

White Paper on Academic Integrity

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Dearbhú Cáilíochta
agus Cáilíochtaí Éireann
Quality and
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Introduction

Quality and Qualifications Ireland (QQI) was established in November 2012 by the Qualifications and Quality Assurance (Education and Training) Act 2012. A suite of amendments made to the 2012 Act in 2019 included a provision – section 43A – that created new offences related to the facilitation of cheating, the advertisement of cheating services, and the publication of such advertisements. The provision names QQI as a prosecutor of such offences. In enacting this new provision, the legislator recognised the growing threat of ‘essay mills’ to Irish qualifications, education providers, learners and professionals as well as the significant reputational damage that could be caused to the Irish education system if action were not taken to halt or mitigate the activity of such bad actors. The decision to insert section 43A within the 2012 Act was informed by the Australian MyMaster case as well as the Assignment4U case in New Zealand, research emanating from the United Kingdom and the New Zealand Education Act, which made it an offence to advertise cheating services.

More recently, there has been particular focus on the protection and promotion of academic and research integrity following the launch of artificial intelligence tools such as OpenAI’s ChatGPT, Google’s Bard and others. Whilst the use of artificial intelligence for the purpose of learner cheating and academic fraud has exacerbated the existing risks to academic and research integrity, the responses needed from stakeholders within and across the education system to mitigate these risks have not changed significantly. These responses include inter alia continued emphasis on, and enhancement of, academic integrity cultures within education providers, as well as cognisance of vulnerabilities in assessment approaches and methodologies and the rethinking of same to strengthen the security and, most importantly, the validity of assessment.

Section 43A represents a significant opportunity for QQI and other stakeholders within the Irish education system to highlight the importance of academic integrity and the threat posed by contract cheating and other forms of academic misconduct and fraud. However, the provision must be understood within the context of the existing statutory infrastructure and within the overall national academic and research integrity landscape, which includes both regulatory and enhancement-based strands. Also of relevance in this context is the work that is being undertaken both within institutions and at a system level to reform assessment – e.g. QQI’s Rethinking Assessment programme, which aims to encourage reflection, provoke debate, generate new perspectives and support innovation when it comes to assessment .

The policy approach will draw on QQI’s functions as an awarding body, quality assurance agency and national qualifications authority, and will see QQI working in collaboration with the other awarding bodies in the State to ensure that QQI’s fulfilment of its legal responsibilities under the Act is supplemented and supported by a robust and coordinated national approach to this issue. The other awarding bodies in the State include the designated awarding bodies (DABs) and will,

in future, encompass delegated authority awarding bodies (DA ABs) and listed awarding bodies (LABs).

This paper sets out how QQI – in collaboration with the DABs and, in time, the DA ABs and LABs – will underpin the integrity of teaching, learning, and research across the tertiary education system by implementing a policy based on new responsibilities arising from section 43A of the 2012 Act (as amended), as well as from functions and responsibilities emanating from other provisions of the Act – for example, the responsibility, outlined in section 9 of the 2012 Act (as amended), of QQI to safeguard the standards of all awards made in the National Framework of Qualifications (NFQ), and the responsibility of each DAB and LAB under section 43(6) to ensure that learners acquire the standard of knowledge, skill or competence associated with an award within the NFQ before an award is made.

The paper details how the responsibility of education providers for their own internal quality assurance systems, and of learners and staff to engage with their studies, research, and work within the scope of these systems, will interact with the national policy infrastructure. It also describes the obligations of other stakeholders such as advertising and publishing platforms under the legislation and details how QQI will engage with these stakeholders to protect the integrity of Irish qualifications.

Within a European context, implementation of this policy will support and be supported by the Council of Europe's Recommendation on Countering Education Fraud , which encourages member states inter alia to promote quality education by eliminating actions and activities that contribute to education fraud; to take necessary measures to protect learners, researchers and staff at all levels of education from organisations and individuals engaged in offering, marketing and promoting education services that constitute fraud; and to provide support for the implementation of preventative and protective measures by educational providers and relevant stakeholders in education and employment.

The paper specifies the pillars that will encompass all activity to protect academic integrity, learners, researchers, providers, staff, and the national qualifications system, highlighting the important role played by the enhancement work that is led by both QQI and providers; it stipulates the principles that will underpin implementation of section 43A and sets out the partners with whom QQI intends to collaborate in the implementation of this policy.

Finally, the paper provides details of those strands of QQI's work and of activity at national and international levels that will support and be supported by this policy.

The national policy approach

There are five central pillars to this policy:

1. **QQI, as qualifications authority and awarding body, and the other awarding bodies operating in the State** are jointly responsible for safeguarding the standards of all awards in the National Framework of Qualifications (NFQ). These responsibilities emanate from *inter alia* the statutory functions outlined in section 9 of the 2012 Act (as amended), and the responsibility of each DAB and LAB under s. 43(6) to ensure that learners acquire the standard of knowledge, skill or competence associated with an award within the NFQ before that award is made.
2. **Providers of programmes leading to awards within the NFQ** are responsible for developing, implementing, and monitoring the effectiveness of policies, procedures and processes that support and promote academic integrity; providers are also responsible for the secure and valid assessment of learners to support academic integrity and enable trust in the achievement by learners of the knowledge, skill and competence associated with the relevant award.
3. **QQI as QA agency, awarding bodies, providers, their staff and learners and other stakeholders in the system** work in partnership to implement this policy. This entails delineating responsibilities (between QQI and providers) for managing the regulatory environment, pursuing those facilitating or promoting cheating, dealing with instances of contract cheating, and establishing processes to ensure that relevant information is shared by providers with QQI to allow QQI to fulfil its responsibilities under section 43A.
4. **Academic integrity considerations will be incorporated within QQI's existing suite of quality assurance guidelines, policies and procedures** to inform the internal quality assurance processes of all providers across the tertiary education system.
5. **Academic integrity enhancement activity** led collaboratively by QQI and by providers supports QQI's regulatory approach and protection of the national qualifications system. It facilitates the sharing and exchange of information, nationally and internationally, and development and dissemination of good practice across the education sector, supporting the maintenance of cultures of academic integrity within and across providers.

The approach will aim to ensure a coherent and effective response by all actors in the system to the threat posed to Irish qualifications by contract cheating and other forms of academic misconduct. It will be grounded in the existing national qualifications and quality assurance infrastructure and will build on the work of QQI and all actors within the tertiary education sector to enhance awareness of the legislative provision and the obligations that it places on QQI, awarding bodies, providers, their staff and learners, and other important stakeholders such as advertising, publishing and social media platforms.

Legislative underpinning

As set out in the introduction, this policy is grounded within the requirements of the relevant statutory infrastructure, including sections 9, 27(1), 43(4), (6) and (8), and 43A of the 2012 Act (as amended).

Section 9

Section 9 sets out the functions of Quality and Qualifications Ireland. Among these, section 9 lists:

- Promoting, maintaining, further developing and implementing the NFQ (section 9(1)(a));
- Approving providers' quality assurance procedures and monitoring and reviewing such procedures (section 9(1)(c));
- Validating programmes of education and training, and reviewing and monitoring validated programmes (section 9(1)(d));
- Establishing standards of knowledge, skill or competence to be acquired by learners before an award can be made by QQI, or by a provider to whom authority to make an award has been delegated (section 9(1)(e));
- Making awards and delegating authority to make awards, as well as reviewing and monitoring the operation of delegated authority (section 9(1)(f));
- Collecting any information relating to the performance of its functions as it considers appropriate (section 9(1)(p)).

Section 27

Section 27(1)(a) provides that QQI shall issue guidelines for the establishment of procedures for quality assurance.

Section 27(2) stipulates that QQI will consult with relevant providers and linked providers before issuing quality assurance guidelines.

Section 43

Section 43(4) stipulates that each designated awarding body must ensure, in so far as is reasonably practicable, that each award that it makes is included within the NFQ.

Section 43(6) requires each designated and listed awarding body to ensure that each learner achieving an award that it makes in the NFQ must achieve the standard of knowledge, skill and competence associated with the level of that award.

Section 43(8) requires that each provider of a programme of education and training leading to an award in the NFQ must ensure that each enrolled learner achieves the standard of knowledge, skill or competence associated with the level of the relevant award within the NFQ.

Section 43A

Section 43A of the Qualifications and Quality Assurance (Education and Training) Act, 2012 (as amended) creates offences relating to the:

1. Facilitation by a person of learner cheating (this includes providing assignments or examination answers to learners, or sitting an exam (or part of an exam) on behalf of a learner.

2. Advertisement of cheating services.
3. Publication of advertisements for cheating services.

The scope of section 43A is broad and incorporates not only cheating services provided on an organised and for-profit basis, but also comprehends cheating facilitated by other learners¹, friends or family members. The procurement of cheating services by a learner is not in itself an offence.

Under section 5 of the 2012 Act (as amended), QQI is responsible for prosecuting summary offences arising under the Act, whilst responsibility for prosecuting indictable offences under the Act lies with the Director of Public Prosecutions. Section 5 also stipulates that conviction of an offence under the provision is punishable by a fine (up to €100,000) or a term imprisonment (up to five years). Section 5(4) addresses the commission of offences under the Act by bodies corporate and provides that, if the body corporate committed the offence with the “consent, connivance or neglect” of the officer in question, the officer can be prosecuted for that offence.

Implementation of section 43A within the context of the legislative framework and a national approach

The absence of a policy on the implementation of section 43A and of a national approach to protecting and maintaining academic integrity could be used as a defence by those infringing the provision. This policy therefore sets out the manner in which QQI intends invoking section 43A, and how this activity will be supported by other legislative provisions. It also specifies the principles that will underpin this activity.

In implementing its responsibilities under section 43A, QQI will have regard to the following principles, which will ensure the existence of a prima facie case prior to the initiation of any legal action as well as the effective and efficient use of public resources and time – i.e. ensuring that there is an appropriate balance between State investment (time, money and staff resources) in such cases and the benefit to the general good arising from these cases.

Proportionality

Through the exchange of information with education providers and other stakeholders such as advertising, publishing and social media platforms, QQI will deter, detect and address offending activity in a way that is proportionate to the scale and gravity of the offence[s] committed. Where a viable and adequate alternative mechanism exists to deter or otherwise address offending behaviour, that mechanism will be adopted in the first instance before legal action is pursued.

¹ It is important to note that the act of procuring cheating services by a learner does not constitute an offence under section 43A.

Transparency

QQI will ensure that information about laws prohibiting the provision, advertisement or publication of advertisements for cheating services is widely available and accessible to all relevant stakeholders – primarily, but not exclusively, to providers, their learners and staff, advertisers and publishers.

Shared responsibility

QQI will work collaboratively with all relevant stakeholders to ensure an effective and coordinated national approach to the implementation of the law. QQI will encourage and support collaboration and information-sharing between and across providers, and between providers and other relevant stakeholders in the qualifications system, such as professional, statutory and regulatory bodies.

Provider autonomy

QQI recognises that education and training providers are best placed to, and must as a core function, identify and deal with academic misconduct when it occurs within their organisations. It is important to note that the extent of an organisation's autonomy varies depending on its type and that this principle must be interpreted in accordance with each organisation's context (i.e. an awarding body or a provider offering programmes leading to QQI awards or the awards of other bodies whose qualifications are listed within the NFQ). There will be additional requirements set out by QQI for providers of programmes leading to QQI awards (vs. DABs, LABs and DA ABs) (see below).

In accordance with the principle of proportionality, QQI's policy position is that it will not ordinarily pursue legal action against learners, learners' friends/family members, or other individuals where these have offended in a limited way. However, where a provider identifies that an enrolled learner has facilitated cheating by another learner, such behaviour may be subject to disciplinary action under that provider's policies and procedures. Where it is found that an individual who is on a professional register has facilitated cheating by an enrolled learner, action may be taken by the relevant professional, statutory or regulatory body under that body's own regulations.

Other legal considerations

Trademark and national branding

Where QQI or national trademarks and branding (such as the NFQ or the International Education Mark [IEM]) are infringed by entities offering contract cheating services, QQI will invoke its rights under trademark law.

QQI encourages providers to develop processes for managing the infringement of their own registered trademarks in consultation with their own legal advisors.

Freedom of Information Act 2014

From time to time, QQI receives requests under the Freedom of Information Act 2014 in respect of its academic integrity activity. Unless such requests represent impairments to QQI's ability to prosecute alleged offenders under section 43A of the 2012 Act (as amended), QQI will comply with such requests. QQI will engage with journalists and media representatives where such engagement represents an opportunity to publicise the work of QQI and the tertiary education sector and other stakeholders to promote and maintain academic integrity and to highlight the threat posed by bad actors to the Irish qualifications system.

General Data Protection Regulation

QQI will ensure that data collection and processing is conducted within the parameters of the General Data Protection Regulation (GDPR) and will not require that any personal or identifying information relating to individual learners is shared by providers, unless necessary to support the pursuit of legal action.

Other legislation, legal instruments, national/international directives

QQI will invoke other relevant legislation, including national and international legal instruments, regulations and directives, as applicable, to take action against entities providing, advertising or otherwise promoting contract cheating services. In particular, QQI will ensure that this policy and its implementation align with and support the 2022 [Council of Europe Recommendation on Countering Education Fraud](#). The European [Digital Services Act](#) will also support the implementation of this policy.

Incorporating academic integrity considerations within QQI policies and processes

QQI will incorporate academic integrity considerations organically within all national policies, procedures, processes, and instruments (see Pillar 4) and will require that appropriate consideration is given to academic integrity within providers' policies, procedures, processes and instruments. These include:

- The generality of policies supporting the NFQ.
- QQI's Core Statutory QA Guidelines and other selected topic- and sector-specific statutory QA guidelines, as applicable.
- QQI's policy and criteria for making awards.
- QQI policies and processes relating to:
 - o Programme validation and review.
 - o Delegation of authority.
 - o Provider monitoring and review.
 - o The International Education Mark.
 - o [Listed Awarding Bodies and Associated Providers](#).

The adaptation of the above policies and procedures will be informed by nationally developed guidelines on academic and research integrity. These include, for example, the National Academic Integrity Network (NAIN) Academic Integrity [Principles](#) and [Guidelines, as well as the National Research Integrity Forum's National Policy on Ensuring Research Integrity in Ireland](#).

Following consultation with the further education and training and higher education sectors, QQI will consider adopting the NAIN Lexicon of Common Terms so that the terminology used across QQI's policies and procedures will reflect the same terms as defined within the Lexicon to enable a common language and understanding across the tertiary education sector. QQI is aware of the need for the Lexicon to remain a living document that reflects developments with regard to academic integrity and will ensure that any references to terminology within QQI policy and procedure are cognisant of updates and amendments to the Lexicon.

Provider policies, procedures and processes

All providers

QQI expects that all providers mainstream academic integrity through their existing suite of policies. Policies should be reviewed and revised as necessary periodically to ensure that they are current and capture newly evolved risks to academic integrity. QQI expects that the facilitation of cheating by learners will be referenced within academic integrity policies as a form of academic misconduct that is subject to penalties. Updates to policies and procedures relating to academic integrity will be notified to QQI as part of systematic quality monitoring and reporting.

QQI expects that providers will ensure that relevant policies and procedures are accessible and clearly communicated to all learners and staff. Furthermore, QQI expects that all members of provider's communities (learners, researchers and staff) are supported to understand their obligations under provider policies and procedures, the potential repercussions of their infringement, and the supports available to those who are subject to disciplinary processes arising from such infringement.

Providers will be obliged (in different ways, depending on their activity) to implement a system of robust internal detection, monitoring, recording and reporting processes to ensure that there is a centralised overview of academic misconduct across the provider. QQI advises that this system should be cognisant of best practice – for example, the NAIN Framework for Academic Misconduct Investigation including Case Management. Such a system should inform the identification of potential areas of weakness or risk within the provider's teaching, learning, assessment or student supports, and may lead to the adjustment of approaches or methodologies in these areas, or the deployment of additional supports and resources. QQI also expects that a summary of some of the detail collected through internal monitoring would be shared with QQI to inform a national-level picture of academic misconduct and contract cheating (further details are provided under 'Monitoring and reporting' below).

As noted above, academic integrity considerations will be incorporated within QQI's provider monitoring and review practices, as well as within QQI's QA guidelines, policies, procedures and processes. Following consultation with the sector and the review of all relevant documents, QQI will consider incorporating elements of nationally produced guidance on academic and research integrity within its Core Statutory QA Guidelines and other topic-specific statutory QA guidelines, as well as within other QQI policies, processes and procedures.

Designated awarding bodies (DABs), listed awarding bodies (LABs) and delegated authority awarding bodies (DA ABs)

As set out above, academic integrity considerations will be incorporated within QQI's provider monitoring and review practices. In framing their policies and procedures to ensure the maintenance of good academic practice and of academic integrity, and the integrity of all awards

made, the DABs, LABs and DA ABs should have regard to all relevant statutory quality assurance guidelines and are referred to relevant nationally produced resources, including:

- [Academic Integrity National Principles and Lexicon of Common Terms](#)
- [Academic Integrity Guidelines](#)
- [Framework for Academic Misconduct Investigation including Case Management](#)
- [Policy Statement on Ensuring Research Integrity in Ireland](#)

Each awarding body is advised to consider the repercussions for any graduates found to have engaged in serious academic misconduct during their studies. This includes processes to investigate any suspicions or allegations that graduates have engaged in serious academic misconduct and, if such activity is confirmed to have occurred, actions to uphold the integrity of qualifications. This may extend to the withdrawal of awards. Where an individual is found to have facilitated cheating by an enrolled learner and that individual is on a professional register or eligible for professional registration, awarding bodies should also consider establishing processes to notify the relevant professional statutory or regulatory body.

Providers of programmes leading to QQI awards

In accordance with its responsibility to ensure the integrity of the awards it makes in the NFQ, QQI sets out additional expectations of the providers of programmes leading to QQI awards in the sections below.

Awards made by QQI can be withdrawn under QQI's [Policy and Criteria for Making Awards](#) if it is found that the learner did not deserve that award²; this conclusion may be reached following a finding that the individual engaged in serious academic misconduct during the course of their studies.

As set out above, QQI will adapt the Core Statutory QA Guidelines to incorporate academic integrity considerations. As in the case of all providers, providers of programmes leading to QQI awards will be expected to have regard to these statutory QA guidelines in the development of their policies and procedures (although there is no intention to prescribe how providers implement the guidelines or frame their respective policies and procedures).

QQI conducts awareness-raising activities for providers of its awards and communicates information regarding any risks to academic integrity through periodic academic integrity updates, briefing events and the like; however, in accordance with the principle of provider-owned internal quality assurance systems, QQI expects that providers of programmes leading to QQI awards have robust academic integrity policies and procedures in place that are applied

² "If, after the award has been made to a learner, it can be demonstrated that the learner did not deserve the award then the award may be withdrawn by QQI or the provider to whom, under section 53, authority to make an award has been delegated. QQI Policy and Criteria for Making Awards." (QQI, 2017).

consistently across all provision. Such policies must set out clearly expectations of all members of the community with regard to protecting academic integrity and to informing and educating staff and learners about academic integrity, thereby protecting them and others from the repercussions of engaging in academic misconduct.

QQI also expects that providers of QQI awards incorporate safeguards to ensure the protection and maintenance of academic integrity incorporated within all other internal policy infrastructure. These expectations extend to the monitoring, detection and investigation, internal recording and reporting of academic and research misconduct and compliance with QQI requirements to report information on policy revision and update, qualitative information (through the AQR) and quantitative summary information on academic and research misconduct (in particular, contract cheating) within the provider (see 'Monitoring and reporting' section).

Academic integrity considerations will be incorporated within QQI's provider monitoring and review practices, programme validation and other routine QA interactions between providers of programmes leading to QQI awards and QQI. QQI may develop other academic integrity-related policies specific to providers of QQI awards, as appropriate and required.

Providers of further education and training programmes

QQI recognises the importance of ensuring that all national guidelines, policies, processes and instruments are suitable for providers, their staff and learners, across the entire tertiary sector. QQI will liaise with the sector to ensure that it obtains informed input on its strategic objectives regarding academic integrity in the FET sector to ensure the applicability of the national policy approach to that sector. This will include the incorporation of academic integrity considerations within QQI's statutory QA guidelines.

Monitoring and reporting

Reporting by all providers to QQI

Reporting of information relating to academic and research misconduct by providers to QQI can:

- support the development of a comprehensive picture of the nature and extent of academic and research misconduct in the Irish tertiary education system,
- support the implementation of the Council of Europe [Recommendation for Countering Academic Fraud](#), particularly those elements relating to data collection at a national level.
- ensure that QQI and providers are aware of relevant developments and trends that could inform policy and provision, and
- assist providers and their staff to identify how adaptations to teaching, learning and assessment and to student supports may be deployed to support vulnerable student cohorts.

QQI already collects information from providers of higher education and training on academic integrity through the annual quality report (AQR). This information is qualitative in nature and provides detail of activity undertaken by providers to maintain and enhance academic integrity – for example, the development or review of policies and procedures; specific enhancement-led activities to raise awareness among learners and/or staff. QQI will build on existing annual reporting on academic integrity by higher education providers through the AQR process to incorporate quantitative reporting. QQI will introduce both qualitative and quantitative reporting on academic integrity for providers of further education and training, and to listed awarding bodies and their associated providers.

Quantitative reporting will primarily focus on the types and volume of serious academic and research misconduct detected within providers, the disciplines and cohorts impacted, and any other information that could assist QQI and the sector in developing supports for learners and identifying the need for other interventions.

QQI will consult with education providers to ensure that reporting requirements are not overly onerous for providers, and that they provide QQI with sufficient detail to fulfil the above objectives and to allow for evaluation of the impact of QQI's enhancement and regulatory activities over time.

QQI also asks all providers to report to it any information that could support it in identifying individuals or entities providing or facilitating cheating, advertising or publishing advertisements for academic cheating by reporting such instances directly to QQI, as well as cases in which cheating organisations blackmail or extort learners (or attempt to do so). QQI encourages providers, their staff and learners to report content infringing section 43A of which they become aware both directly to the relevant organisation and, where the content represents a particularly serious offence or a new departure in relation to the promotion of contract cheating or academic or research misconduct, to QQI.

As in any data-collection and dissemination activity, QQI will ensure that data collection and processing is conducted within the parameters of the General Data Protection Regulation (GDPR) and will not require that any personal or identifying information relating to individual learners is shared by providers, unless necessary to support the pursuit of legal action.

Summaries of provider reports

QQI will share analyses of the reported data (quantitative and qualitative) with providers periodically to allow them to consider whether there are specific drivers or causes of activity and to whether adaptations to teaching, learning, assessment or student supports may support particular learner cohorts to maintain academic integrity. These analyses will be in addition to QQI's existing quarterly academic integrity updates, which include communications in respect of QQI's regulatory and enhancement activity, as well as a list of services and websites that may be used by learners for the purpose of academic misconduct. QQI will also publish on its website synopses of reports received periodically.

QQI monitoring of advertising, publishing and social media platforms

QQI has established formal monitoring and reporting processes with a number of advertising, publishing and social media platforms and, where possible, will replicate these with further platforms. This activity will be supported by the [Digital Services Act](#). QQI will publish summaries of its monitoring and reporting activities within quarterly academic integrity updates and on its website.

QQI will publish summaries of the outcomes of its reporting processes with advertising, publishing and social media organisations. These summaries will identify the number of pieces of content reported, and of pieces of content removed or restricted in response by the organisations. QQI will apply to the Media Commission to become a 'trusted flagger' under the [Digital Services Act](#) as soon as this is possible.

Stakeholder engagement

Engagement with learners

QQI will engage and collaborate with learners and learner representative bodies, and organisations that support and encourage learner engagement in tertiary education, as well as with providers, to inform, educate and raise awareness of the risks posed by contract cheating and other forms of academic misconduct, and to ensure that QQI's own approach to the regulation and enhancement of academic integrity is informed by current developments and trends. This includes through briefing events, focus groups and individual meetings with representatives of *inter alia* the Union of Students in Ireland (USI) and individual students unions, AONTAS (the national adult learning organisation), the National Student Engagement Programme (NStEP), the Irish Council for International Students (ICOS), Student Affairs Ireland (SAI) and AHEAD. QQI will also have regard to data generated by other national and international bodies to inform its approach to academic integrity regulation and enhancement – for example, data arising from the [national student survey topical model on academic integrity](#).

All engagement will be based on the principle of providing information and education to ensure that learners are in a position to protect themselves from unintentionally engaging in academic misconduct and/or being targeted by bad actors. QQI will consult with learner representatives to determine how best to communicate with learners across the tertiary education sector, including through media and advertising campaigns.

Engagement with staff

QQI will leverage its routine engagement with providers (i.e. quality dialogue meetings, provider monitoring and review, engagement with provider representative bodies) to emphasise the obligations of all staff (academic and professional services) with regard to academic integrity. Through the enhancement-led work of QQI and the provider-led National Academic Integrity Network (NAIN; see below), QQI will consult with provider staff to explore their observations with regard to academic and research misconduct, provide training, and raise awareness of the obligations of individual staff members.

Engagement with social media platforms and other advertising and publication platforms

QQI will engage regularly, constructively and proactively with organisations that may indirectly facilitate contract cheating (i.e. their platforms may be used by facilitators of contract cheating to promote their services and target learners). This engagement will support the formal monitoring and reporting processes that QQI has established with these entities (mentioned above) and aim to ensure that QQI is familiar with the policies and approaches that they use to monitor and safeguard their platforms. It will enable QQI to influence such policy to ensure that it is cognisant

of threats to learners and the national qualifications system from bad actors, including the providers of contract cheating services.

Influencing policy and collaborating with other national agencies impacting on the education and training system

Through its routine strategic engagement with governmental departments, peer state agencies and other regulatory bodies nationally, QQI will highlight the work ongoing throughout the tertiary education sector to promote, enhance and maintain academic integrity. These include, but are not limited to, the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS), the Department of Education (DE), the Higher Education Authority (HEA), SOLAS, professional, statutory and regulatory bodies (PSRBs), and other relevant stakeholders within the education system.

QQI will aim to influence national policy to ensure that sufficient attention and resourcing are provided to the area of academic integrity. It will actively seek out synergies between its work and the work of other state and regulatory bodies to ensure a holistic, coherent and comprehensive approach to embedding a culture of academic integrity across the whole of the Irish education system.

International engagement

QQI will ensure that the Irish system is kept apprised of any international developments in the area of academic integrity through its engagement with peer regulators, qualifications authorities and academic recognition bodies. This includes engagement through established memoranda of understanding and other formal agreements.

Through structured engagement in formal networks, including the Global Academic Integrity Network (GAIN) and the Council of Europe ETINED (Ethics, Transparency and Integrity in Education) platform, QQI will support and engage in research to further the development of common, international approaches to support academic integrity and disrupt the activities of contract cheating service providers.

Research

QQI will ensure a focus on academic integrity within its research activity and programmes – in particular, research related to assessment (see reference above to QQI's Rethinking Assessment programme).

QQI will inform itself, providers, and other stakeholders, of research at national and international levels through its connections with formal and informal networks and communities of practice nationally and internationally.

QQI will support the dissemination of nationally conducted research on academic integrity through its network of contacts.

Enhancement

As highlighted above, enhancement activity supports QQI's regulatory approach and protection of the national qualifications system. It ensures the sharing of information, and development and dissemination of good practice, building resilience across the education sector.

QQI will lead and support awareness-raising activities for providers, learners and staff, other important stakeholders, such as publishers and advertisers, and the general public. QQI circulates both enhancement-related information and information regarding any risks to academic integrity through quarterly academic integrity updates, briefing events and the like.

The National Academic Integrity Network (NAIN), managed by QQI, has developed resources, provides professional development for academic and professional staff, and ensures that the learner voice is incorporated within its activities by actively involving learners and learner representatives.

QQI will liaise with the FET sector to support the adaptation of existing nationally produced resources, as well as the production of new resources, for FET providers and to raise awareness of academic integrity matters among FET providers, their learners and staff.

Review and revision of policy implementation

QQI is cognisant that the area of academic integrity is one that is continually developing and evolving. In an effort to ensure that the manner in which this policy is implemented remains current and relevant, QQI will review the associated implementation plan annually and – informed by consultation with providers, their learners and staff, and other stakeholders, as well as by any trends observed through QQI's monitoring activity – make any adjustment necessary to enhance its effectiveness.