

Benchmark 2: The education provider/educational institution has a prevention-based policy regarding potential violations of the code of ethics and academic integrity, demonstrating this through public statements, studies, analyses, or measures. This includes integrating elements into the curriculum that foster student accountability in this regard, and faculty members demonstrate that they are up to date with national, European, and global developments regarding processes and techniques for preventing and combating actions that violate the norms of academic ethics and integrity.

Indicator 3.1 2. Conducting Research

Minimum Criteria: The education provider/educational institution has a code of academic ethics and integrity according to which research is conducted in accordance with professional ethical standards to ensure constant vigilance against potential fraud or breaches of professional ethics in research activities, including active measures to prevent and eliminate any forms of plagiarism. There are documents demonstrating ongoing certification of compliance with quality or excellence standards in scientific research, in terms of the organization, monitoring, and conduct of research projects, internal review of results, and the elimination of unethical practices, such as the unauthorized reproduction of results obtained by other researchers, plagiarism, and non-compliance with bioethical standards, etc.

The growing maturity of the system and a move towards a more enhancement-oriented approach led to a more concise indicator on academic integrity, despite covering in general terms the same scope and expectations. In addition, in conjunction with a stronger legal framework for academic integrity (including mentioning the QA of academic integrity), maintaining the level of detail of indicators in the QA methodology was deemed superfluous.

 **ARACIS (Romania): Type C** | [Decision No. 962/2024 on the approval of the Methodology for the External Evaluation of the Quality of Education in Higher Education](#)

Indicator I.P.C.1.1.3 The higher education institution (HEI) approves and incorporates into the Code of Academic Ethics and Professional Conduct the rules governing academic ethics and professional conduct, descriptions of violations, sanctions, and necessary measures, in accordance with the law.

Indicator I.P.C.2.1.2 The HEI has established a University Ethics Committee, within which a subcommittee dedicated to research ethics is formed.

Indicator I.P.C.2.2.2 The University Ethics Committee operates based on regulations approved by the university senate and acts independently of any other structure or person within the higher education institution, in compliance with the law.

ARACIS (Romania): Type C | [Specific quality standards regarding the conduct of activities related to full-time undergraduate degree programs, differentiated by field of study](#)

The curriculum for the undergraduate degree program includes a course on academic ethics and integrity, which also addresses research ethics.

When using specific electronic, IT, and communication resources in formative assessment activities, the HEI and the organisation providing education must ensure a safe and secure assessment environment by using IT platforms that guarantee the protection of personal data and prevent unauthorized access, as well as the ability to verify the originality of work produced during the assessment.

3. Structural gaps

The comparative analysis reveals six structural gaps in the current global distribution of the QA of academic integrity in the context of AI. Each gap is analytically connected to the implicit theory of the QA function embedded in the relevant provision type and implies a specific policy direction for agencies seeking to progress.

Gap	Description	Recommended Action
1	Type A prevalence: 11% of agencies with no provision on academic integrity, including well-resourced systems	INQAAHE could consider reinstating a baseline expectation on academic integrity (removed in the 2025 revision) equivalent to at least Type C provision QA agencies could integrate specific standards on academic integrity – either explicitly or, if not possible for whatever reason, through the validity/reliability of learning outcomes assessment
2	Type B→C transition: agencies with implied integrity have not converted assessment quality requirements into explicitly named integrity standards	QA agencies should name academic integrity explicitly in accreditation standards and reference an authoritative definition, drawing on an existing national-level legal definition where one is available (as in Romania) or, if not available, an internationally recognised source such as NAIN's. They should move directly to Type C with AI language included.
3	Definitional gap: overwhelming majority of agencies do not define what academic integrity means in their frameworks	INQAAHE could consider developing or embracing a global lexicon for all members to adopt, potentially in cooperation with global governance bodies (e.g., UNESCO, OECD).
4	Type C→D translation gap: agencies having	After achieving Type C, QA agencies could develop guidance toolkits (TEQSA/QAA/QQI serving as models). INQAAHE could consider opening a guidance library to support member adaptation and better promoting the Toolkit.

	explicit standards but no operational instruments	
5	AI blind spot: 9 out of 10 agencies have no AI-specific provision; the fastest-growing integrity threat has the lowest policy coverage, and pre-2022 frameworks dominate	QA agencies could avoid creating standards that immediately need updating and incorporate the QA of academic integrity covering AI but without overly detailed language.
6	Data deficit: 78% of systems have no accessible misconduct database (ENQA survey); sector intelligence operates without an evidence base	QA agencies could require aggregate misconduct data in annual quality reporting. INQAAHE could consider including questions on data collection in regular QA trends surveys

Table 8: Structural gaps identified

Section 4: Generative Artificial Intelligence and Academic Integrity

More than simply a technological update on the challenges that came before it, the challenge that generative artificial intelligence poses to academic integrity is a structural one. Every previous academic integrity threat, from copying passages without attribution to purchasing a bespoke essay from a commercial service, required either a detectable trace or a financial transaction that could, in principle, be disrupted. Generative AI produces original, novel text in seconds, leaves no bibliographic fingerprint, is available at zero or minimal direct cost to the user, and is embedded in the same software tools that institutions encourage students to use. This combination of properties can expose the foundational assumptions regarding the assessment of learning outcomes as inadequate.

4.1 Properties of GenAI that change the paradigm for academic integrity

Four structural properties distinguish generative AI from every preceding academic integrity threat, and each carries a distinct policy implication.

The first is *accessibility*. Previous cheating technologies required either specialist knowledge, financial investment, or both. Text-matching software, before it became universal, was available only to institutions. Commercial essay mills require money and the willingness to initiate a financial transaction, which itself creates vulnerability and risk for the student.

Generative AI tools require only a browser and basic literacy. They are built into word-processing packages that students use legitimately for legitimate work. In practical terms, the cost of attempting AI-enabled misconduct has fallen to zero, while the effort required has been reduced to the ability to frame the question (prompt) properly.

The second is *invisibility to existing detection infrastructure*. Plagiarism detection works by comparing text against indexed sources and identifying matches. AI-generated text, by definition, is not copied from any source. Even existing software claiming to predict AI-generated text through patterns, tics and quirks in language has been proven fallible.

The third is *quality*. There is a widespread assumption in the policy community that AI-generated text is detectable by a trained academic eye, that it lacks depth, contains hallucinations, or reads as generically fluent but intellectually thin. This assumption is increasingly unreliable, as the quality threshold for AI-generated work across many standard assessment tasks has moved above the passing grade, and students who have learned to prompt AI tools effectively, to edit and personalise their outputs, and to combine AI-generated content with their own additions produce work that resists confident identification by both human reviewers and detection tools. This raises a genuine definitional question: skilled, transparent, and disclosed use of AI as a drafting or research aid may constitute legitimate learning, potentially more so than traditional forms of unauthorised collaboration such as copying a peer's work. The quality assurance challenge is therefore obviously not to prohibit AI engagement, but to ensure that assessment design can distinguish legitimate, disclosed AI-assisted learning from undisclosed substitution of a student's own work. The implication is that assessment tasks which were designed as proxies for learning are no longer functioning as such in a significant proportion of cases.

The fourth is *interactivity*. Compared with a 'classical' computer, AI tools can serve as a collaborative partner across the full arc of an assignment: suggesting a structure, generating a draft, responding to the student's revisions, improving the argument, and polishing the prose. This interactivity means the distinction between the student's work and the AI's work is not binary but a spectrum, creating genuinely difficult questions about authorship and authentic learning that have no clean precedent in integrity policy.

4.2 The Three-AI framework: intersections and implications

The ENQA Working Group on Academic Integrity (ENQA, 2024) proposed a conceptual framework that maps the current challenge at the intersection of three components, each abbreviated as 'AI': Artificial Intelligence (the technology itself), Academic Integrity (the values and commitments of honest scholarship), and Assessment Integrity (the validity and reliability of student evaluation processes). While each element can be considered independently, the analytically significant space is the zone where they overlap, where the technology, the values, and the measurement system interact simultaneously. It is this intersection that defines the real challenge for quality assurance agencies, and it is here that policy must be developed if it is to be effective.

Where *artificial intelligence and academic integrity intersect*, the central tension is between the availability of a tool that can produce plausible academic work and the foundational expectation that students demonstrate their own understanding, apprehension and application. This intersection creates two distinct sub-problems: intentional misuse, where a student knowingly submits AI-generated work as their own, and unintentional boundary violations, where a student uses AI tools in ways that institutions have not yet clearly defined as acceptable or unacceptable. The distinction matters for policy design – whereas intentional misuse calls for clear policy, proportionate sanctions, and fair investigation processes, unintentional violations call for training, clarity in guidance, and a recognition that institutional responsibility cannot simply be discharged by pointing to an outdated policy document. A QA framework that embeds academic integrity as an accreditation criterion must require institutions to demonstrate that they have addressed both dimensions: not merely that a policy exists, but that it has been communicated, that it specifically addresses AI, and that students have been educated about what it means.

Where *artificial intelligence and assessment integrity intersect*, the problem is not primarily about student dishonesty but about measurement validity. If standard written assignments can be completed to a passing standard by a generative AI tool without meaningful student engagement, then those assignments are not measuring what they purport to measure. This is a quality problem independent of any question of intent or misconduct. Applying a framework developed in the academic literature (Bens, 2024), adapting assessment to AI implies coordination choices related to changing the conditions for assessment (the evaluation situation), the ability for assessment (what students can prove) or the value of assessment (the nature of assessment).

It requires QA frameworks to ask not only whether an institution has an academic integrity policy but whether the assessments it uses are still valid indicators of student learning outcomes in a world where AI can produce competent proxy artefacts for many standard task types. This reframing moves the quality assurance conversation from the detection of individual misconduct to the systemic validity of assessment design, a much larger and more productive scope, and, more fundamentally, to the continued relevance of the learning outcomes themselves: where a learning outcome can be substantially achieved by an AI tool with minimal human input, particularly outcomes centered on information reproduction or recall, its pedagogical value and its retention within programme design may need to be reconsidered, not merely its mode of assessment.

Where *assessment integrity and academic integrity intersect*, the equity dimension also comes into play. Surveillance-heavy responses to AI-enabled misconduct, particularly the deployment of AI detection tools to flag suspicious submissions, create asymmetric risks. Students who write in English as a second language, whose academic prose does not conform to the stylistic norms on which detection tools are calibrated, or whose institutions have not informed them on how detection tools work and what constitutes unauthorised AI use, face a disproportionate risk of false accusation. At the same time, commercially sophisticated users of AI tools, or students with the resources and knowledge to edit AI outputs to defeat detection, face a lower detection risk than their less privileged peers. In this

sense, quality assurance frameworks must require institutions to demonstrate fairness in their processes, not merely consistency.

The table below shows the intersection between the understanding of artificial intelligence, academic integrity and assessment integrity.

AI × Academic Integrity	AI × Assessment Integrity	Academic × Assessment Integrity
Risk: GenAI enables intentional and unintentional misconduct without triggering plagiarism definitions. Policy response: AI-specific policy covering acceptable and unacceptable use; student training on boundaries; emphasis on authentic learning over product delivery. QA role: Require institutions to have AI-specific academic integrity policies, with evidence of communication to students and staff.	Risk: Standard assessment tasks can be completed to a passing standard by GenAI without student engagement, invalidating assessment as a proxy for learning. Policy response: Systemic assessment redesign toward authentic, process-based, multi-modal tasks; AI literacy as a graduate attribute. QA role: Require institutions to review and redesign assessments with reference to AI; include assessment validity as an explicit quality indicator in accreditation.	Risk: AI detection tools produce false positives and false negatives; differential AI access creates inequity in both opportunity and risk of misidentification. Policy response: Prohibition of AI detection as sole evidentiary basis for misconduct findings; equity impact assessment embedded in assessment design; strong appeals mechanisms. QA role: Require fair, proportionate misconduct processes; prohibit sole reliance on detection tool outputs as grounds for misconduct findings.

Table 9: The Three-AI Framework applied to QA (adapted from ENQA, 2024)

4.3 The detection problem regarding AI tools

The initial instinctive institutional response to the emergence of AI-enabled misconduct has been to look for a technological countermeasure. The core technical limitation is that AI detection tools attempt to classify text whose statistical properties substantially overlap between human and machine writers (TEQSA, 2024a). They cannot identify the process by which text was produced, but only make probabilistic inferences from the text itself. The result is a tools landscape characterised by high false positive rates and significant vulnerability to circumvention by students who edit AI outputs, combine AI and human writing, or use prompting strategies specifically designed to produce text that defeats detection algorithms.

When an AI detection tool incorrectly identifies a student's genuine work as AI-generated, the result is a misconduct allegation against an innocent person. The reputational, psychological, and academic consequences of such an allegation can be severe, particularly for students who lack the confidence or institutional knowledge to contest it effectively. The groups most vulnerable to false positive identification, includes , students whose academic writing style is non-standard, and students who have used AI tools for permitted purposes such as grammar

checking. A quality assurance framework that requires or implicitly endorses AI detection as a primary enforcement mechanism is not simply technically inadequate, but it is potentially discriminatory in its effects.

This does not mean that technology has no role in academic integrity governance. Text-matching software, used formatively to support academic writing development, has a well-established educational value. The issue is rather the over-reliance on detection as a substitute for the more fundamental work of redesigning assessments and building academic integrity cultures. Quality assurance agencies occupy a strategic position in this regard, by explicitly signaling in their accreditation criteria and guidance that AI detection tools cannot substitute for robust assessment design and by redirecting institutional energy to authentic educational reforms.

4.4 Generative AI and contract cheating

When generative AI tools became widely accessible, a reasonable hypothesis was that they would undercut the commercial contract cheating industry. Practice suggests, however, that the two phenomena are coexisting and, in some configurations, combining, with implications for the scale and nature of the threat to assessment integrity.

The persistence of commercial cheating services reflects rational student calculation about risk and quality. Essay mills offer human-produced, tailored work with a degree of accountability that (free) AI tools do not provide. Among other things, they sometimes offer discipline-specific expertise, and, in any case, experience elaborating an argument and using the format that assignment evaluators expect. Particularly for high-stakes assessments, such as final-year dissertations, the perceived reliability advantage of a paid service over a free AI tool remains significant for students who have decided to cheat. The commercial industry has also adapted hybrid services that combine AI-generated drafts with human editorial review, at the same time harder to detect than either AI-generated or purely human-produced commissioned work.

The deeper concern is that the commercial cheating industry has become actively predatory toward the students. TEQSA's 2024 sector alert documented that cheating services are increasingly using clients' personal data for blackmail and identity theft, contacting students who have used their services with threats of exposure unless further payment is made. QAA (2022) documented the same pattern in the UK context. These practices represent a serious student welfare issue, with students exploited by criminal enterprises that operate with near-impunity across jurisdictions.

For policy design, the coexistence of AI-enabled and commercial misconduct means that a framework addressing only one dimension is incomplete. An institution might develop sophisticated AI-aware assessment design while doing nothing to address the commercial cheating services targeting its students; conversely, strong anti-contract cheating policy and practice does not address the challenge of assessing student learning in conditions where AI tools are ubiquitous. Both threats are structural features of the current higher education environment, and both require dedicated policy attention.

4.5 Assessment redesign as the structural response

There is a strong convergent consensus that the most productive institutional response to generative AI is the redesign of assessment, even more so as the connection between assessment design and cheating is irrefutable (Openo, 2024). In the context of both AI and contract cheating, the only way to restore assessment's function as a genuine proxy for student learning outcomes achievement is to design assessments that AI tools cannot adequately complete without meaningful human engagement.

The assessment types that are most resistant to AI substitution share several characteristics: they are personalised to the student's own experience, the disciplinary context, or the institutional situation; they assess the process as well as the outcome, requiring students to document their thinking, show drafts, or explain their reasoning in real time; they involve an oral or interactive component that requires the student to demonstrate live understanding of submitted work; and they operate at program level, creating a coherent assessment arc that triangulates evidence of learning across multiple points rather than relying on a single submission. None of these characteristics is new to the design of appropriate assessments. However, their implementation is resource-intensive and becomes progressively more difficult as cohort sizes grow. In this respect, Romania's regulatory limits on class and cohort sizes represent a comparative advantage that could facilitate the adoption of more personalised, process-oriented assessment forms, an advantage not available to systems with large, unregulated intake numbers. The emergence of AI has only proven that what higher education institutions had been doing before was neither appropriate for the purpose given, nor in line with the Bologna commitments.

The shift has significant resource implications. Authentic, personalised, process-oriented assessment requires more staff time to design and evaluate, while oral assessments are not scalable to large cohorts without investment. In this sense, QA criteria on assessment design must be accompanied by capacity-building support (guidance, exemplars, peer networks).

For agencies like ARACIS, operating in systems where learning outcomes had not been a central lens for programme design in the past, the shift toward AI-resilient assessment criteria represents both a challenge and an opportunity. It is a challenge because it requires developing evaluators' capacity to assess assessment design quality, and an opportunity because enhancing the importance of assessment validity as an accreditation criterion simultaneously addresses the AI threat to academic integrity and drives broader quality improvement in teaching and learning.

Principle	What it Requires	QA Implication
AI literacy as a graduate attribute	Assessment explicitly requires critical, ethical engagement with AI tools aligned with disciplinary or professional values; AI use is	Accreditation criteria should require programmes to articulate, where applicable, graduate AI literacy outcomes and demonstrate how they are assessed across the programme.

	taught and assessed, not merely regulated.	
Process over product	Assessment weight attached to documented stages of learning, drafts, reflections, research logs, not only to the final submitted document.	QA frameworks should require evidence that assessment design rewards process and authentic engagement.
Authentic and personalised tasks	Tasks grounded in the student's own experience, disciplinary context, or current events, making substitution by generic AI output implausible.	Accreditation criteria should assess authenticity and personalisation of assessment design as quality indicators.
Oral and multi-modal components	Written submissions supplemented by oral examination, viva, or interactive presentation that verifies student understanding beyond the written document.	QA guidance should recommend oral assessment as a mechanism for verifying learning at critical programme exit points.
Programme-level design	Assessment strategy designed coherently across a programme to avoid over-reliance on a single assessment type.	Accreditation frameworks should require program-level assessment maps demonstrating coherence across the full programme.
Equity and accessibility	Assessment design accounts for differential AI access, language diversity, and the risk that detection responses disproportionately affect non-native speakers and under-represented groups.	QA standards should require equity impact assessment in assessment design and fair process in misconduct investigations.

Table 10: Assessment design principles for the GenAI era (synthesised from TEQSA, QQI, QAA)

Western Sydney University: Approach to assessment transformation

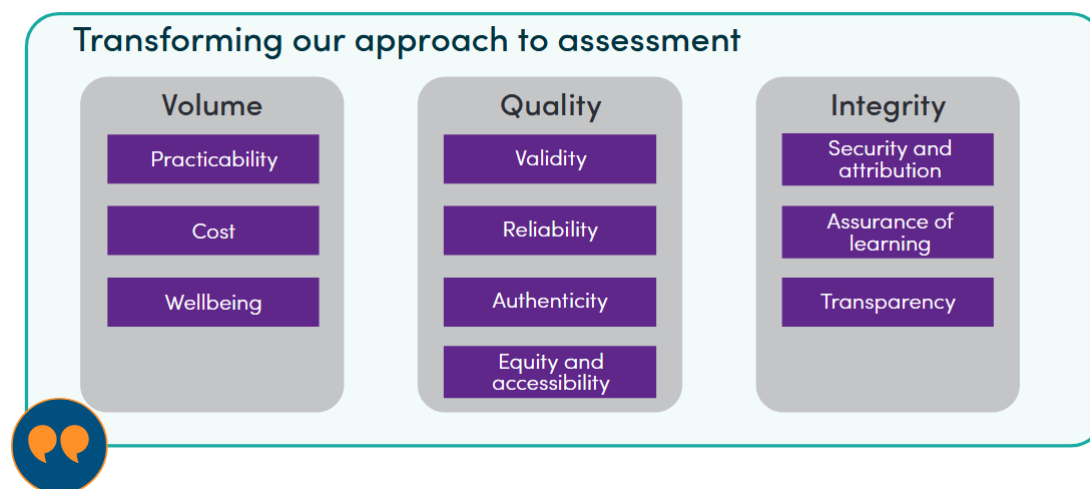


Figure 3: Institutional example of assessment transformation (TEQSA, 2024)

4.6 Systemic drivers of misconduct and the limits of a compliance-exclusive approach

A recurring finding in the academic integrity literature is that misconduct is less a product of individual moral failure than of structural conditions that raise its perceived benefits relative to its perceived costs and risks. The drivers documented across decades of research include assessment deadlines clustered in ways that create acute time poverty; competitive labour market pressure to achieve the highest possible grades; massification and the estrangement of international and non-native language students from institutional support networks; grade inflation and its role in granting scholarships or other benefits; assessments whose design creates abundant opportunity without meaningful risk; and institutional cultures that treat students as consumers to be retained.

The implication is that a compliance-only response, such as updating policy documents to prohibit AI use and deploying detection tools to enforce the prohibition, addresses neither the root drivers of misconduct nor the structural conditions that make detection inadequate. The framework proposed by Glendinning (2017) for assessing institutional academic integrity cultures identifies seven characteristics that distinguish genuinely effective academic integrity governance from superficial policy compliance: strategic and sustained leadership; proportionate deterrence; robust policies and academic regulations; coherent programme and assessment design; an institutional culture that values deep learning; active student engagement and leadership; and transparent communication of outcomes. Each of these characteristics can be assessed through external quality review and is relevant to the AI challenge. A QA framework that examines only three of these characteristics (whether policies exist, whether sanctions are specified, whether procedures are documented) will systematically fail to identify institutions whose cultures normalise dishonesty.

While older, the IPPHEAE data (2013) found a cultural tendency in Romanian higher education to treat students as paying customers whose retention takes priority over rigorous enforcement. This is a cultural configuration that, when combined with the accessibility of generative AI tools, creates the highest risk. An institutional culture in which students were seldom penalised for plagiarism enforces a marginal decision to use AI tools inadequately. To tackle this, ARACIS can strengthen enforcement of its existing requirement for demonstrable evidence of functioning academic integrity policies, such as published data, staff training records, student engagement in academic integrity initiatives, and assessment design that assesses genuine learning.

Section 5: QA agency responses to Generative AI – the main practice

Only a small number of QA agencies have moved from awareness of the AI challenge to embedded policy action. In most cases, they used the tools already available to them (guidance notes, sector alerts, interpretation of existing standards) to begin shifting the institutional landscape while the longer-term question of formal standard revision was being worked through. This approach, deploying existing levers quickly while building the case for structural change, offers a practical model for agencies operating in contexts where formal policy processes are slow and the academic integrity challenge is immediate.

5.1 Australia: TEQSA's regulatory model

TEQSA's approach to academic integrity governance is, by some margin, the most comprehensive among the QA agencies studied. Its distinctiveness lies not in any single instrument but in the integration of multiple reinforcing mechanisms: binding regulatory standards, a suite of accessible guidance resources, statutory enforcement powers against commercial cheating services, and a sector-wide action plan process that holds every Australian higher education provider to account on a defined timeline. Understanding why this model works requires understanding the legal architecture within which TEQSA operates.

Australian higher education providers are legally required to meet the Higher Education Standards Framework (Threshold Standards), which includes Standard 5.2 on Academic Integrity. Compliance with them is a condition of registration, and failure to demonstrate compliance can result in the imposition of conditions, the refusal of registration renewal, or deregistration. The Tertiary Education Quality and Standards Agency Act, as amended in 2020, additionally creates criminal and civil penalties for providers of commercial academic cheating services, giving TEQSA a law enforcement role that no European QA agency possesses to the same extent. This legislative backing transforms the stakes of non-compliance from reputational to legal, creating further incentives.

What makes TEQSA's post-ChatGPT response particularly instructive is the speed and intelligence of its translation of the regulatory framework into operational guidance. TEQSA updated its interpretation of existing Standards through a revised Guidance Note (2024d),

signaling to institutions that the expectation to evolve training, policies, and procedures in response to AI was already embedded in current requirements. This is a subtle but powerful move which avoided the delay of formal legislation while creating clear accountability. Alongside this, TEQSA commissioned external expert collaborations to produce the Assessment Reform for the Age of Artificial Intelligence document (TEQSA, 2023), which gave institutions a credible, evidence-based starting point for the pedagogical work required.

Sector alerts on the predatory evolution of commercial cheating services, a comprehensive emerging practice toolkit for institutional AI strategy, and an action plan framework requiring governing body endorsement and measurable outcomes completed the package.

Several features of the TEQSA model are worth highlighting for agencies seeking to adapt it. The requirement for the institutional governing body's endorsement of AI action plans is significant as it lifts academic integrity from a purely academic quality concern, making senior leadership accountable. The action plan framework's insistence on specific, measurable outcomes with clear deadlines is also worth mentioning, as is the combination of guidance resources that are free, publicly accessible, and practically oriented.

Monash University: AI readiness self-checklist

AI Readiness Self-Check Questions (Diagnostic Tool) Questions for the Chief Examiner, who is responsible for the assessment regime, to self-check their AI confidence/readiness and to plan their risk mitigation strategy as required.	
<Add Unit/Course # & Name>	
Prepared by <Add name>	
Worksheet: To self-assess the readiness of your assessment design in the age of generative AI, rate the questions below on a scale of 1 to 3, where: 1 = High AI Confidence/Readiness; 2 = Moderate AI Confidence/Readiness; 3 = Low AI Confidence/Readiness	
Rating	Issue
	1. How well do the current course learning outcomes (CLO) accommodate learning with AI and collaborating with AI to complete assessment tasks? (Is there enough flexibility and scope in the course learning outcomes for technologies such as AI to be incorporated into the units?)
	2. How appropriate are the current unit learning outcomes (ULO) in the course for the unit and the future directions of the profession/discipline that they support?
	3. Within the core units of the course, are the current unit learning outcomes (ULO) able to accommodate learning with AI and collaborating with AI to complete assessment tasks and/or do the ULO clearly identify where humans need to demonstrate knowledge and skills without any AI assistance?
	4. How confident are you that the assessment items in all units of the course adequately support the stated unit learning outcomes?
	5. Approximately, what proportion of the units in the course use a diversity of assessment tasks to confirm learning outcomes? This includes a varied mix of high and low stakes assessments.
	6. Approximately, what proportion of the units rely on heavily weighted final essay submissions, exams or hurdles?
	7. Approximately, what proportion of the units in the course are currently supporting learning with AI (in assessments) or learning about AI (in either assessments or teaching activities)?
	8. How confident are you that the assessments have been designed with adequate security to minimise the risks of students engaging in academic misconduct (plagiarism, collusion, and inappropriate use of AI)?
	9. How vital of a role will AI be for potential professions secured by graduates of this course?
	10. Are the contributors to the course prepared and willing to adapt the course as AI becomes more prevalent in educational tools and practices?
TOTAL:	Preliminary AI readiness score: 7-11= not at all ready; 12-16 = a little ready; 17-21 = mostly ready; 22 - very ready



Figure 4: Learning outcomes AI-readiness self-check example (TEQSA, 2024)

5.2 United Kingdom and Ireland: QAA and QQI's collaborative governance model

The UK and Irish experience demonstrate a different model of effective QA response: one based less on statutory enforcement and more on the sustained deployment of sector leadership, network convening, and well-timed, well-designed guidance. QAA and QQI operate without TEQSA-equivalent enforcement powers, and yet their contribution to the field has been equally substantial and internationally influential.

QAA published soon after the AI hype clear, accessible guidance within six months of ChatGPT's public appearance. QAA made two things simultaneously visible: that the challenge was real and required institutional action, and that the appropriate response was a thoughtful review of policy, assessment design, and student experience. This framing shaped the institutional response across the UK sector in ways that, considering the institutional culture of UK and HEI's, no enforcement action could have achieved at the same speed. The two guidance documents, one addressing immediate policy questions and the other proposing a longer-term developmental approach to assessment, reflect a combination of crisis management and structural reform. Furthermore, QAA followed up and asked HE providers to identify if their advice was helpful, effective and up to date.

QQI's contribution operates primarily through the infrastructure of the National Academic Integrity Network, which it convenes and coordinates. The NAIN is analytically important because it represents a model of academic integrity governance that distributes responsibility across institutions while maintaining national coherence and legal backing. While QQI is also involved in other streams of action, with The Qualifications and Quality Assurance Act criminalising contract cheating services and giving QQI legal powers to bring cases to court, NAIN's multi-stakeholder membership brings a different approach, which ensures that guidance speaks to the full range of people who encounter academic integrity issues in practice. The GenAI Guidelines for Educators, developed through this network, address four distinct audiences (all academic community members, educators, programme leaders, and students) reflecting a whole-of-institution approach and understanding of academic integrity. QQI successfully created an ecosystem fostering academic integrity that relies on legislation, policy, practice, bodies and funding. Other initiatives linked to academic integrity in Ireland include the identification of academic integrity as a funded area by the Irish Higher Education Authority (HEA) Strategic Alignment of Teaching and Learning Enhancement Funding in Higher Education and the inclusion of a section on academic integrity in the annual student survey StudentSurvey.ie (Hackett et al., 2024).

The transferability of the QQI/NAIN model is demonstrated by the fact that NZQA adapted NAIN materials for the New Zealand context, and that NAIN's terminology framework has been referenced by agencies in multiple jurisdictions. The investment in publicly available, open, practically oriented guidance resources is therefore not merely an act of national service but a contribution to the global QA knowledge common space. This is a model that other INQAAHE member agencies can draw on directly, adapting materials that have already been developed, validated, and distributed.

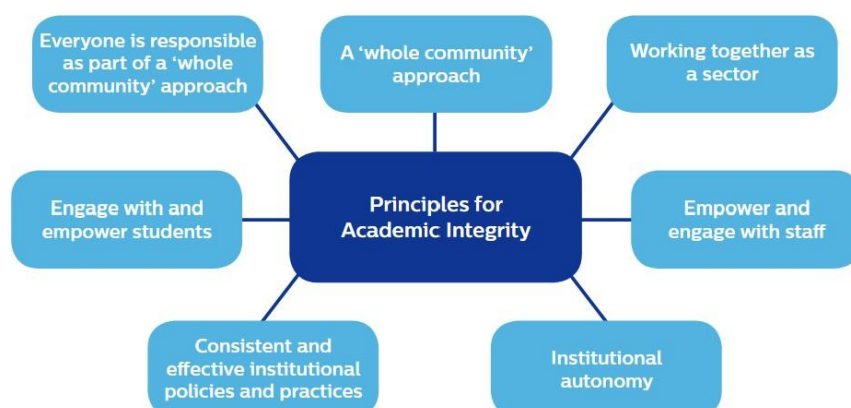


Figure 5: Principles for academic integrity (QAA)

Potential assessment strategy in relation to Gen AI	Approach to assessment design	Challenges to adopting this approach
Avoid	Revert to in-person exams where the use of AI is not possible.	This moves away from authentic assessment and creates many logistical challenges.
Outrun	Devise an assessment that AI cannot do.	AI is advancing rapidly and given the time between the assessment being set and it being taken, AI might well be able to do the assignment when it is taken.
Embrace and adapt	Embrace the use of AI, discuss the appropriate use of AI with students, and actively encourage its use to create authentic assessments.	Balancing authentic assessment and the use of generative AI with academic integrity is a challenge.

Figure 6: Approaches to assessment redesign based on AI developments (QAA, 2024)

5.3 Estonia: HAKA and including AI in standards

HAKA has embedded AI-specific requirements in its accreditation standard without requiring legislative change or a major change of its evaluation methodology. HAKA's Standard 8.4 on academic ethics requires higher education institutions to demonstrate three things: that they have defined principles for academic ethics and a system for ensuring they reach all members of the academic community; that they have a code of conduct for academic practice that specifically addresses the use of artificial intelligence; and that they have mechanisms for responding to violations of those principles. This three-part architecture (define, disseminate, respond) is analytically coherent, and naming AI sends a clear signal to institutions that they cannot discharge their obligations with a generic academic honesty policy.

5.4 Malaysia: MQA and systematic breadth of academic integrity

MQA and NZQA represent the Asia-Pacific contributions to leading-edge practice, and each illustrates a distinct aspect of effective QA integration. Malaysia's MQA is notable for situating academic integrity within a broader national anti-corruption governance framework, treating the integrity of student assessment as a component of the institutional governance integrity that Malaysia's public accountability structures require. This integration gives academic integrity an institutional standing that purely academic-administrative treatments do not: when a governing body is accountable for institutional integrity across all governance domains, academic misconduct is not a technical quality matter to be managed by the registry but a governance risk to be addressed at the highest institutional level. MQA's Institutional Quality Audit Framework 2025 includes explicit requirements for AI-aware assessment design and anti-plagiarism systems, reflecting the integration of the two dimensions identified in Table 4.1 as requiring parallel attention.

5.5 Cross-agency lessons and emerging standards

Across the desk research, ten consistent standards can be identified that characterise the practice of QA agencies engaged in mature AI-era external quality assurance of academic integrity.

No.	Standard
1	Include AI-specific provisions in formal accreditation criteria, particularly in relation to academic integrity & student assessment (<i>potentially also related to using AI in learning and teaching, governance in general</i>)
2	Do not expect reliance on AI detection tools as a solution for student assessment or proof of academic misconduct
3	Issue sector alerts on emerging threats from commercial cheating services and/or AI
4	Require program-level student assessment review with AI-resilience as an explicit criterion
5	Establish or convene a national academic integrity network
6	Adapt and redistribute open guidance materials from peer agencies
7	Advocate for legislation against commercial academic cheating services
8	Require AI literacy as a programme-level learning outcome

9	Collect and publish sector-level data on academic misconduct trends
10	Require institutional governing body accountability for academic integrity and AI governance
11	Periodically review and, where necessary, adapt learning outcomes that can be substantially satisfied by AI tools with minimal human input, giving increased weight to socio-emotional and interpersonal skills that remain distinctively human.

Table 11: Proposed standards related to QA and AI

Section 6: Beyond the Accreditation Cycle: Other Ways QA Agencies Support Academic Integrity

The QA of academic integrity cannot be reduced to what happens in formal accreditation procedures. The fact that of more than 90% of reviewed QA agencies operating with QA frameworks designed before the emergence of AI is not simply a matter of bureaucratic inertia, but actually reflects several genuine structural challenges. Formal accreditation standard revisions are slow processes requiring consultation and approval, while agencies in smaller or less resourced national systems lack the staff capacity to develop comprehensive guidance ecosystems. Many agencies do not have the legal authority to enforce standards in ways that create binding consequences, and in contexts where national data on misconduct prevalence is absent, the political case for investing limited political attention may be difficult to make.

One particular issue we identified in this case is the circular nature of the data deficit. Most agencies do not require institutions to report misconduct rates or trends systematically. Without such reporting requirements, aggregate national data does not exist; which leads to the scale of the problem not being demonstrated. Consequently, the political case for mandatory standards is harder to make.

Nevertheless, the most visible and consequential QA agencies' activities in the academic integrity domain occur between accreditation cycles: in guidance publications, sector alerts, convened networks, professional development programmes, legislative advocacy, and international collaboration. Understanding this broader portfolio of activities is important both analytically and practically. Analytically, it reveals that agencies have more levers available to them than accreditation standards alone suggest. Practically, it means that agencies at an early stage of developing their formal accreditation criteria for academic integrity can begin making a real contribution to sector culture immediately, through instruments that require no formal standard revision. This section maps the full range of these instruments, drawing on the evidence of what leading agencies have done, and proposes a framework for understanding their relative impact.

6.1 Sector intelligence, alerts, and protective communication

One of the most underused instruments in the QA agency toolkit is the sector alert: a rapid, targeted communication to institutions about an emerging threat that requires immediate attention. The sector alert is protective rather than an enforcement mechanism. Its purpose is to ensure that institutional leaders, quality departments' staff, and academic staff have timely information about risks that their own monitoring processes may not have detected. In the academic integrity context, the emergence of generative AI tools and the evolution of the commercial cheating industry toward increasingly aggressive and predatory practices are precisely the kinds of developments that warrant sector alerts, since they are developments that are happening faster than formal policy revision cycles and that carry significant consequences for students and institutions that are unaware of them.

For example, TEQSA's 2024 alert on changes in commercial academic cheating service activities documented the shift toward blackmail and identity theft by service providers. TEQSA's earlier guidance note on substantiating contract cheating for symbol-dense and logical responses addressed a specific operational challenge for institutions trying to build evidence in misconduct cases, demonstrating that sector intelligence can be highly technical and operationally specific rather than merely policy-level (TEQSA, 2021). Together, these instruments constitute a sector intelligence function: an ongoing monitoring and communication activity that keeps the sector informed of what is happening in the integrity threat landscape.

The CHEA/CIQG inventory of knowledge and actions on combatting academic corruption, developed following the 2016 Advisory Statement, provides a model for how the outputs of sector intelligence can be systematised and shared internationally (CHEA, 2019). The inventory documents practices across accreditation and quality assurance bodies globally, creating a searchable evidence base that agencies can draw on when developing their own responses. It represents a form of collective sector intelligence: rather than each agency developing its monitoring and response capacity independently, the inventory allows agencies to benefit from the documented experience of their peers. INQAAHE is positioned to perform this function for its global membership in a way that no individual national agency can; the toolkit approach (INQAAHE, 2020) is a step toward this but requires sustained investment to become a living resource that reflects current developments. For ARACIS, sector intelligence, such as timely sector alerts to institutions about emerging contract-cheating or AI-misuse patterns, is also among the most immediately actionable instruments available.

6.2 National networks

A durable and scalable mechanism through which QA agencies have shaped academic integrity practice is the convening of national networks that create the infrastructure for ongoing knowledge exchange, shared guidance development, and cultural change. The QQI National Academic Integrity Network in Ireland is a clear example. Sometimes those networks are activated at state level, such as in Canada (Academic Integrity Council of Ontario, the Manitoba Academic Integrity Network, the Alberta Council on Academic Integrity).

Network convening creates several effects that formal accreditation cannot. It produces shared terminology (e.g. QQI's (2021a) National Principles and Lexicon of Common Terms) and demonstrates the value of definitional clarity as a foundation for policy development. Furthermore, it creates communities of practice among institutional practitioners, who benefit from peer learning that no formal guidance document can fully substitute for. It generates a collective evidence base where network members share policy developments and evaluation findings. Since it creates a channel through which agency guidance can be developed collaboratively rather than being imposed from above, the likelihood that it will be adopted increases.

Glendinning's cross-European analysis of responses to student plagiarism in higher education identified network infrastructure as one of the most consistent distinguishing features of systems with demonstrable progress in academic integrity governance (Glendinning, 2020). Systems that had developed national or regional practitioner networks consistently outperformed those that had not on the operational dimensions of academic integrity governance. This finding reinforces the argument made in Section 2 that the gap between policy documentation and operational culture is a central quality assurance challenge in this domain, with networks among the most effective instruments for closing it.

6.3 Professional development and evaluators' capacity building

The quality of any accreditation process is ultimately a function of the capacity of the people who conduct it. This is particularly relevant in the academic integrity domain, where the evaluation of institutional culture as distinct from the review of policy documentation requires a set of analytical competencies that many evaluators have not been trained to deploy. The shift requires evaluators who understand what a functioning institutional culture looks like, who can probe beyond presented documentation, and who can distinguish between institutions whose integrity systems are genuinely working and those generating compliant documentation in the absence of cultural change.

Glendinning's important insight about the relationship between quality assurance and academic integrity (that QA agencies have a role not only in verifying what institutions do but in shaping what they aspire to and invest in) depends on evaluators who can act as credible advisors in this domain, not only as checkers (Glendinning, 2020). This advisory function is most effectively performed by evaluators who have direct experience of academic integrity governance in practice, who have engaged with the evidence on effective institutional responses, and who can communicate findings in ways that motivate genuine change.

In this sense, the development of evaluator competency in academic integrity assessment is worthwhile for improving the effectiveness of the QA function itself. For example, TEQSA has developed evaluator guidance materials as part of its broader academic integrity suite; the QAA Quality Compass (2024) provides a self-assessment tool for navigating institutional challenges that can be repurposed for evaluator training as well as institutional self-assessment.

It is also worth noting that some QA agencies, including JUAA, are engaged in the capacity building of HEI quality assurance staff. Such initiatives can contribute to preserving academic integrity in teaching, learning, and research.

Christian Heritage College: Gen AI risk heat map

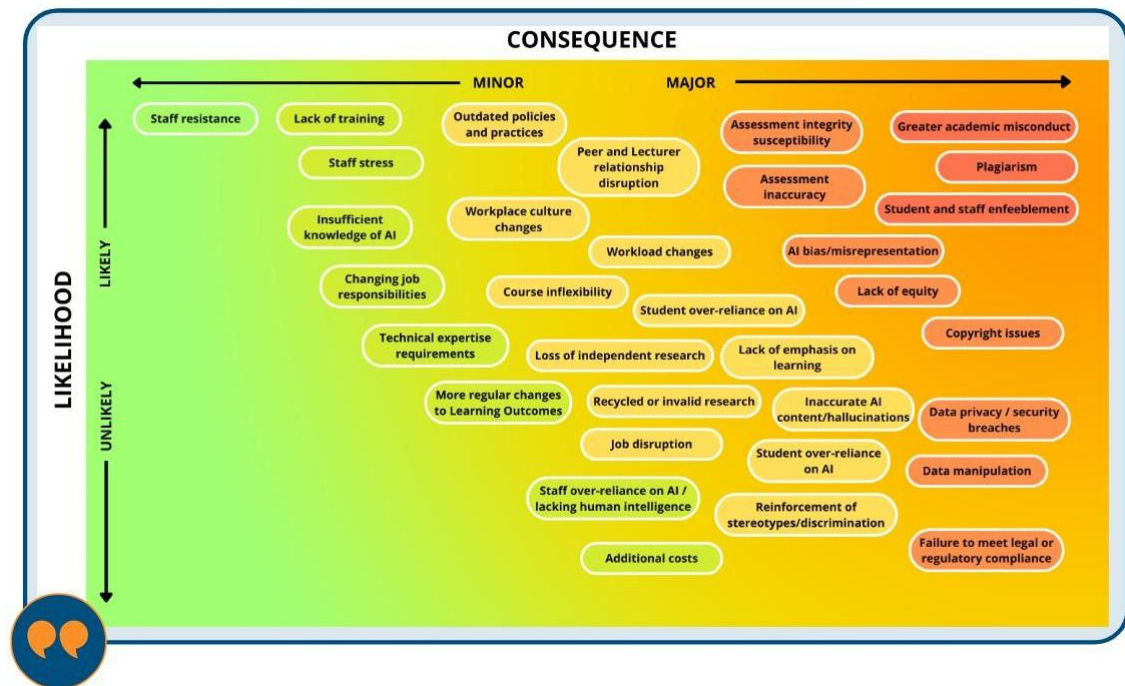


Figure 7: Assessment AI risk heat map (TEQSA, 2024)

6.4 Legislative advocacy

Quality assurance agencies occupy a structural position in the landscape of higher education stakeholders that supports their role in advocating for legislative change. Their authority creates both an opportunity and a responsibility to advocate publicly for the legislative acts that academic integrity requires.

The two most consequential pieces of legislation in this domain (the Australian TEQSA Act 2020 amendment and the Irish Qualifications and Quality Assurance Act 2019 amendment) were both preceded and supported by sustained advocacy from the respective QA agencies (Australian Parliament, 2020; QQI, 2023). In the Australian case, TEQSA developed and published the evidence base that made the legislative case for criminalising contract cheating services, demonstrating both the scale of the industry and the inadequacy of non-legislative responses. This is a model of QA agency engagement with the legislative process that is legitimate, evidence-based, and consequential: using the agency's data and analytical authority to inform public policy.

The absence of detailed contract cheating service legislation and policy in Romania creates a structural gap that significantly limits the enforcement capacity of institutional academic integrity practice, which also gives impetus for further legislative advocacy.

6.5 International cooperation

The challenges for academic integrity are not contained within national borders. Contract cheating services operate internationally, AI tools are developed and distributed globally, and the student populations are internationally mobile. This means that national QA agency responses, however well-designed, are partial without complementary international cooperation mechanisms.

INQAAHE's role as a global QA network creates a specific responsibility in this domain. The toolkit (INQAAHE, 2020) provides a starting point; a further valuable contribution INQAAHE could consider is facilitating structured knowledge transfer between agencies at different stages of policy development. The NZQA model, which adapts open-access materials developed by QQI for the New Zealand context, demonstrates that this transfer is both feasible and cost-effective when originating agencies make their materials openly available and investing agencies have the capacity to undertake contextualisation work. INQAAHE could formalise this process by establishing a library of open-access guidance materials that member agencies have made available for contextualised adaptation; facilitating peer learning visits between agencies at different stages of policy development; and commissioning periodic updates to the sector intelligence picture using the CHEA/CIQG inventory model. The table below summarises these complementary instruments:

Instrument	Description
Sector intelligence and alerts	Rapid communications to institutions on emerging threats; documented pattern analysis;
National network convening	Convening institutional practitioners in a shared learning and guidance development community with a QA agency as coordinator
Guidance publication and open licensing	Development and free distribution of accessible, practically oriented guidance for institutions, evaluators, students and staff
Evaluator capacity building	Training of accreditation panel members on academic integrity culture assessment; developing criteria for distinguishing genuine from performative compliance
Legislative advocacy	Evidence-based policy submissions to government on legislative gaps; formal recommendations for contract cheating legislation; participation in national AI governance frameworks
International cooperation	Structured knowledge transfer between agencies; participation in global networks; facilitation of adapted open guidance materials

Table 12: The QA agency toolkit for Academic Integrity support beyond external QA

Section 7: Policy recommendations

The analytical and comparative work presented in Sections 2 through 6 converges on a clear prescription that the measures required to close the academic integrity governance gap are evidenced and have been implemented successfully by peer agencies. This section is organised in three tiers (immediate, short-term, and medium-term) recommendations for ARACIS, reflecting the realistic timescales for different types of action, and closes with a set of suggestions for INQAAHE.

The recommendations are grounded in the evidence base assembled throughout this paper. Each recommendation is traceable to the comparative findings in Section 3, the AI-specific analysis in Sections 4 and 5, the broader toolkit analysis in Section 6, and the ARACIS-specific contextual analysis in Section 2. The distinction between immediate and short-term actions reflects not a difference in urgency, but a difference in complexity.

7.1 Immediate actions (2026)

The following actions can be initiated within the current accreditation cycle without requiring formal revision of ARACIS accreditation standards, legislative changes, or significant new resource investment.

The first immediate action is communicating with HEIs on AI-enabled academic misconduct. This communication should document the nature of the AI integrity challenge in plain language accessible to institutional leaders; provide a clear account of the risks; specify already existing expectations of HEIs based on the existing ESG requirements and Romanian legislative obligations; and direct institutions to the open-access guidance materials that are already available. At the same time, the communication could refer to how assessment should be revised based on AI development and expose the limits of the use of AI detection tools in academic misconduct checks.

The second immediate action is the initiation of planning for a Academic Integrity Network, including consultation, stakeholder engagement, and resource planning, with a public commitment to the initiative and beginning engagement with the National Rectors' Council (CNR), student federations, and relevant ministerial bodies such as CNEMU, together with other bodies that would form the network's membership base. QQI's experience with the NAIN demonstrates that the planning and consultation phase is critical to producing a network that institutions trust and invest in rather than treating it as another compliance obligation.

The third immediate action is a formal request to Romanian higher education institutions to provide basic information on how they have been responding to the use of AI in higher education: whether an institutional policy exists; what it covers (learning and teaching, research, academic integrity, assessment, governance etc), whether software tools are available, whether staff and students have received relevant training, and whether they have a functioning misconduct investigation process. This data collection can be framed as a voluntary sector intelligence exercise, with the commitment that the data will inform both peer learning and ARACIS' work.

7.2 Short-term actions (2026-2027)

The primary short-term action is issuing guidance interpreting how ARACIS accreditation standards embed academic integrity in the context of AI developments. Indicator I.P.C.1.1.3 related to the Ethics Code could be interpreted to include policies such as defined academic integrity principles applicable to all members of the academic community, including provisions on the use of artificial intelligence; a system for ensuring those principles are communicated to all students and staff; and that they have functioning mechanisms for investigating and responding to violations. This three-part architecture (define, disseminate, respond) is operationally assessable and consistent with ESG requirements.

Alongside, ARACIS could develop evaluator training materials specifically focused on assessing institutional academic integrity culture. Drawing on the Glendinning (2017) Scorecard framework and the INQAAHE Toolkit indicators, the training should equip evaluators to assess the validity and AI-resilience of programme-level assessment design and provide developmental, constructive and insightful feedback to institutions. The training could be piloted with the Specialty Commissions, evaluated for effectiveness, and then rolled out across the full ARACIS pool of evaluators (staff and students).

ARACIS should also strengthen the standard on assessment design within the programme accreditation criteria, referencing AI resilience. Currently, most European QA frameworks, including ARACIS, examine whether assessment methods are appropriate and valid in general terms, but do not specifically assess whether the assessment tasks designed by programmes remain valid in an environment where AI tools can produce passable outputs for many standard task types. ARACIS's existing standards already require that assessment methods be diverse and appropriate to disciplinary learning outcomes; the specific gap is the absence of an explicit requirement that programmes review and adjust assessment design in light of current AI tools. The Specific Standards could be strengthened to close this gap, requiring programmes to demonstrate that they have reviewed their assessment design against the realities of generative AI and made adjustments where necessary. These requests for proving compliance against the standard can be implemented gradually to give existing programmes a realistic transition period.

The formal launch of the Academic Integrity Network could occur in this period, following the planning and consultation process initiated in 2026. The network should be formally established with a charter, membership structure, and a work programme. Initial discussions/presentations could include QQI's National Principles and Lexicon; the adaptation of TEQSA's Assessment Reform for the Age of AI guidance; and the commissioning of a Romanian academic integrity survey to establish baseline data on institutional practice.

7.3 Medium-term actions (2027 and afterwards)

The Comprehensive Academic Integrity (CAI) framework developed by Eaton (2024) identifies eight domains of institutional academic integrity: everyday ethics, institutional ethics, ethical leadership, collegial ethics, instructional ethics, student conduct, research integrity, and publication ethics. This framework represents the most ambitious

operationalisation of what academic integrity governance means at a whole-institution level. Over the medium term, ARACIS's accreditation methodology should progressively expand to address all eight domains rather than focusing primarily on student conduct and research integrity.

Data on academic misconduct trends should be collected and published regularly, a function that falls within CNEMU's existing mandate. The data should distinguish between misconduct types (plagiarism, AI-enabled misconduct, contract cheating, fabrication, falsification), between academic levels, and between disciplinary areas, to produce a picture that is useful for both policy development and institutional benchmarking.

The table below sets out the specific actions and instruments involved:

Action	Instrument
Issue a communication on AI misconduct risks	ARACIS communication to all Romanian HEIs
Initiate planning for an Academic Integrity Network	Internal decision and planning group; initiation of dialogue with stakeholders
Baseline data collection on AI policies' impact on academic integrity in Romanian HEIs	Voluntary survey from ARACIS to Romanian HEIs, followed by presentation of results and peer learning activity
Offer guidance on accreditation standards to embed AI-specific academic integrity criteria	Guidance notes and details on expected evidence
Develop and deliver evaluator training on academic integrity culture assessment	Training curriculum drawing on existing academic literature and examples of other QA agencies
Revise programme accreditation criteria to include AI-resilient assessment design	Revision of Specific Standards; guidance for evaluators on assessing assessment quality
Formally launch of the Academic Integrity Network with a charter, governance arrangements, and inaugural work programme	Network launch event and adoption of the first work programme
Expand accreditation criteria to address all eight CAI domains (Eaton, 2024)	Progressive standard development informed by existing research and experience of evaluators
Establish regular data collection on academic misconduct	Included in ARACIS Barometer

Table 13: Suggestions for ARACIS

7.4 Suggestions for INQAAHE's Consideration

This paper has been commissioned under an INQAAHE project, and its recommendations for ARACIS are intended to model a reform pathway that is applicable, with appropriate contextualisation, to other INQAAHE member agencies. The distributional picture documented in Section 3, in which most QA agencies are operating with pre-AI academic integrity frameworks, is a global phenomenon. INQAAHE's convening role creates the opportunity to address this gap systematically.

Five specific suggestions for INQAAHE's consideration follow from this analysis. First, INQAAHE could consider updating the ISGs to (re)include explicit academic integrity provisions, specifying that member agencies would be expected to have academic integrity requirements in their accreditation frameworks and to be able to demonstrate how those requirements are evaluated in practice. This would create a baseline for the global QA community comparable to what ESG provides in the European context. Second, the INQAAHE Toolkit on Academic Integrity could be actively maintained as a living resource, updated regularly to reflect current developments, and expanded to include the AI-specific dimension as a full component rather than an addendum. Third, INQAAHE might explore establishing a structured mechanism for the sharing of open-access guidance materials between member agencies.

Fourth, INQAAHE could consider commissioning a periodic global survey of QA agencies' academic integrity provision to track progress in closing the policy gap and to identify the agencies whose experience can be most productively shared with peers. The CHEA/CIQG inventory model provides a workable template for this kind of systematic stocktaking. Finally, INQAAHE might consider publicly endorsing the principle that QA agencies would benefit from ensuring that their accreditation frameworks address academic integrity, including the specific challenges of the AI era. Rather than a political position, this approach should be considered a basic professional standard.

No.	Recommended Action	Expected Outcome
1	Consider updating ISGs to include explicit academic integrity provisions with AI applicability	Binding baseline standard for all member agencies; shifts academic integrity to core accountability
2	Consider actively maintaining the INQAAHE Toolkit as a living resource with annual AI-specific updates	Member agencies have access to current evidence and practical guidance
3	Consider establishing an open-access guidance library for contextualised adaptation by member agencies	Low-cost policy transfer of good practice

4	Consider commissioning a biennial global survey of member agencies on academic integrity provision	Identification of practice leaders and peer learning opportunities
5	Consider endorsing the principle that member agencies would benefit from AI-era academic integrity provisions in their accreditation frameworks	Signals global QA community's collective commitment and creates peer accountability among member agencies

Table 14: Recommendations for INQAAHE

Section 8: Conclusions

This paper set out to answer a focused set of questions about how quality assurance agencies monitor and support academic integrity, how generative AI has changed the picture, and what ARACIS and INQAAHE should do in response. The answers are clearer than might have been expected when the project was designed, and considerably more urgent.

The empirical picture that emerges from the systematic analysis of forty-six agencies across forty countries shows the requirement to invest more into how quality assurance treats academic integrity. While most agencies have some academic integrity provision, few embed academic integrity as a fully fledged institutional criterion, and only six have taken the specific step of addressing artificial intelligence in formal standards or binding guidance.

The scale of the AI challenge is not contested. Frontrunner QA agencies have reached a similar diagnosis through independent analysis, that generative AI is categorically different from previous academic integrity threats in its accessibility, its invisibility to existing detection infrastructure, its quality of output, and its interactive character. It requires a response that is equally categorical, with a structural rethinking of what assessment is for, how it should be designed, and what QA frameworks should require of the higher education institutions. The detection-centric response that many institutions have adopted is both technically inadequate and educationally counterproductive. The structurally sound response is assessment redesign that restores the validity of student evaluation by requiring authentic, process-oriented, personalised engagement that AI tools cannot substitute for.

The gap between normative commitment and operational implementation is, on the evidence in this paper, the central problem for academic integrity governance globally. The normative architecture is well developed, and the evidence base is rich with both theoretical grounding and operational models. What is missing is the translation into binding accreditation requirements and active sector guidance.

In Romania, ARACIS sits at the center of the architecture that can close this gap, since quality assurance is the strongest mechanism through which institutional accountability is exercised at systemic level. By examining whether Romanian universities have AI-specific academic integrity policies, whether their assessment designs remain valid indicators of learning, and whether their misconduct processes are fair and transparent, ARACIS creates systemic

incentives for the institutional investments that the evidence shows are necessary. The reform agenda set out in Section 7 is not ambitious in the technical sense, as it does not require new legislation or significant new funding.

Several limitations of the present analysis should be acknowledged. The typological classification of QA provision is based on publicly available documentation and may not fully reflect agency practice in evaluation. The AI impact analysis in Section 4 draws on evidence that is itself rapidly evolving; the relative capabilities of AI tools and detection technologies will continue to change, and some specific claims about detection reliability may become more or less accurate. The comparative coverage of Global South and Middle East agencies is necessarily less detailed than that in the European region, reflecting the availability of English-language documentation.

Three research priorities follow on from these limitations and from the questions this paper was unable to fully address. First, a Romanian-specific academic integrity & AI survey is needed to provide a current evidence base for ARACIS's reform agenda. Second, longitudinal research on the impact of assessment redesign interventions on student engagement and misconduct rates is needed to build the practitioner evidence base that will be required to make the case for resource investment in more authentic assessment. Third, systematic research on the scale and practices of the commercial contract cheating industry in Romania would strengthen the case for legislative action.

The most important contribution of this paper is the argument, sustained throughout, that quality assurance agencies are not bystanders in academic integrity. When they act, they change what institutions invest in, what staff develop capacity in, and what students understand to be expected of them. When they do not act, they signal that the integrity of credentials and the validity of student learning outcomes are not dimensions that warrant their attention. In a period when generative AI has fundamentally changed the conditions under which academic work is produced and evaluated, that signal would be damaging and wrong. The global QA community have both the authority and the obligation to send a different signal, and to build the governance infrastructure that makes it credible.

Appendix:

ARACIS Self-Assessment Indicator Framework for Academic Integrity Governance

This appendix provides a practical self-assessment tool for ARACIS to benchmark its current academic integrity governance against the evidence-based standards identified in this paper. The framework is structured around four domains, each with specific indicators, evidence requirements, and performance levels. It draws on the Glendinning (2017) Scorecard, the INQAAHE Toolkit four-step model, the eleven recommendations of CHEA/CIQG (2016), and the ten emerging standards for QA agencies identified in Table 5.1.

The framework uses a four-level performance scale: Level 0 indicates no action has been taken; Level 1 indicates planning has begun but no operational output has been produced; Level 2 indicates partial implementation with some gaps; and Level 3 indicates full implementation with evidence of effectiveness.

No.	Indicator	Evidence Required for Level 3
Domain 1: ARACIS Policy and Framework	ARACIS's own accreditation standards and institutional governance	
1.1	AI-specific provisions in programme standards	Evidence of institutional compliance assessed in evaluations
1.2	Student academic integrity as an explicit institutional accreditation criterion	Accreditation standard interpretation requiring institutions to demonstrate functioning academic integrity cultures and systems;
1.3	Assessment design quality as an explicit programme accreditation criterion	Programme standards requiring evidence of AI-resilient assessment design; evaluator guidance on assessing assessment quality
Domain 2: Sector Intelligence and Communication	ARACIS's protective and intelligence function toward the Romanian HE sector	
2.1	Communication on AI misconduct	Communication distributed to all Romanian HEIs
2.2	Guidance resources for Romanian HEIs on assessment redesign for the AI era	Translated and contextualised Romanian-language version of AI guidance, including from QA agencies
2.3	Baseline data collection on AI and integrity governance in Romanian HEIs	Survey results published; data disaggregated by institution type and programme area; used to inform accreditation criteria development
Domain 3: Evaluator Capacity and Institutional Development	ARACIS's investment in evaluator competency and institutional capacity building	
3.1	Evaluator training programme on assessing institutional academic integrity culture	Published training curriculum; delivery records for all active evaluators; evaluation of training effectiveness;

3.2	Academic Integrity Network established and operational	Formal charter and governance; active institutional membership; published work programme;
3.3	AI literacy as a required graduate learning outcome	Guidance for integration in the curricula

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Annex 1

Summary of the findings from the six interviews

Between March and April 2026, structured interviews were conducted with representatives from six quality assurance agencies spanning four continents: QQI (Ireland), HAKA (Estonia), TEQSA (Australia), JUAA (Japan), NCQAA (Qatar), and PEQAB (Ontario, Canada), based on the interview methodology presented in Annex 4.

Despite the different regulatory and cultural contexts, the interviews revealed striking convergences in how QA agencies are responding to the academic integrity challenges posed by generative AI, alongside instructive divergences that illuminate different strategic pathways forward. Across all six interviews, a shared narrative emerged regarding the fundamental transformation required in quality assurance. Agencies articulated a movement away from what TEQSA termed "defensive policing" (i.e. retrospective detection of cheating through plagiarism software and post-submission investigations) toward what it called "structural assurance", namely the prospective verification that learning has actually occurred through assessment redesign and systemic data analytics.

This reframing was echoed across agencies. PEQAB stated that their view considers *"It would be a real mistake to try to identify AI as a culprit and try to prevent students from using it."* Instead, the Canadian agency advocated for *"pedagogical practices evolving so that one can tell when students are using it and when they're making some contribution to it."* NCQAA similarly described its mid-term outlook as a "Framework of Flexibility" built on four nodes: diverse institutional innovation, QA agency observation without rigid interference, consensual alignment, and a shift from measuring *"zero cheating"* to evaluating *"better learning outcomes."*

The most philosophically explicit articulation of this shift came from TEQSA, which argued that the regulator's strategic mandate must move beyond attempting to *"regulate your way out of a technological paradigm shift."* Instead, true quality assurance in the GenAI era requires *"abandoning the fantasy of perfect detection"* and pursuing a *"holistic return to structural assurance by pairing rigorous regulatory standards with transparent sector collaboration and the essential financial funding required to entirely redesign how human learning is assessed."*

A notable convergence emerged around the architecture of QA standards. Both TEQSA and NCQAA emphasized dual regulatory anchors with explicit academic integrity standards alongside learning outcomes verification. In the case of NCQAA, academic integrity is referenced into Standard 1 (Integrity & Governance), Standard 4 (Student Success & Research), and notably Standard 5 (Stakeholder Impact). The agency emphasized that *"integrity is not a standalone checklist; it is integrated directly into institutional governance"*.

This integration reflects what colleagues from QQI termed the risk of a *"hollowed-out"* peer review model if academic integrity remains siloed rather than horizontally embedded across all quality dimensions.

HAKA's evolution exemplifies this horizontal integration trajectory. Academic ethics began as one of twelve standalone standards pre-2019 but has since been integrated across Strategic Management, Human Resources, Teaching, and Research standards. The Estonian agency's Standard 8.4, developed in 2024 and piloted in 2026, represents Europe's first mandatory AI standard within an accreditation framework.

Documenting the shift caused by both contract cheating and AI

All agencies reported observing a transformation in the nature and volume of academic misconduct, though with varying levels of quantitative precision. TEQSA documented what it termed an *"integrity squeeze"*, with a 400-500% increase in student misconduct appeals driven by industrialized cheating services. QQI reported the successful removal of contract cheating advertisements from Meta, TikTok, and YouTube through manual reporting, but noted that the traditional contract cheating market has been disrupted by GenAI, since essay mills now use LLMs for first cuts before human refinement.

PEQAB characterized the transition as movement from clear thresholds/easy consensus (plagiarism, contract cheating) to what it termed a confusion zone defined by the absence of clear thresholds for what constitutes cheating and reliable methods for detection.

TEQSA provided the most detailed analysis of how contract cheating syndicates have evolved their business models in response to generative AI. The Australian agency's materials documented that isolated incidents handled by academic staff have been replaced by industrialized disruption with cheating sites providing comprehensive support through the entire misconduct process.

A particularly important conceptual distinction emerged regarding intentionality. TEQSA introduced the framing of *"accidental cheating,"* arguing that while traditional contract cheating involves 8-10% of students acting with clear intentional misconduct, generative AI presents a fundamentally different challenge. The Australian agency described what it termed the *"illusion of competence"*, since students offshore their cognitive load to AI while genuinely remaining unaware that the machine is doing the learning for them. The agency argued that such students graduate without critical skills while maintaining the illusion of proficiency.

Relatedly, a unanimous finding across all interviews was the recognized failure of AI detection software as a reliable quality assurance mechanism. Furthermore, QQI characterized remote proctoring as a *"losing battle"* on equity, privacy, and GDPR grounds.

Moving to assessment redesign

Agencies described observing institutional movement toward two broad assessment redesign strategies, though with different emphases. *Return to Analog* tactics include paper-based exams, closed-book testing, and oral defenses, with the goal being the total elimination of technology to guarantee baseline knowledge retention without AI interference. HAKA corroborated this trend, reporting an observed pedagogical shift toward increased oral examinations and questioning of traditional written assignments. QQI similarly noted a move toward *"in-person writing labs"* and oral components as institutions seek to verify that students can perform without technological assistance. *Critical-Thinking Design* tactics involve highly complex, context-specific assignments, with the goal being to have AI assist with drafting, while critical analysis and synthesis remain uniquely human. NCQAA emphasized the strategic shift from policing *how students use tools* to redesigning *how faculty design assignments*. The agency stated that *"Institutions are shifting away from blind leniency toward accepting a certain baseline of AI usage"*.

PEQAB provided the most explicit pedagogical model for the critical-thinking approach, drawn from the representative's own teaching practice in business ethics. The representative asked students to run prompts through AI in order to get drafts and subsequently refine and reiterate them, showing their original contribution. This scaffolded approach treats AI as a legitimate tool within the learning process while requiring demonstration of student added value.

TEQSA summarized the underlying principle by stating that the focus must shift *"from 'how do we know they cheated?' to 'how do we know they are learning?'"*.

Flexible regulatory frameworks

A strong convergence emerged around the necessity of principles-based rather than prescriptive regulatory approaches. TEQSA stated that *"because technology moves faster than regulation, TEQSA advocates for a principles-based approach that provides enduring guardrails rather than reacting to each tool individually."* NCQAA similarly articulated its mid-term outlook as prioritizing flexibility over rigidity.

HAKA's approach operates through a *"bottom-up institutional autonomy"* model. The HAKA standards expect universities to have internal AI rules, but do not prescribe their content. HAKA described this as a *"continuous search for balanced frameworks"* rather than establishment of rigid red lines. PEQAB also emphasized that while it does not yet have AI-specific benchmarks, the direction will be toward standards that reflect reasonable practice rather than technological prohibition.

JUAA operates through what it termed a *"decentralized institutional autonomy"* model, where the agency evaluates whether universities provide transparent assessment methods and maintain systems for students to appeal assessment results, without prescribing specific academic integrity mechanisms. The Japanese government encourages technological development but has not issued specific mandates requiring universities to adopt AI-specific regulations, leaving institutions with discretion to develop context-appropriate responses.

Internal Agency Use of AI

All agencies reported active exploration or deployment of AI for internal quality assurance operations, though with carefully delineated boundaries. NCQAA is developing a proprietary AI system to track themes across self-study reports to assist case managers, recognizing AI as an efficiency booster when handling voluminous documentation.

Agencies mentioned that AI use is prohibited for writing final review reports, with reasoning centering on critical data sensitivity, confidentiality of institutional self-study reports, and data-privacy risks of public LLMs. This prohibition also ensures human judgment remains central to evaluative processes. HAKA reported that it explicitly instructs its expert reviewers that while they can use AI for preparation and drafting, they are forbidden to upload confidential self-assessment reports to public LLMs due to data privacy risks.

QQI reported similar internal adoption: the Irish agency uses licensed Microsoft Copilot for internal work and MaxQDA Tailwind for thematic analysis, deliberately choosing enterprise-licensed tools that provide data privacy guarantees. They also emphasized that agencies cannot credibly hold institutions accountable for responsible AI use if the agencies themselves lack coherent internal AI policies.

This pattern encouraging internal use, prohibiting external reviewer use with confidential data, and requiring disclosure from institutions represents an emerging international consensus on balancing AI's efficiency benefits against data sensitivity imperatives.

Multiple agencies identified a meta-level risk to quality assurance itself, since the potential for AI-generated institutional reports to be reviewed by AI-assisted panels, creating what QQI termed a "bot-to-bot" process. JUAA characterised this as the "AI echo chamber" risk: AI-generated reports reviewed by AI tools threaten to create a closed loop where human contextual judgment and tacit knowledge, the epistemic core of peer review, atrophy through disuse.

JUAA articulated this risk with particular clarity, describing what it termed the "AI echo chamber" and reports that produce general language without substance. JUAA stressed that AI must remain a "co-pilot" rather than a decision-making authority, with final evaluative power residing exclusively with human reviewers to maintain the integrity of accreditation processes.

TEQSA noted a related phenomenon in the assessment context: heat-mapped data analytics across entire degree programs can flag behavioral anomalies more reliably than brittle AI detectors, but this systemic approach requires massive investment in technical infrastructure and data science capacity. The Australian agency emphasized that without such investment, there is a risk of defaulting to superficial AI-assisted review processes that give the appearance of rigor without substantive analytical depth.

Regulatory Enforcement Successes

QQI managed to remove contract cheating advertisements from major platforms (Meta, TikTok, YouTube) through systematic manual reporting, and TEQSA documented blocking over 550 illegal cheating websites through site-blocking protocols. The Australian agency reported that these interventions produced an initial 50% drop in domestic web traffic to targeted sites. Additionally, TEQSA secured its first civil penalty against Chegg in 2024, following the platform's decision to become a "black box" by refusing to share user data with universities investigating suspected misconduct. This civil penalty serves as what the agency termed "*public signaling*" of enforcement capability, even when direct prosecution proves difficult.

Despite documented successes, agencies identified fundamental structural limits to legal enforcement. Contract cheating services operate outside domestic legal jurisdictions, nullifying local regulatory authority. Furthermore, cheating services deliberately incorporate in jurisdictions with weak IP enforcement and non-cooperative legal frameworks. PEQAB's perspective from the Canadian federal context adds an additional layer: in jurisdictions where higher education is constitutionally a provincial rather than federal responsibility, national-level enforcement mechanisms face additional structural barriers.

Regional and Institutional Specificities

JUAA raised a dimension largely absent from other interviews: the linguistic and conceptual challenges of translating Western academic integrity frameworks into non-Anglophone contexts. The Japanese agency noted that "*academic integrity is not a very common word in Japan,*" and that their quality assurance standards, developed over a decade ago, are "*structurally inadequate for the AI era.*" It is important to note however that the Japanese Ministry of Education, Culture, Sports, Science and Technology (MEXT) was one of the first ministries to publish guidance on plagiarism in 2006.

JUAA's accreditation model integrates integrity concerns across three criteria: fairness in assessing student achievement, management of student information, and honesty and transparency in research. The advantage lies in horizontal integration across multiple quality dimensions, ensuring integrity considerations permeate institutional practices rather than existing as an isolated compliance requirement.

However, different approaches may also reflect deeper questions about whether Western academic integrity concepts map coherently onto educational systems grounded in different philosophical traditions. JUAA emphasized that their approach centers on cultivating "*individual ethical principles*" rather than auditing institutional checklists. The Japanese agency also identified unique risk factors including high-cost barriers for AI tools and language development (Japanese, Romanian) that may differentially affect access and usage patterns across institutions. The broader implication is that quality assurance frameworks developed in Anglophone contexts cannot simply be transplanted. Effective internationalization of academic integrity standards requires engagement with how different educational

philosophies conceptualize student responsibility, faculty authority, institutional obligations, and the relationship between individual development and collective standards.

NCQAA provided detailed analysis of a governance complexity largely unique to Gulf contexts: the hybrid landscape where domestic higher education institutions operate alongside international branch campuses of foreign universities. These branch campuses typically operate under *"imported mother-campus policies"* for academic integrity and AI usage, creating a patchwork QA environment. NCQAA's response has been to embrace this heterogeneity rather than attempt to impose uniformity.

PEQAB's interview illuminated the dynamics of quality assurance in federal systems where higher education is constitutionally a provincial rather than national responsibility. The Canadian representative coordinates a national QA network with informal monthly meetings of all Canadian provincial QA agencies. This voluntary coordination mechanism has addressed AI and academic integrity in the past year. This informal coordination produces a *"norming effect"* through shared understanding of challenges and emerging consensus on responses.

The Canadian model also highlights an important relationship between QA agencies and national frameworks. PEQAB developed the Ontario Qualifications Framework in the early 2000s; Ontario subsequently brought it to the Council of Ministers of Education Canada (CMEC), which adopted the degree portion as the Canadian Degree Qualifications Framework.

Co-Design, Collaboration, and the Practitioner-Led Model

NCQAA reported focusing training and workshops directly on university QA units to build institutional capacity for managing AI-related integrity challenges, and QQI noted that the refresh of Ireland's NAIN (National Academic Integrity Network) in 2025 explicitly expanded its remit to include vocational and further education providers, recognizing that academic integrity challenges are sector-wide rather than confined to traditional universities.

TEQSA noted the QA agency's role becomes creating safe channels for sharing specialized analytical tools and effective practices, with the goal of elevating the entire sector simultaneously.

Multiple agencies emphasized engagement with international networks as an essential components of their co-design and learning strategies. This embeddedness in international networks serves multiple functions: it provides early warning of emerging challenges and promising practices; it creates normative pressure toward convergence on effective responses; and it offers political ambitus for agencies facing domestic resistance to regulatory innovation. When an agency can point to parallel developments across multiple jurisdictions, it strengthens the case that proposed changes reflect international consensus rather than idiosyncratic local preferences.

JUAA emphasized that the next three to five years will necessitate a fundamental shift in quality assurance focus from evaluating institutional procedures to assessing the ethical principles of students and staff. The Japanese agency argued that when technological capabilities evolve faster than governance structures can adapt, quality assurance must pivot from measuring adherence to static rules toward evaluating institutional capacity for ethical reasoning and adaptive judgment. The Japanese perspective suggests that the appropriate QA response to rapid technological disruption is not increasingly prescriptive regulation, which will always lag behind innovation, but cultivation of institutional ethical capacity that enables adaptive responses grounded in enduring principles.

Annex 2

Summary of the survey results

Respondent Profile

Nine quality assurance agencies participated in the survey, representing diverse geographical regions and regulatory contexts. We would like to thank all of them for answering our survey.

#	Agency Name	Acronym	Jurisdiction
1	Association for Evaluation and Accreditation of Nursing Programs	HEPDAK	Türkiye
2	Comisión Nacional de Acreditación	CNA Chile	Chile
3	National Accreditation Bureau for Higher Education	NAB	Czech Republic
4	High Council for the Evaluation of Research and Higher Education	Hcéres	France
5	National Accreditation Council	NACB	Belize
6	National Council for Higher Education	NCHE	Namibia
7	Aragon Agency for QA and Strategic Foresight in HE	ACPUA	Spain (Aragon)
8	National Agency for the Evaluation of Universities and Research	ANVUR	Italy
9	Oman Authority for Quality Assurance of Education	OAQA	Oman

All nine responding agencies operate primarily at national or sub-national level within single jurisdictions.

National Policy Frameworks

Academic Integrity Frameworks

Existence of national frameworks: 4 of 9 jurisdictions (44%) reported having a national or sub-national framework for academic integrity in higher education. Of the four frameworks:

- Two are based on legal provisions alone
- One combines legal provisions with QA agency guidance
- One relies on dispersed institution-level regulations under general HE law (Italy)

AI adaptation: None of the four existing frameworks have been revised or adapted to address recent developments in artificial intelligence.

Artificial Intelligence Frameworks

National AI frameworks for higher education: Only 1 of 9 jurisdictions (11%) – Spain reported having a dedicated national framework for the use of artificial intelligence in higher education.

QA Agency Standards and AI Consideration

Integration of Academic Integrity Standards

Standards inclusion: 6 of 9 agencies (67%) reported that their external quality assurance methodologies or procedures include standards on academic integrity.

Extent of AI Consideration

Agencies were asked to what extent they consider the impact of artificial intelligence on academic integrity. The responses reveal varying levels of integration:

- **1 agency** (11%) reported not considering AI impact at all
- **8 agencies** (89%) consider AI impact to some degree, in the following areas:
 - Integration into learning and teaching standards (4 agencies)
 - Integration into student assessment standards (4 agencies)
 - Integration into institutional management/governance standards (3 agencies)
 - Dedicated standards/policies specifically addressing AI and academic integrity (2 agencies)

These findings indicate that while most agencies are actively considering AI's implications, integration remains nascent. Only two agencies (HEPDAK and OAQA) have mentioned developing dedicated AI-specific standards, while others are embedding AI considerations within existing quality dimensions.

Priority Areas for QA Attention

Agencies were asked to rate the importance of seven QA areas regarding AI and academic integrity. The table below presents the frequency distribution across importance levels:

QA Area	Very Important	Important	Somewhat Important
Student assessment validity and reliability	7	2	0
Faculty training and support	6	3	0
Research	6	1	2
Student learning outcomes	4	4	1
Learning and teaching	4	4	1
Student training and support	4	3	2
Technology access and infrastructure	3	5	1

Key finding: Student assessment validity and reliability emerged as the top priority, rated 'very important' by 7 of 9 agencies. Faculty training and support, and research integrity, were each rated 'very important' by 6 agencies, indicating strong consensus on these priorities.

Observed Institutional Responses to AI

Agencies were asked to assess the extent to which AI has led to specific institutional responses in the higher education institutions under their jurisdiction. The most frequently observed responses include:

- **More awareness of assessment integrity:** 6 agencies reported this occurring 'to a great extent'
- **Citation requirements for AI-generated content:** 5 agencies observed 'great extent' adoption
- **Adapted learning/teaching practices:** 4 agencies reported 'great extent' adaptation
- **Assessment design modifications:** 4 agencies observed 'great extent' implementation

Conversely, responses implemented 'to some extent' (moderate adoption) include guidelines on AI use (7 agencies), disciplinary procedures for AI misuse (6 agencies), and student training on ethical AI use (4 agencies).

Assessment Modifications

When asked which assessment modifications are most commonly implemented, agencies reported the following practices:

Assessment Modification Type	Frequency
Portfolio-based evaluation	8
Project-based assessments	7
Collaborative group work	5
Oral examinations and presentations	4
Time-limited assessments	4
Increased use of in-class examinations	3

Portfolio-based evaluation (8 agencies) and project-based assessments (7 agencies) are the most commonly observed modifications, suggesting a sectoral shift toward assessment methods that emphasize process demonstration and cumulative evidence of learning rather than one-time submissions vulnerable to AI completion.

Greatest Concerns About AI's Impact

Agencies were asked to identify their top three concerns about AI's future impact on academic integrity. The distribution of concerns was:

Concern	Selections
Advancement outpacing detection capabilities	6
Erosion of critical thinking skills	6
Loss of authentic assessment validity	5
Biased content produced by AI	2
Legal and ethical complications	1
Increased inequality in educational outcomes	1
Loss of employer confidence in credentials	1

Three concerns dominate agency perspectives: AI advancement outpacing detection capabilities (6 selections), erosion of critical thinking skills (6 selections), and loss of authentic assessment validity (5 selections). These top concerns align with the priority agencies place on assessment validity and faculty training, suggesting coherent strategic awareness of where AI poses the greatest threats to quality assurance.

Agency Internal Capacity and Preparedness

Internal Policies and Governance

- **Conflict-of-interest policy:** 7 of 9 agencies (78%) have adopted such policies
- **Internal Code of Ethics:** 9 of 9 agencies (100%) have adopted internal codes
- **Internal AI policy:** 0 of 9 agencies (0%) have adopted internal AI policies

Critical finding: While all agencies have internal integrity frameworks, none have yet developed dedicated internal policies governing their own use of artificial intelligence. This represents a significant governance gap, particularly given that agencies are increasingly considering AI's role in external quality assurance processes. One agency (HCERES) is in the process of developing such an internal policy, per survey findings.

Self-Assessment of Capacity

Agencies rated their capacity on two dimensions using 1-5 scales:

Sufficient tools to support academic integrity: Average rating of 2.9/5 (Range: 1-5; Mode: 3)

AI preparedness to address AI-related challenges: Average rating of 2.6/5 (Range: 2-4; Mode: 2)

Annex 3

Survey on Academic Integrity and Artificial Intelligence for INQAAHE Quality Assurance Agencies

This annex presents the complete survey administered to participating quality assurance agencies. The survey was conducted via online questionnaire (Google Forms) between December 2025 and March 2026.

Section I: Respondent Identification

I.1 Quality Assurance Agency (QAA) name:

[Open text field]

I.2 QAA acronym:

[Open text field]

I.3 Name of the respondent:

[Open text field]

I.4 Position in the QAA of the respondent:

[Open text field]

I.5 Is your QAA primarily active in one jurisdiction (national/sub-national level)?

- ☐ Yes
- ☐ No

Section II: National/Sub-National Framework for Academic Integrity

II.1 Please mention the jurisdiction that your QAA primarily operates in here:

[Open text field]

II.2 Is there a national/sub-national framework (regulations or guidance) for academic integrity in higher education in your jurisdiction?

- ☐ Yes
- ☐ No
- ☐ I don't know

II.3 What is the status of the national/sub-national framework for academic integrity?

- ☐ Legal provisions
- ☐ Guidance from the Ministry
- ☐ Guidance from the QAA
- ☐ Other: *[Open text field]*

II.4 Please provide the link to the relevant national/sub-national framework(s) for academic integrity (in English, if available)

[Open text field]

II.5 What types of academic misconduct does the framework consider?

- ☐ Bribery
- ☐ Conflicts of interest
- ☐ Collusion
- ☐ Contract cheating
- ☐ Data fabrication
- ☐ Harassment
- ☐ Impersonation
- ☐ Plagiarism of students
- ☐ Plagiarism of staff/researchers
- ☐ Unethical research
- ☐ Other: [Open text field]

II.6 Was the national/sub-national framework revised or adapted based on the recent developments in artificial intelligence?

- ☐ Yes
- ☐ No
- ☐ I don't know

II.7 If yes (revised or adapted guidance), please mention key changes in the national framework for academic integrity in consideration of the recent developments in artificial intelligence:

[Open text field]

Section III: National/Sub-National Framework for Artificial Intelligence

III.1 Is there a national framework for the use of Artificial Intelligence in higher education?

- ☐ Yes
- ☐ No
- ☐ I don't know

III.2 What is the status of the national/sub-national framework for artificial intelligence?

- ☐ Legal provisions
- ☐ Guidance from the Ministry
- ☐ Guidance from the QAA
- ☐ Other: [Open text field]

III.3 Please link the relevant national/sub-national framework(s) for artificial intelligence (in English, if available):

[Open text field]

III.4 What does the national/sub-national framework for artificial intelligence include?

- ☐ Ethical guidelines for AI use
- ☐ Requirements for AI literacy/training
- ☐ Assessment guidelines

- ☐ Data privacy and security
- ☐ Academic integrity policies
- ☐ Other: [Open text field]

Section IV: QA Agency Standards and Practices

IV.1 Are your external quality assurance methodologies/procedures including standards on academic integrity?

- ☐ Yes
- ☐ No

IV.2 If yes, are your external quality assurance methodologies/procedures covering the following types of misconduct?

For each type of misconduct: ☐ Yes ☐ No ☐ I don't know

- Bribery
- Conflicts of interest
- Collusion
- Contract cheating
- Data fabrication
- Harassment
- Impersonation
- Plagiarism of students
- Plagiarism of staff/researchers
- Unethical research

IV.3 Which of the following policies or practices related to academic integrity are covered by your external quality assurance methodologies/procedures?

For each item: ☐ Yes ☐ No ☐ I don't know

- Existence and content of the institutional Code of Ethics for students and staff
- The promotion and application of the institutional Code of Ethics for students and staff
- Responsible structures for protecting and promoting academic integrity
- Engagement of internal stakeholders in the development and implementation of academic integrity policies
- Training on academic integrity and misconduct for staff
- Training and communication on academic integrity for students
- Academic writing skills for students
- Use of antiplagiarism software
- Use of online proctoring software
- Fair, effective and consistent policies for handling plagiarism
- Proportionate sanctions for plagiarism
- Access to a repository of resources on academic integrity for staff and learners

IV.4 What other activities did your QAA conduct in relation to academic integrity?

- ☐ Guidance documents for HEIs
- ☐ Trainings for HEIs
- ☐ Trainings for reviewers

- ☐ Peer learning and networking activities
- ☐ Engagement in international activities on academic integrity
- ☐ Other: [Open text field]

IV.5 To what extent does your agency consider the impact of artificial intelligence on academic integrity in higher education?

- ☐ We do not consider the impact of artificial intelligence
- ☐ Dedicated standards and policies on academic integrity which consider artificial intelligence
- ☐ Consider the impact of artificial intelligence in the standards for learning and teaching
- ☐ Consider the impact of artificial intelligence in the standards for student assessment
- ☐ Consider the impact of artificial intelligence in the standards for institutional management/governance
- ☐ Other: [Open text field]

IV.6 From your QAA's view, which QA areas require most attention regarding AI and academic integrity?

Rate each area: Very important / Important / Somehow important / Not important / I don't know

- Student Assessment validity and reliability
- Faculty training and support
- Student training and support
- Student learning outcomes
- Technology access and infrastructure
- Learning and teaching
- Research

Section V: Institutional Responses to AI

V.1 To what extent do you consider that artificial intelligence has led to the following in the HEIs under your jurisdiction:

Rate each item: To a great extent / To some extent / To a little extent / Not at all / I don't know

- More awareness on the integrity of assessment
- Adapted learning and teaching practices
- Assessment design modifications
- Guidelines on the use of AI (prohibited/acceptable uses)
- Citation requirements for AI-generated content
- Faculty guidelines for AI detection
- Student training on ethical AI use
- Disciplinary procedures for AI misuse

V.2 If any, which assessment modifications are most commonly implemented based on your QAA's experience?

- ☐ Increased use of in-class examinations

- ☐ Oral examinations and presentations
- ☐ Time-limited assessments
- ☐ Project-based assessments
- ☐ Collaborative group work
- ☐ Portfolio-based evaluation
- ☐ Other: [Open text field]

**V.3 What are your greatest concerns about AI's future impact on academic integrity?
(Please choose up to 3)**

- ☐ Erosion of critical thinking skills
- ☐ Loss of authentic assessment validity
- ☐ Advancement outpacing detection capabilities
- ☐ Increased inequality in educational outcomes
- ☐ Loss of employer confidence in credentials
- ☐ Biased content produced by AI
- ☐ Legal and ethical complications
- ☐ Other: [Open text field]

Section VI: QA Agency Internal Capacity

VI.1 Did your QAA adopt a conflict-of-interest policy?

- ☐ Yes
- ☐ No
- ☐ I don't know

VI.2 If yes, which are the target groups?

- ☐ QAA leadership
- ☐ QAA staff
- ☐ External reviewers
- ☐ All of the above
- ☐ Other: [Open text field]

VI.3 Did your QAA adopt an internal Code of Ethics?

- ☐ Yes
- ☐ No
- ☐ I don't know

**VI.4 To what extent do you think your QAA has sufficient tools to support academic integrity
in higher education?**

[Scale: 1 (Not sufficient at all) to 5 (Fully sufficient)]

**VI.5 What could be improved in order for quality assurance to better support academic
integrity?**

[Open text field]

VI.6 Did your QAA adopt an internal policy on the use of AI?

- ☐ Yes

-
- No
 - I don't know

VI.7 How prepared is your agency to address AI-related challenges?

[Scale: 1 (Not prepared at all) to 5 (Fully prepared)]

VI.8 Please share any additional insights, concerns, or recommendations regarding AI's impact on academic integrity and the role of QA:

[Open text field]

Annex 4

INTERVIEW METHODOLOGY

1.1 Background and research context

This interview package is part of a broader policy research project commissioned by the Romanian Agency for Quality Assurance in Higher Education (ARACIS) and funded by the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) through a project funding call.

The project aims to produce a comprehensive, evidence-based policy paper assessing how quality assurance (QA) agencies monitor and support academic integrity (AI) in the context of rapidly evolving artificial intelligence (AI) technologies.

The desk-based phase of the research analysed the published policies of 47 QA agencies across Europe, Asia-Pacific, the Americas and the Middle East. This analysis revealed that, while approximately two-thirds of agencies have some academic integrity provisions within their accreditation frameworks, it is unclear the extent to which they consider specifically the disruptions provided by artificial intelligence, with only a few agencies having formalized guidance specifically addressing AI-enabled academic misconduct. The picture is therefore one of uneven policy maturity and significant gaps in the sector's collective response to AI-enabled threats to academic integrity. However, certain quality assurance agencies have produced extensive work on the subject, with

The in-depth interviews seek to move beyond what policies articulate to understand how agencies actually operationalise academic integrity monitoring, what challenges they encounter in practice, and how they are adapting their work in response to generative AI. The insights gathered will directly inform the policy paper's findings, recommendations and proposed good-practice framework.

Research context note

The policy paper is being produced for ARACIS and will be disseminated through INQAAHE to the global QA community. Interview findings will be cited with the agency's explicit consent. Participants may choose to be quoted by name or to have their responses attributed anonymously. All transcripts are used solely for research purposes.

1.2 Objectives of the interviews

The interview phase pursues four interconnected objectives:

- To understand how selected QA agencies currently integrate academic integrity monitoring into their external quality assurance activities.
- To explore how agencies perceive the impact of generative AI on academic integrity, and how their policies, guidance and monitoring practices have adapted (or are adapting) in response.

- To identify good practices, innovative approaches and transferable models in the monitoring and support of academic integrity that may not be fully visible in published policy documents.
- To gather agency perspectives on the appropriate role of QA bodies in supporting the sector's response to AI-enabled academic misconduct, including areas where national legislation, inter-agency collaboration or international standards may be needed.

1.3 Selection of agencies and rationale

Nine QA agencies were selected for interview from among the 46 agencies reviewed in the desk-based phase. Selection followed a purposive sampling strategy designed to achieve diversity across four dimensions: geographic region, institutional mandate, policy maturity in academic integrity and specific policy strengths relevant to the research questions.

The resulting sample spans four continents and encompasses agencies with contrasting mandates, different relationships to national legislation on academic misconduct, and varying degrees of engagement with AI-related guidance. The table below summarises the selection rationale.

Agency	Country	AI Coverage	Selection Rationale
QAA	UK	Yes (Quality Compass, 2023)	Pioneer in AI/AInt guidance; national-legislative engagement; essay mills legislation
QQI	Ireland	Via NAIN (indirect)	Pioneer in AI/AInt guidance; NAIN coordination; national AInt framework and lexicon adopted internationally
TEQSA	Australia	Yes (sector alerts)	Strong legislative framework; contract cheating prohibition; AI spinners alert
JUAA	Japan	Not documented	Provides Asia-Pacific non-Western perspective; research ethics focus; under-researched context
PEQAB	Canada	Not documented	Programme-level accreditation in Canadian context; North American lens
HAKA	Estonia	Yes (explicit standard)	European agency with AI explicitly in accreditation standard; small-state model
CNA	Chile	Not documented	Latin American perspective; anti-plagiarism specific policies; under-researched region
NCQAA	Qatar	Not documented	Middle East/Gulf perspective; institutional accreditation with integrity standard;
AQU Catalunya	Spain	Not documented	Subnational agency; multiple accreditation types; academic/research integrity convergence

1.4 Interview design

The interview instrument adopts a semi-structured format. A core set of six questions applies to all agencies, addressing the research themes common to the project as a whole. Each interview also includes two to three agency-specific questions, developed on the basis of the desk research, to probe particular features of that agency's policies or operational context.

The interview guide is organised into four thematic modules aligned with the four research questions of the policy paper:

- Module A: General approach to academic integrity in QA (how AInt is embedded in accreditation/evaluation frameworks).

- Module B: Perceived impact of AI on academic integrity and the QA agency's response.
- Module C: Operational practices, tools and collaboration (what agencies do in practice).
- Module D: Forward-looking perspectives and recommendations (what agencies see as priorities and gaps).

This modular structure allows the interviewer to manage time flexibly while ensuring that all four research themes receive coverage within the 30-minute window.

1.5 Conduct of interviews

Each interview will be conducted as an individual, one-to-one online meeting lasting 30 minutes. The following procedural arrangements will apply:

- Scheduling: Interviews will be arranged via email, with a Zoom link provided by ARACIS. Participants are invited to confirm their preferred time within a two-week scheduling window.
- Language: Interviews will be conducted in English.
- Recording: With the participant's explicit consent, the interview will be audio-recorded solely for the purpose of producing an accurate transcript. No recording will be shared with third parties. If consent is not given, notes will be taken during the interview.
- Attribution: Responses may be quoted by name and agency, attributed to the agency only (without a named individual), or treated as fully anonymous background information. This choice may be revised at any point before the final paper is submitted.

1.6 Analysis and use of data

Interview transcripts will be analysed thematically using a framework derived from the four research questions and refined by the categories identified in the desk research phase. Analysis will seek to identify: convergences and divergences across agencies; good-practice models that go beyond published policies; gaps between stated policies and reported operational realities; and agency-specific insights that can inform targeted recommendations.

Findings from the interview phase will be integrated with the desk research evidence throughout the policy paper. The policy paper will also include a dedicated section on interview findings. Where interview data contradicts or significantly extends the desk research, this will be noted explicitly. Where multiple interviewees independently corroborate a finding, this will be flagged as convergent evidence.

2.1 Interview questions

The questions below are organised into two sections: the General question set (applicable to all nine agencies) and the Agency-specific questions (tailored to each individual agency on the basis of the desk research). In practice, the general and agency-specific questions will be integrated within the four thematic modules described above.

Section A: General Questions (all agencies)

Module A: Academic Integrity in Your QA Framework

Q1. How does your agency currently address academic integrity within its external QA frameworks? Is academic integrity treated as a standalone criterion or integrated into broader quality standards?

Potential follow-up: Can you give an example of what evidence institutions are typically expected to provide

on academic integrity?

Q2. In your view, what are the most significant forms of academic misconduct that institutions are currently facing? Has the relative importance of different types of misconduct shifted in recent years?

Potential follow-up: For example, have you seen growth in contract cheating, AI-generated submissions or other emerging forms?

Q3. To what extent does your agency require institutions to demonstrate that their assessment practices are designed to uphold academic integrity — for instance, through authentic assessment, oral defenses or other methods resistant to misconduct?

Module B: AI and Academic Integrity

Q4. In your agency's current work, does AI feature explicitly, either as a risk to be managed or as a tool that institutions can use? If not, are there plans to address it?

Module C: Operational Practices and Collaboration

Q5. Beyond formal accreditation criteria, what other ways does your agency support institutions in building a culture of academic integrity? What data or evidence does your agency collect on the prevalence and handling of academic integrity breaches?

Module D: Forward-Looking Perspectives

Q6. Looking at the next three to five years, what do you consider the most pressing changes that QA agencies will need to make to their approach to academic integrity, in light of AI and other developments, and how should agencies respond?

Section B: Agency-Specific Questions

The questions below were developed on the basis of the desk research analysis of each agency's published policies and documentation. They are designed to probe dimensions of each agency's approach that are not fully captured in publicly available documents, or to explore apparent gaps and innovations that warrant further investigation.

QAA | United Kingdom

QA1. Your 2023 'ChatGPT Era' guidance recommends that institutions 'become more agile' in updating their academic integrity policies as AI tools evolve. In practice, what does QAA see as its own role in keeping pace with that agility — do you carry out regular formal reviews of your guidance, or is the response more responsive and event-driven?

QA2. QAA's Quality Compass raises the concept of a 'post-plagiarism era' in which traditional definitions of academic misconduct may no longer be adequate. How is QAA engaging with institutions and other stakeholders to develop shared new understandings of integrity in this context?

QA3. QAA has been central to developing the UK's Academic Integrity Charter. Can you describe how QAA uses its monitoring and review activities to assess whether institutions are effectively implementing the Charter's principles, as opposed to merely signing up to them?

QQI | Ireland

QB1. NAIN is a network-based model rather than a regulatory model. In your view, what are the relative strengths and limitations of a voluntary, network-based approach to building national academic integrity capacity, compared with embedding requirements directly in accreditation standards?

QA2. QQI's advice on academic integrity raises the concept of a 'post-plagiarism era' in which traditional definitions of academic misconduct may no longer be adequate. How is QAA engaging with institutions and other stakeholders to develop shared new understandings of integrity in this context?

TEQSA | Australia

QC1. TEQSA's sector alert approach — issuing targeted, timely communications when a new cheating method emerges — is relatively unusual among QA agencies. How does TEQSA decide when a sector alert is warranted, and how do you assess whether institutions are acting on them?

QC2. Australia's legislative prohibition on contract cheating services is the most comprehensive of its kind globally. In TEQSA's experience, has that legislative framework meaningfully reduced contract cheating, or have cheating services simply adapted their business models in response?

JUAA | Japan

QD1. JUAA's evaluation standards address research ethics for faculty and doctoral students. To what extent does JUAA also evaluate how institutions handle academic integrity for undergraduate and taught postgraduate students — where AI-enabled misconduct is most prevalent?

QD2. Japan's higher education system has a distinct cultural context for academic integrity. In your experience, are the challenges of academic misconduct in Japan similar to those documented internationally, or are there features specific to the Japanese system that require a different approach?

QD3. The desk research did not identify any JUAA guidance or standards specifically addressing generative AI. Is this a topic that JUAA is currently discussing internally, and if so, what is informing that conversation?

PEQAB | Canada

QE1. PEQAB operates at the programme level in a federal country where education is a provincial matter. How does this jurisdictional fragmentation affect your agency's ability to develop and enforce consistent academic integrity standards across the institutions you accredit?

QE2. Canada has a notably active research community on academic integrity and contract cheating. To what extent does PEQAB engage with this research community in developing its standards and guidance, and has this engagement informed your approach to AI?

HAKA | Estonia

QF1. HAKA's institutional accreditation standard 8.4 explicitly requires evidence of AI-related ethics guidelines. Can you describe how this standard was developed — what drove the decision to formalise AI in a binding accreditation criterion rather than through guidance, and was there resistance from institutions?

QF2. In practice, what kinds of AI ethics guidelines are institutions producing, and how does HAKA evaluate whether those guidelines are substantive and effective rather than merely formal?

QF3. Estonia is known for its digital innovation agenda. To what extent does HAKA's approach to AI in academic integrity reflect a broader national digital-ethics policy framework, and is HAKA collaborating with other government bodies on this topic?

CNA | Chile

QG1. CNA has policies specifically addressing plagiarism and contract cheating. Can you describe how these translate into accreditation practice — what evidence must institutions provide, and what

happens when an institution is found to have inadequate anti-plagiarism systems?

QG2. Contract cheating services operating in Spanish are a documented concern across Latin America. Does CNA engage with peer agencies in the region — for instance, through RIACES or other networks — to coordinate approaches to this problem, particularly given that essay mills often operate across national borders?

NCQAA | Qatar

QH1. Qatar's higher education sector includes a high concentration of international branch campuses from universities in the UK, US and elsewhere. How does NCQAA approach academic integrity when the parent institution and the branch campus may have different policies and monitoring systems — who bears responsibility?

QH2. The Gulf region has a rapidly growing EdTech and AI sector. Has NCQAA begun to engage with AI-related academic integrity questions, and are there features of the regional context — cultural, linguistic or regulatory — that require a distinct approach to AI governance in higher education?

AQU Catalunya | Spain (Catalonia)

QI1. AQU's accreditation guides address academic integrity at bachelor's, master's and doctoral levels with distinct provisions at each stage. In your experience, which level presents the greatest academic integrity challenges, and does AI change that picture?

QI2. As a subnational agency operating within the Spanish higher education system, how does AQU coordinate with national and regional peers on academic integrity standards, and is there a risk of fragmentation or inconsistency?