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Tertiary Education Quality and Standards Agency

# Identifying and tackling threats to the integrity of higher education

Dr Helen Gniel

Director

Higher Education Integrity Unit

**TEQSA**  
teqsa.gov.au

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But first, some acknowledgements...

A bit about me....

And some rules of engagement...

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# Outline of the day

- Overview of Australia's higher education system
- Australia's academic integrity story
- The Higher Education Integrity Unit
  - Scope, funding and projects
- Workshop 1 – Academic integrity and academic fraud
  - Commercial academic cheating
  - Intersection of risks
- Workshop 2 – The impact of generative AI
  - Australia's legislative imperatives
  - Internal and external quality assurance
  - Rethinking assessment



# Context: an introduction to Australia's tertiary education system

## The AQF

Level 10	Doctor
Level 9	Master
Level 8	Grad Cert Honours
Level 7	Bachelor
Level 6	Assoc Deg Adv Dip
Level 5	Diploma
Level 4	Cert 4
Level 3	Cert 3
Level 2	Cert 2
Level 1	Cert 1

HIGHER  
EDUCATION

TEQSA

42 Australian Universities
1 Overseas University
6 University Colleges
149 Institutes of HE

< 200  
providers

> 4,000  
providers

ASQA

VOCATIONAL  
EDUCATION

## Australian tertiary education – size and scale

- Around **1.6 million students** in total
- Around **840,000 domestic undergraduate** enrolments
  - 94% in Australian Universities
- Around **250,000 postgraduate coursework** enrolments
- Around **450,000 international** students
  - 89% in Australian Universities
  - 182 source countries
    - 36% China
    - 12% India

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# INTERNATIONAL STUDENT NUMBERS

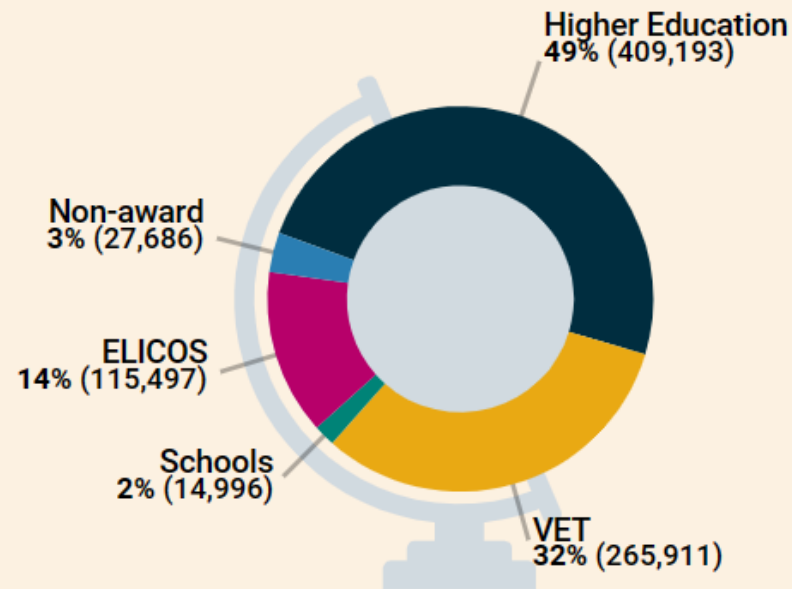


## 710,893

INTERNATIONAL STUDENTS  
IN JANUARY-JULY 2023



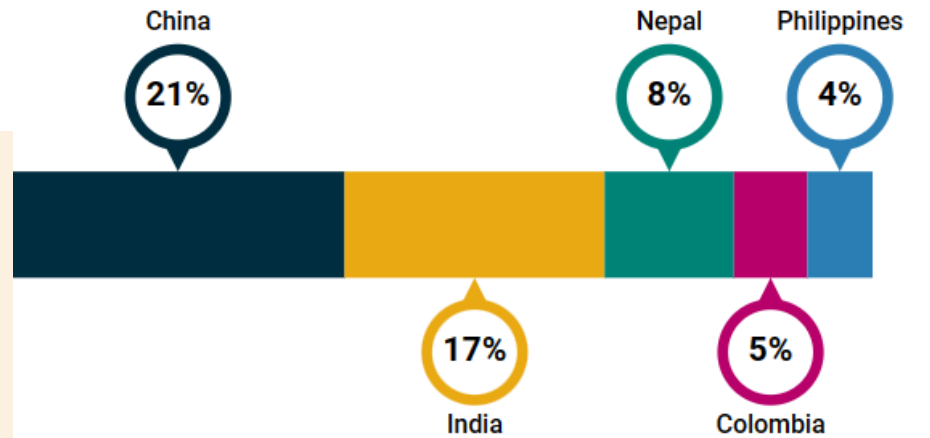
This is **34% more**  
students than  
in January-July 2022



## TOP FIVE COUNTRIES

# 55%

OF INTERNATIONAL STUDENTS  
ARE FROM THESE  
TOP FIVE COUNTRIES



Source: Department of Education, PRISMS

TEQSA's purpose is to deliver quality assurance that **protects the interests of students** and the **reputation and standing** of Australian higher education



Monitoring compliance with the *Higher Education Standards Framework* and the *ESOS Framework*



Identifying and assessing risks to the sector



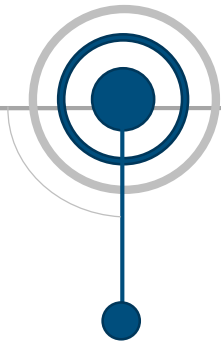
Sharing information, guidance and best practice

# Academic integrity - a brief history

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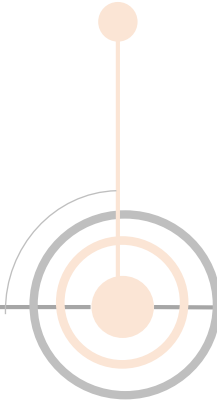
## 2014

Contract cheating website based in Sydney, Australia



- TEQSA wrote to all higher education providers alerting them to the risk to academic integrity seeking responses to management of website issues

- Some providers undertook more extensive investigations

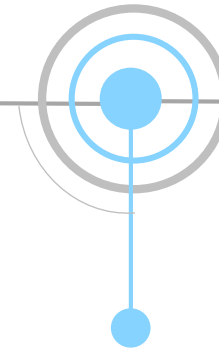


## 2015

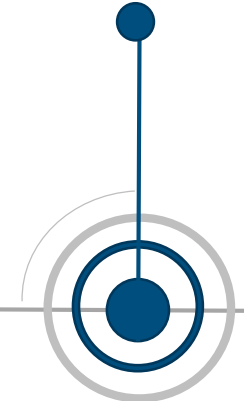
TEQSA reports on initial responses

## 2015

TEQSA reviewed provider submissions in light of the 2015 Higher Education Standards Framework (HESF)



Committed to the development of further support resources.  
Released a revised guidance note on academic integrity



## 2016

Standards relating to academic integrity within the core set of standards for assessment

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# Academic integrity - a brief history

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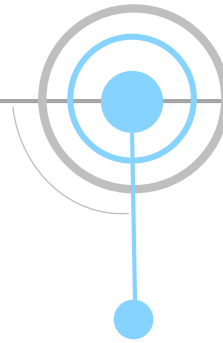
2017

TEQSA published the *Good Practice Note: Addressing contract cheating to safeguard academic integrity* published

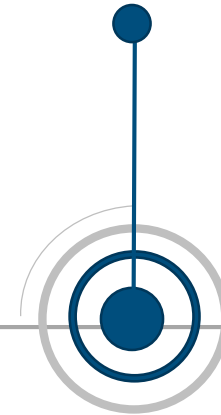


2019

INQAAHE grant for quality assurance agencies toolkit (released in July 2020)

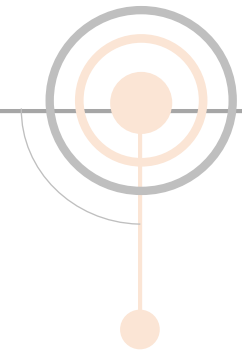


- Academic integrity toolkit officially launched October 2020



2020

Legislation was introduced in September this year making the provision of contract cheating services illegal in Australia



2018

TEQSA obtained Australian Government funding to take on a national role tackling contract cheating and academic integrity

2019  
Academic integrity workshops for providers  
Australia (19)  
New Zealand (2)  
Webinars (2)

Establishment of Integrity Unit

## The creation of the Higher Education Integrity Unit (HEIU)

- A recognition by the Minister that TEQSA needed additional funding to consider **sector-wide** or 'thematic' issues
- Coincided with Australia outlawing advertising or supply or academic cheating services (Sep 2020)
- Annual quarantined funding for 7 staff plus project money
- Commenced operations in Jan 2021
- At its heart, the HEIU is a **research, support and best practice** unit

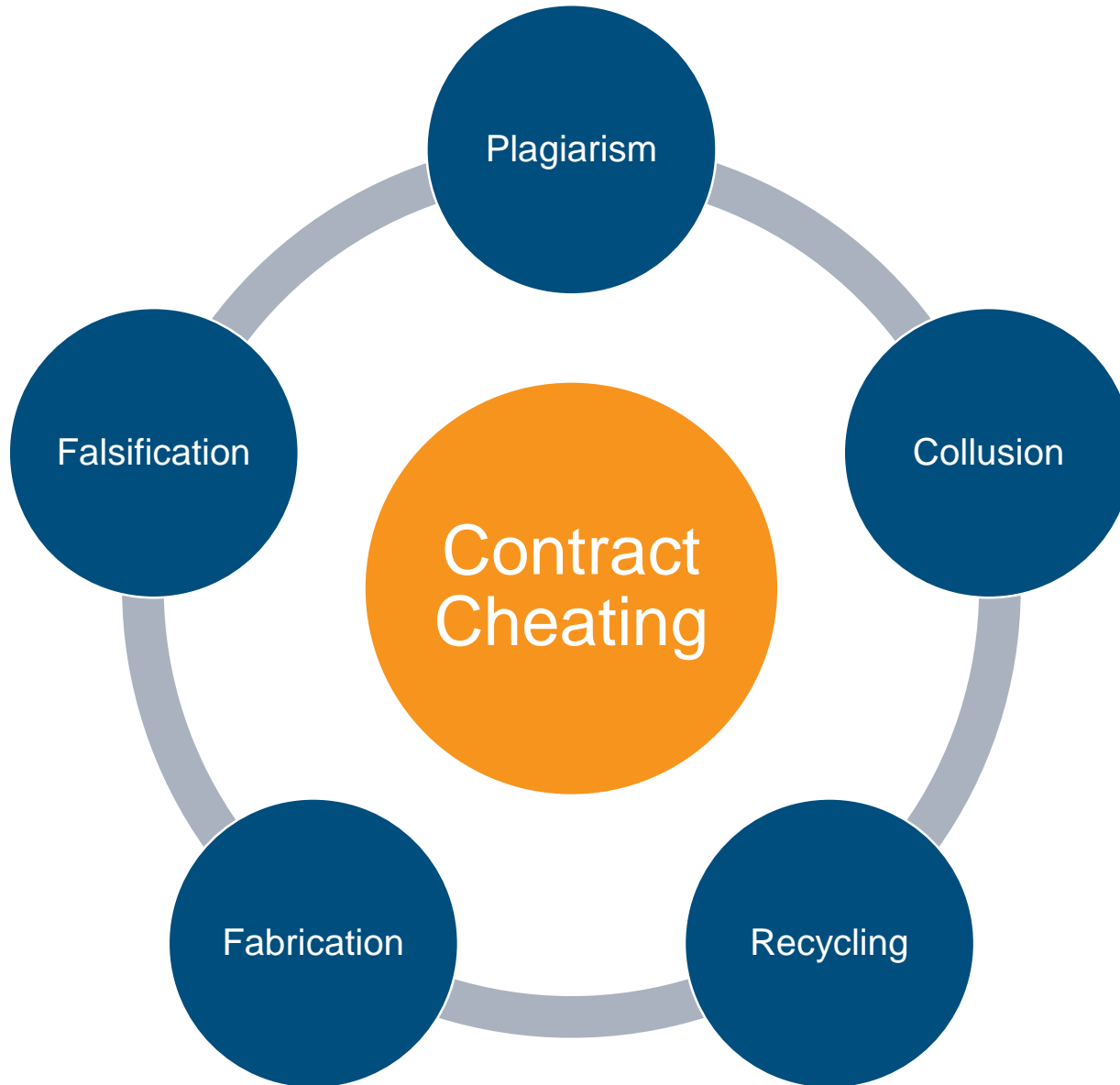
# Thematic issues in the sector



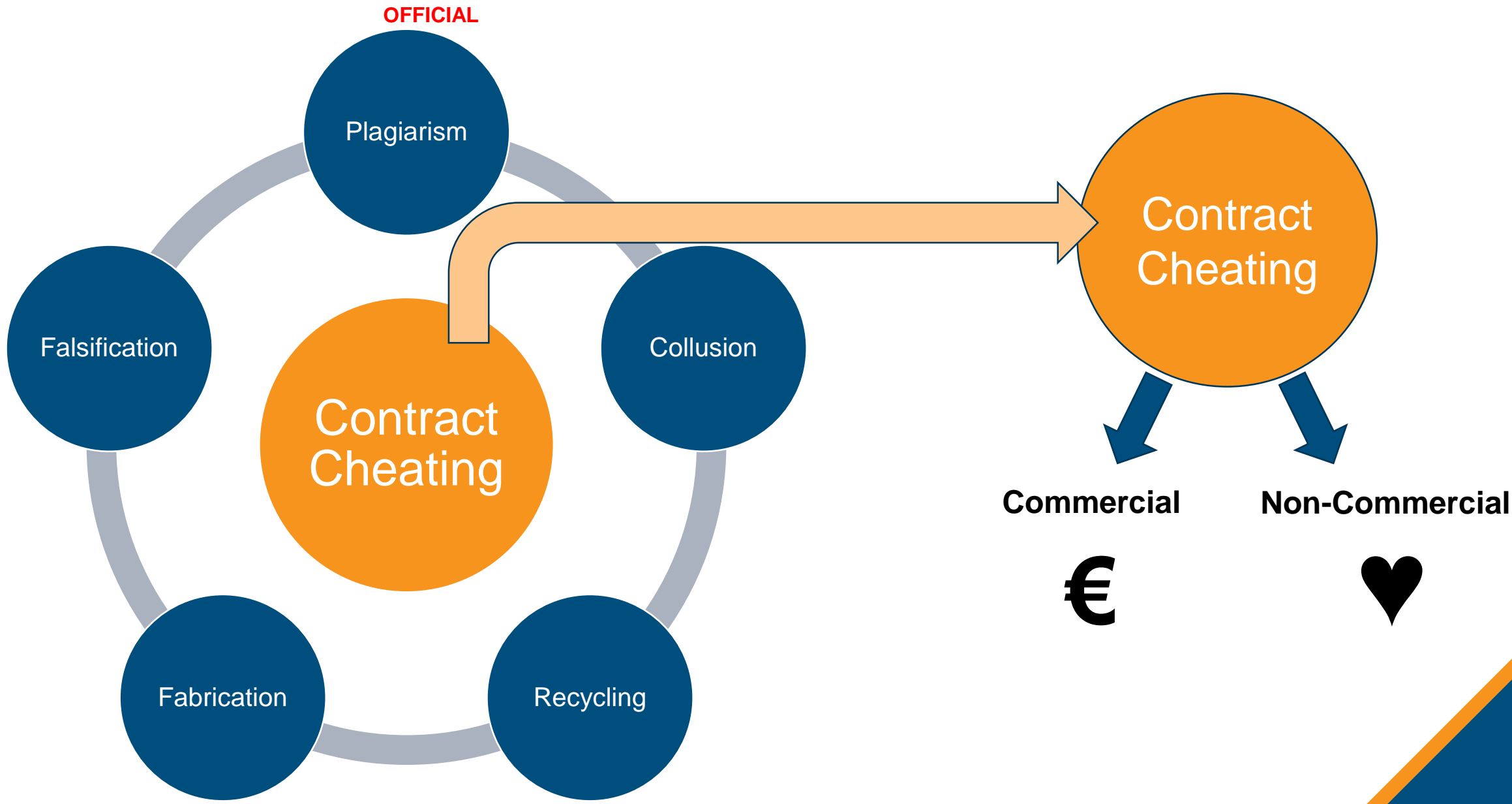
# Thematic issues in the sector

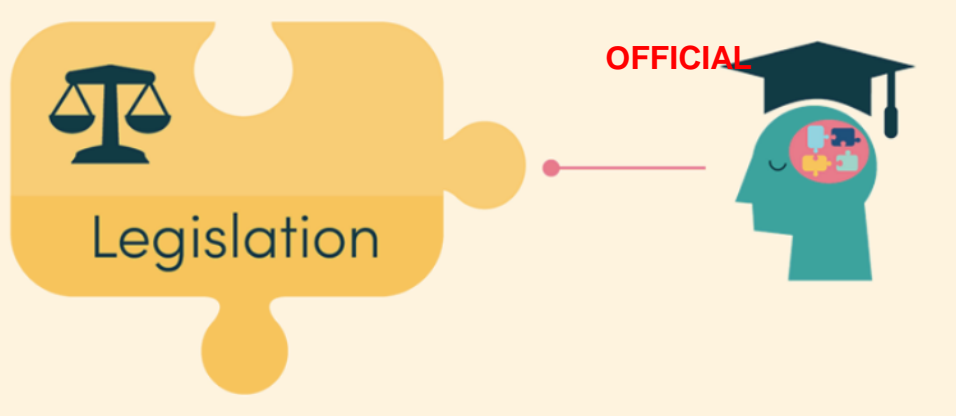


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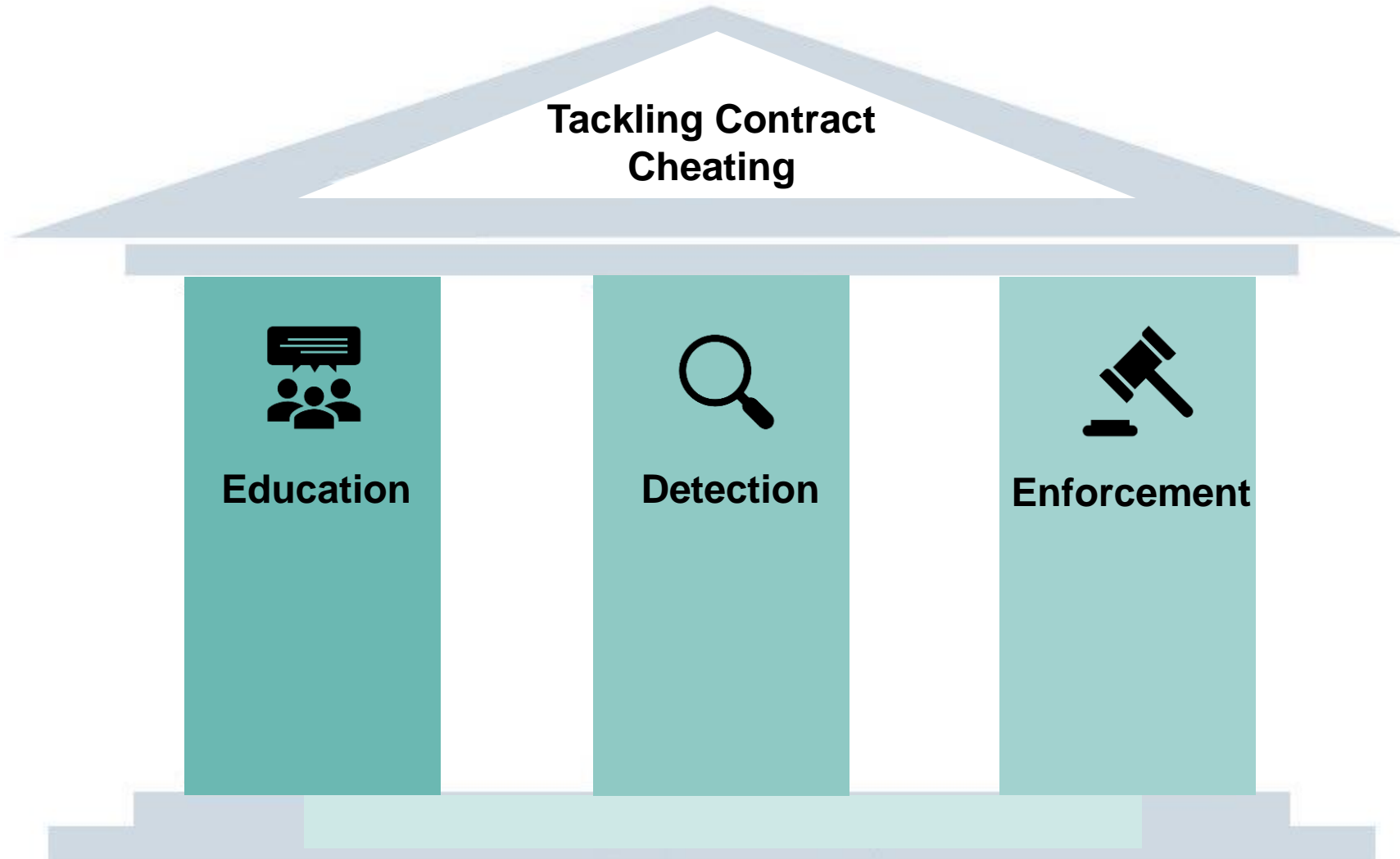
- ❖ Australian legislation passed in **August 2020** makes it an **offence** to **provide or advertise** academic cheating services in higher education
- ❖ The legislation is aimed at those **who provide cheating services**, not at students
- ❖ The offences and penalties the legislation creates apply whether the services are provided **from within Australia or from overseas**
  - Up to **two years in jail** or **AU \$110,00 fine**
  - Applications for **injunctions** to block website access

## What is the scale of the cheating industry?

- Global industry with estimated worth > USD 1 billion
- Targets students in every jurisdiction, every type of institution, every level of award
- In Australia, research suggests
  - ~10 % of students have contract cheated
  - likely an underestimate
  - providers are mostly poor at catching cheating



# The Three Pillars



CHEATING is NEVER the RIGHT ANSWER  
teqsa.gov.au/cheating

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0:36

Cheating is never the right answer: Lucy's story



0:33

Cheating is never the right answer: Sue's story

आपकी भाषा कोई भी हो,

ऑस्ट्रेलिया में शैक्षणिक बेईमानी

सेवाएँ गैर-कानूनी है



Identifying, avoiding and reporting illegal cheating services

## Do your own work.

Providing academic cheating services to students at Australian institutions is against the law.

Do not write essays, complete assignments or sit exams for other students.

You risk criminal prosecution including 2 years in prison and up to \$110,000 in fines.



Remember: If you are having trouble with your assignments, contact your lecturer or tutor for help.

Advice for students: Employment offers from online study platforms

CHEATING is NEVER the RIGHT ANSWER  
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[teqsa.gov.au/cheating](https://teqsa.gov.au/cheating)



## Introducing the course

This course has a total of six self-paced online modules.

Select each module for a brief description.

The nature of the problem: supply and demand

Policies and procedures

Procedural fairness

Roles and responsibilities

Data sources

Interviewing students

## Substantiating contract cheating: A guide for investigators

Substantiating contract cheating for symbol-dense, logical responses in any discipline, particularly mathematics

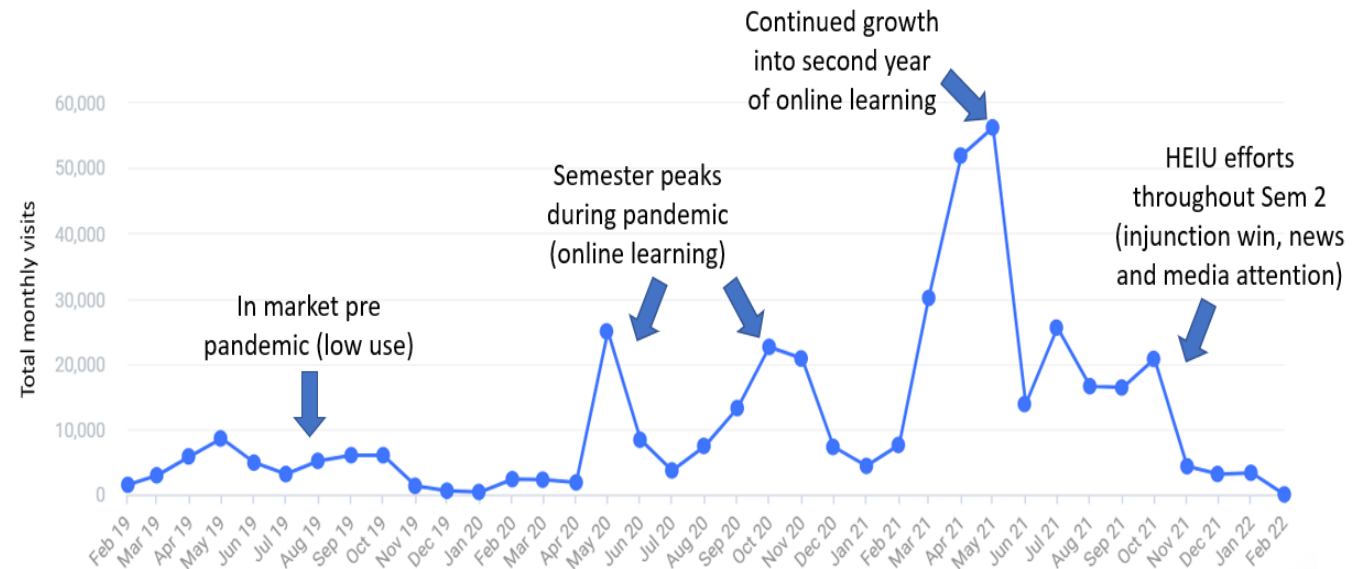
A guide for investigators

## ➤ Detection

- ❖ Commercial cheating service providers
  - ❖ Database of >2,300 sites **suspected** of offering cheating services
  - ❖ Around 600 sites targeting students studying with Australian higher education providers
  - ❖ Shared with Australian providers every 6 months

## Web traffic analytics

- Triage sites for enforcement action
- **Identify seasonal peaks**
- Identify search terms students use
- Identify social media referrals
- **Track effectiveness of interventions**
- Identify related and mirror sites



## ➤ Enforcement

### Federal Court action – Sep 2021

- Assignmenthelp4you.com

### Protocols with ISPs – July 2022

- All major ISPs, covering 98% of the market

### Bulk disruption requests – several/year

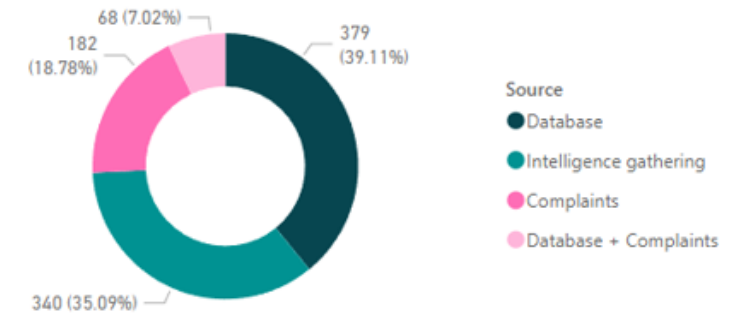
- Over 290 websites now blocked
- Covering over 70% of all internet traffic to these sites
- Timed for peak impact

*The next frontier: file-sharing websites*

Social media reporting by quarter

Year	Quarter	Accounts reported
2021	Qtr 2	297
2021	Qtr 3	196
2021	Qtr 4	243
2022	Qtr 1	92

Source of social media accounts



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# Workshop 1

## Supporting academic integrity through collaboration within and between institutions and countries

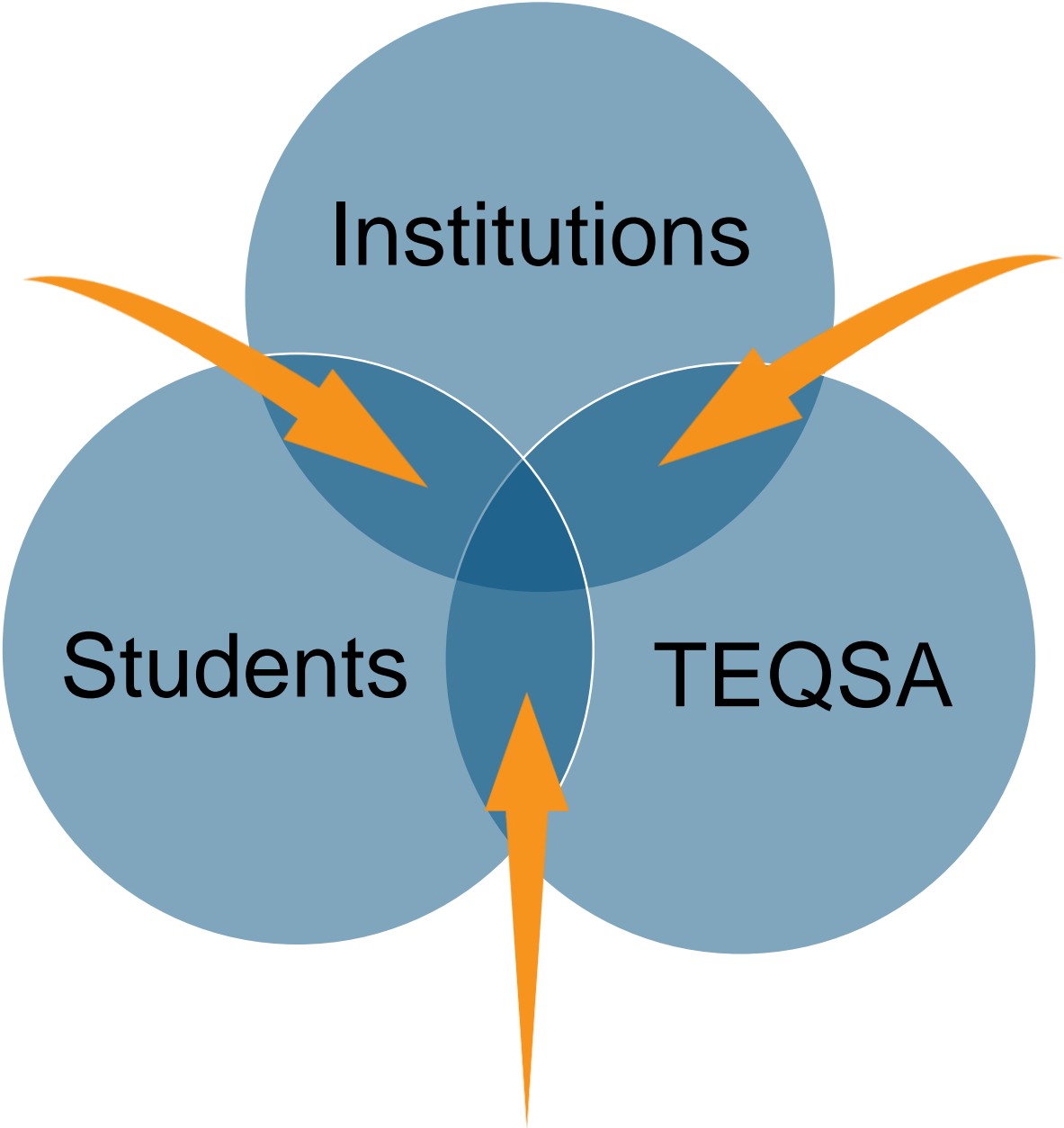
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## Global collaboration



- Established October 2022
- 8 foundation members
- Quarterly meetings

- Australia
- Ireland
- New Zealand
- England
- Italy
- Kazakhstan
- Kosovo
- Lithuania
- Kenya
- South Africa
- Zambia
- Hungary
- Canada
- Romania
- Spain
- Ukraine



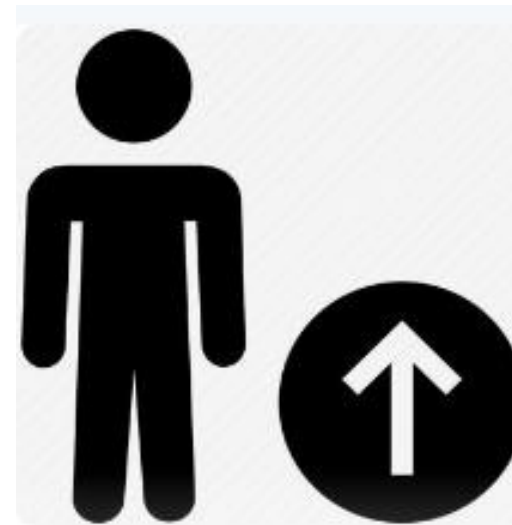
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Now it's time to do some work....



Source: VectorStock

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# Quick game of heads and tails

**Hands on heads – YES**

**Hands on hips - NO**

**WAIT for the count of three to vote**

Hands on heads – **YES**

Hands on hips - **NO**

**Question 1: Contract cheating happens in Cyprus**

**Question 2: Contract cheating is disallowed in policy**

**Question 3: Staff would know how to detect contract cheating**



# Academic Integrity in Cyprus

What do you think are the **top three types** of academic misconduct in Cyprus?

How are **students** in your institution taught about studying with integrity?

What are **staff** in your institution taught about studying with integrity?



Source: VectorStock

Based on your table discussions....

....what are three actions that could enhance staff and student understanding of academic integrity at your institution?

## Australia's approach to tackling **commercial** academic cheating

Australia's legislation **only applies** when academic cheating services that are provided or advertised for a **commercial** purpose

Yet research tells us that **this is far less common** than non-commercial provision of cheating services.....



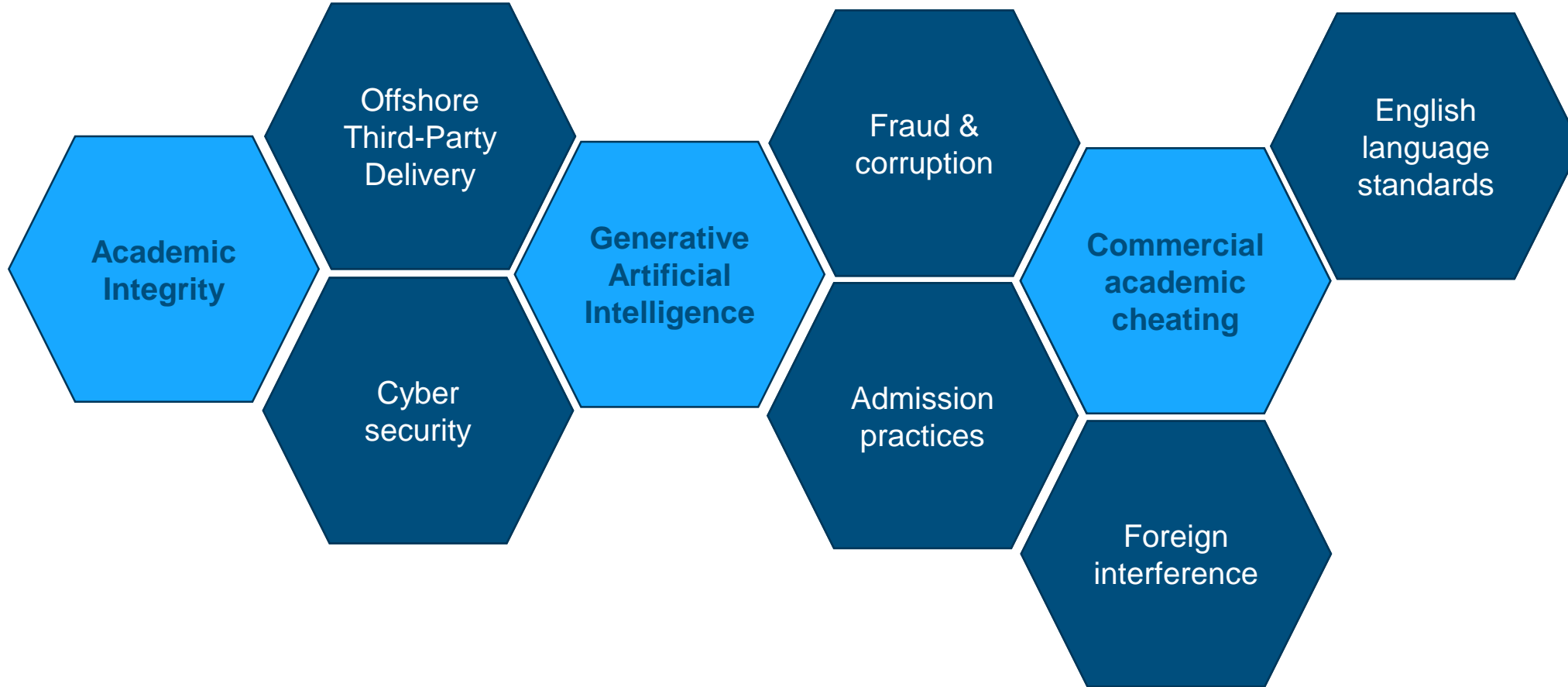
**Is there a moral distinction between these types of provision?**

**Should the student who outsources their work face a different penalty depending on whether they paid a fee?**



Source: VectorStock

# One big difference - Intersection with other risks





## Intersection with other risks

### **Consider, for a student, the potential consequence of cheating:**

- Failure of unit, failure of course, financial impact
- Some students engage in contract cheating multiple times
- Expulsion from university, loss of visa

### **And if students are not caught while at university:**

- Revocation of degree, loss of licence to practice
- Increased risk of blackmail

### **Now consider what we know about the industry**

- Sophisticated, organised, well resourced
- Highly interconnected, tracing back to a small number of 'home bases'
- Global "hot spots"
- Essay writing is not their only service.....

# Intersection with other risks

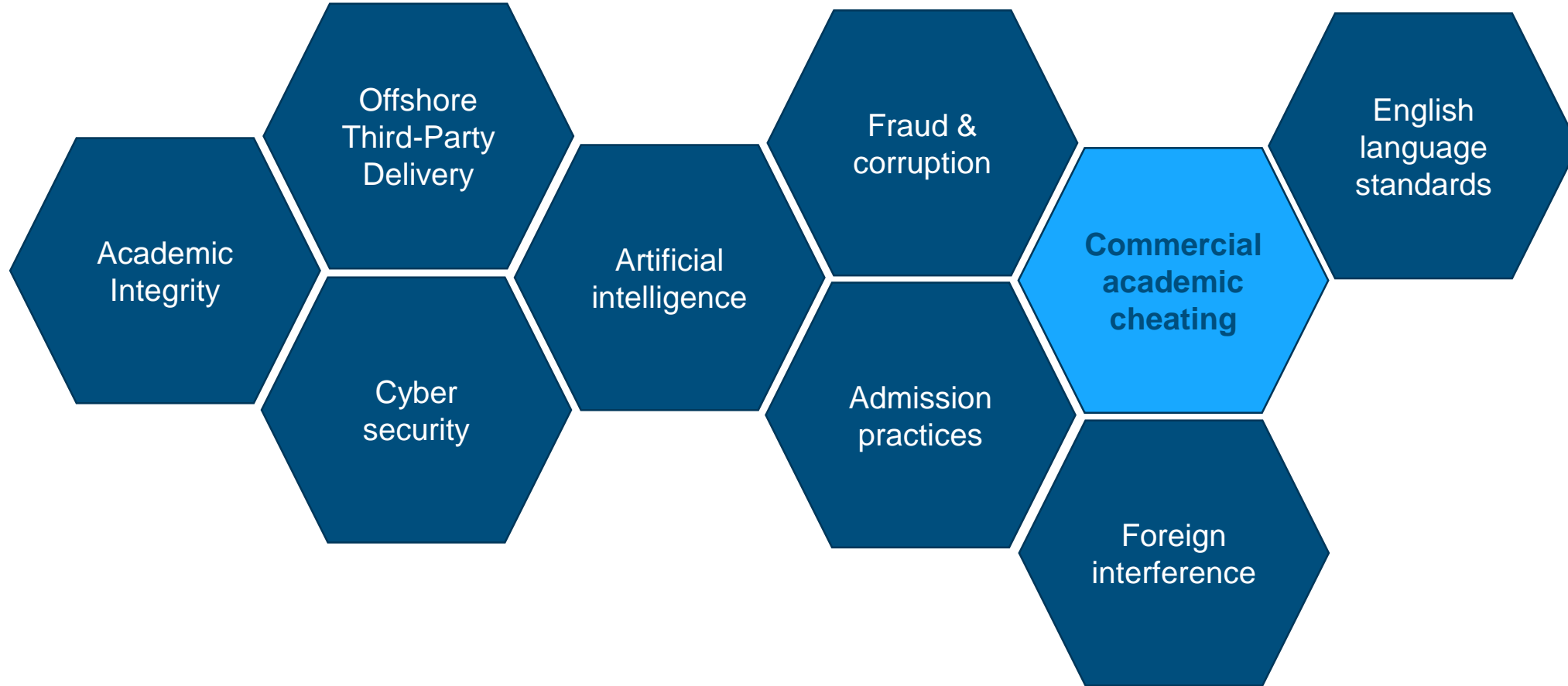
## What information does the cheating firm hold?

- Student details
  - Name, institution course, subject, phone number, payment details
  - LMS log in details – student ID number and password

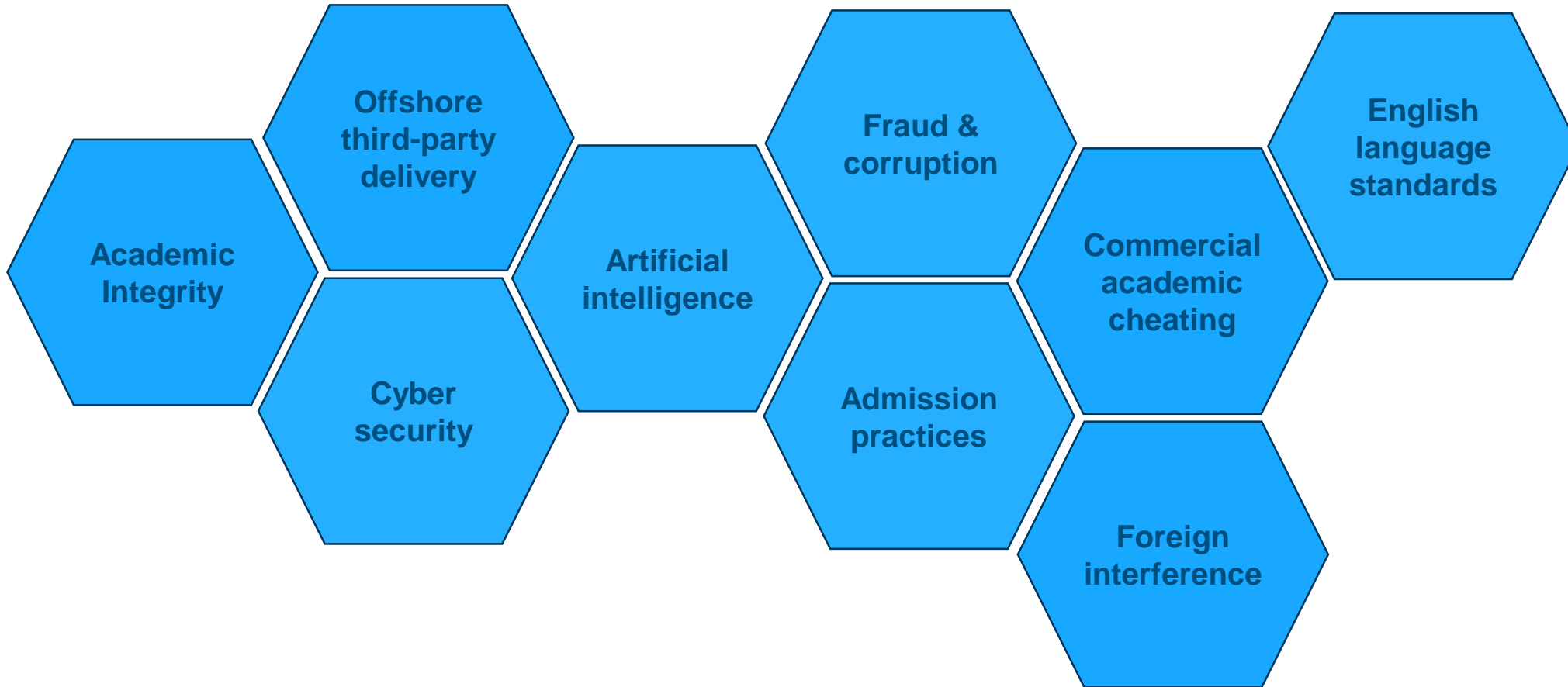
## What can they do with it?

- Ongoing access to content
- Access to other students
- Access to institutional systems
- Blackmail – money or leverage

# What else is connected?



# What else is connected?



# Practical actions to enhance academic integrity

- 1 Clearly define types of academic misconduct in institutional policy
- 2 Communicate the types of breaches with examples to students
- 3 Provide a supportive learning environment for students
- 4 Provide training for staff on academic integrity
- 5 Create clear processes and flow charts for suspected misconduct

# Practical actions to enhance academic integrity

6

Ensure staff review and refresh assessment tasks

7

Grow a positive academic integrity culture

8

Establish, grow or join an national academic integrity network

9

Conduct research to understand AI in the local context

10

Record academic misconduct cases and report trends

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# Workshop 2

## Rethinking assessment for the world of artificial intelligence

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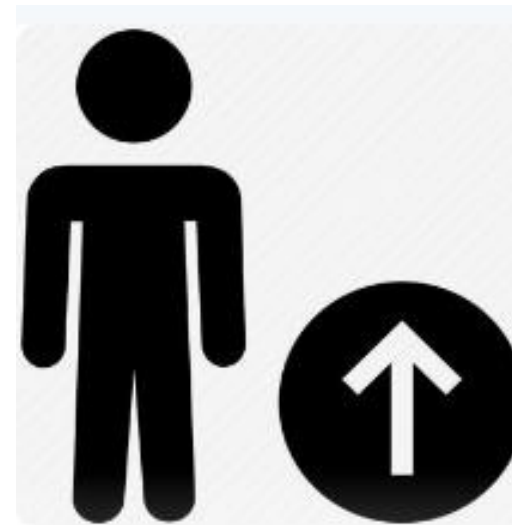
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Now it's time to do some work....



Source: VectorStock

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You know how this works....

Hands on heads – **YES**

Hands on hips - **NO**

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**WAIT for the count of three to vote**

Hands on heads – **YES**

Hands on hips - **NO**

**Question 1: I have experimented with generative AI tools**

**Question 2: AI detection tools can accurately identify AI use**

**Question 3: Staff can accurately determine if AI was used**

**Question 4: I feel confident staff are keeping up to date on AI**

## *Insights from the Australia's National Roadshow*

Participants were asked, when thinking about generative AI:

- What excites you the most?
- What scares you the most?
- What support do you need?

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# The opportunities and risks of generative AI



What does the regulatory landscape require of higher education providers in Australia?

# Relevant standards from the HESF



Methods of assessment are consistent with the learning outcomes being assessed and the level of study



Students are only awarded a degree when they have demonstrated achievement of the learning outcomes



Preventative action is taken to mitigate foreseeable risks to academic integrity and students are provided with guidance on what constitutes academic misconduct



Academic oversight assures the quality of teaching & learning by maintaining oversight of academic integrity and monitoring of potential risks

## Early support centred around prompting institutions to consider:



Do your current methods of assessment still provide the necessary assurance of demonstrating learning outcomes?



Are the learning outcomes still the right ones?



How can employers, the public and professional bodies be confident that graduates have acquired the necessary capabilities and knowledge?



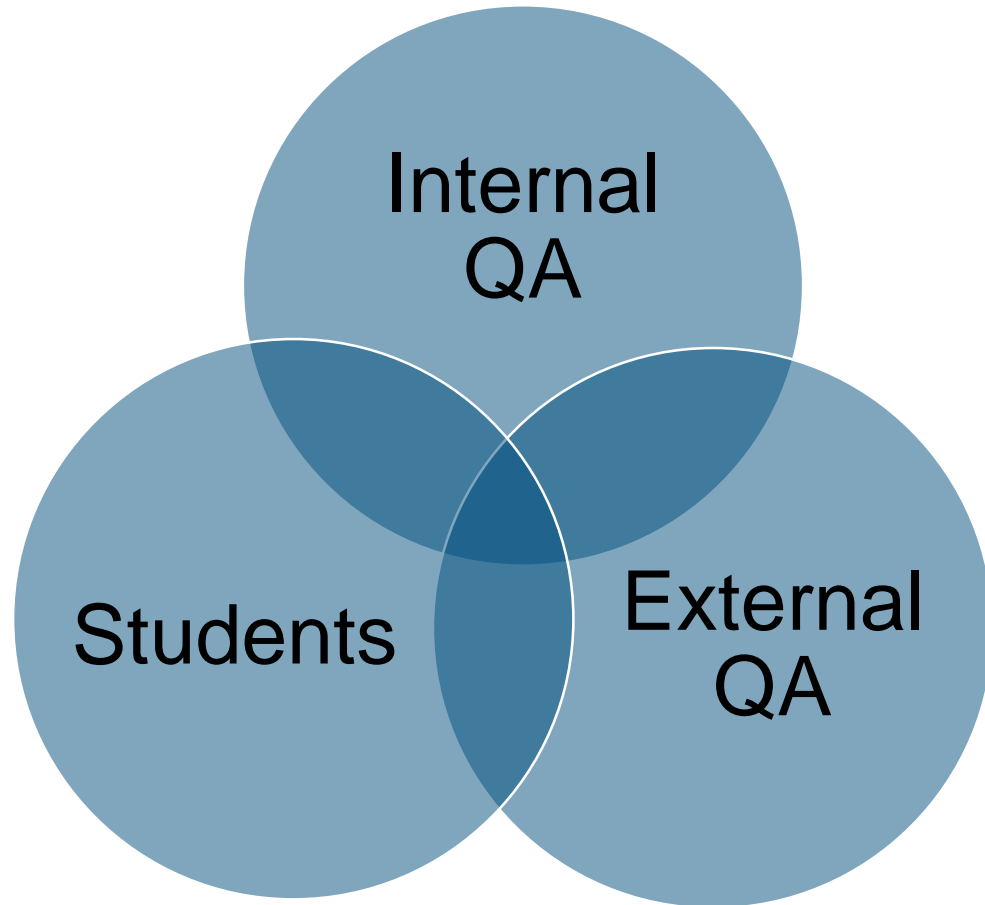
What are the implications for professional accreditation, and are these being proactively identified and managed?



Are your staff equipped with the necessary capabilities and support to effectively adapt their teaching and learning activities?



If rules or expectations are going to differ by discipline, how are you documenting your reasoning and decisions for the differences?



What should **internal** QA be focusing on?

What should **external** QA be focusing on?

What are the **student** responsibilities?



## *Responses from Australia*

Workshop participants were asked....

### **When thinking about generative AI:**

- What **excites** you the most?
  - Reduced administrative burden, higher quality work from students, personalised learning support for students
- What **scares** you the most?
  - Concerns about academic integrity, impact on English language proficiency/attainment, being too risk averse to realise opportunities, robot overlords, mass surveillance, lack of detection software
- What **support** do you need?
  - Help to rethink assessment and centralised resources

# TEQSA Assessment Experts Forum:

## *Rethinking assessment in the age of artificial intelligence*

Sydney Australia, August 2023

- 18 participants (including me) at a two-day retreat
- Led by Associate Professor Jason Lodge and Professor Sarah Howard
- **Objective:** to develop a set of guiding principles that will support institutions mitigate the risks to their assessments while also exploring opportunities for incorporating generative AI in to their education programs

# Starting Propositions for the Forum

Generative AI is here now, here to stay, and will only get more sophisticated

Banning AI is neither feasible nor desirable, so students need to learn **about** and with **AI**

**AI literacy arises not (only) through consumption but from interaction**

**Requires pedagogically sound and meaningful use of AI**

With individual artefacts being readily produced by AI, assessment judgments need to be informed by **multiple observations**, over **time** and **context**, to build a narrative that is **trustworthy**

We aim to give the sector **a compass, not a map**

**We don't know what the picture looks like, and it will keep changing**

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Effective  
use of AI

Effective  
but  
Inappropriate

Effective  
&  
Appropriate

Inappropriate  
use of AI

Appropriate  
use of AI

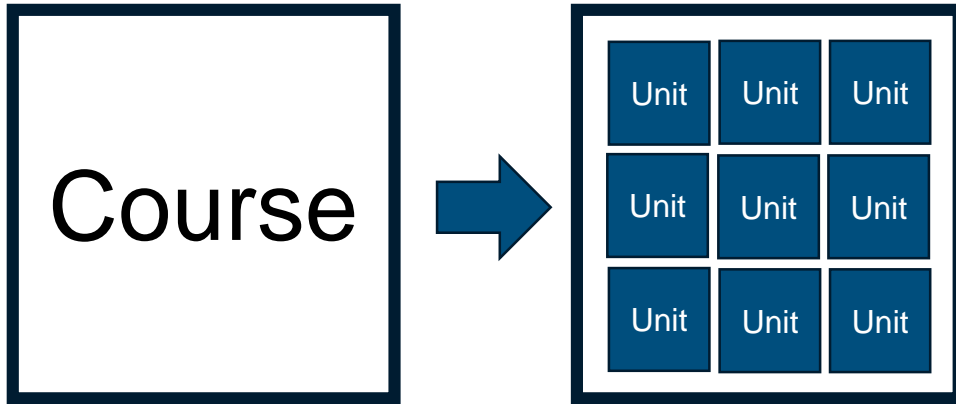
Ineffective  
&  
Inappropriate

Appropriate  
but  
Ineffective

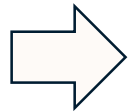
Ineffective  
use of AI

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## CURRENT STATE



Learning outcomes described at course level



Course taught and assessed at the **unit level**. Minimal distinction of assessment OF learning versus assessment FOR learning

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# Pre-generativeAI era

**IPNUT:  
Assessment  
task set at unit  
level**

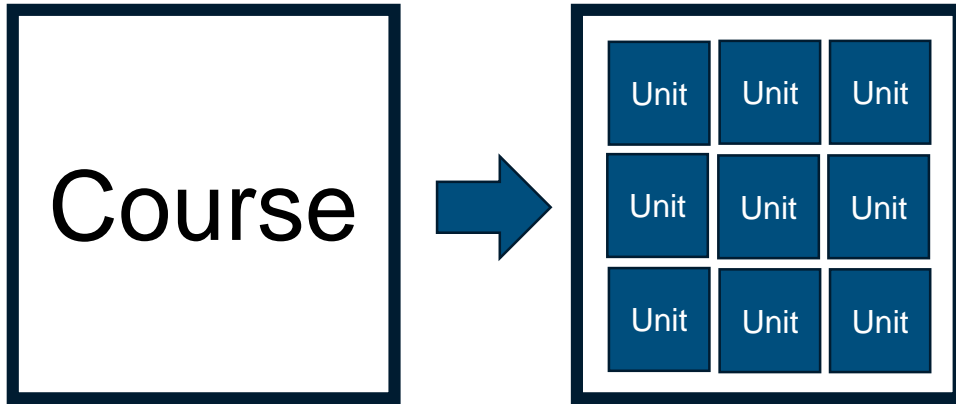
**Assumed process of learning through passing of units**

**Artefact  
marked**

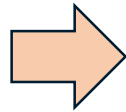
**Sum of  
units = award**

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## CURRENT STATE

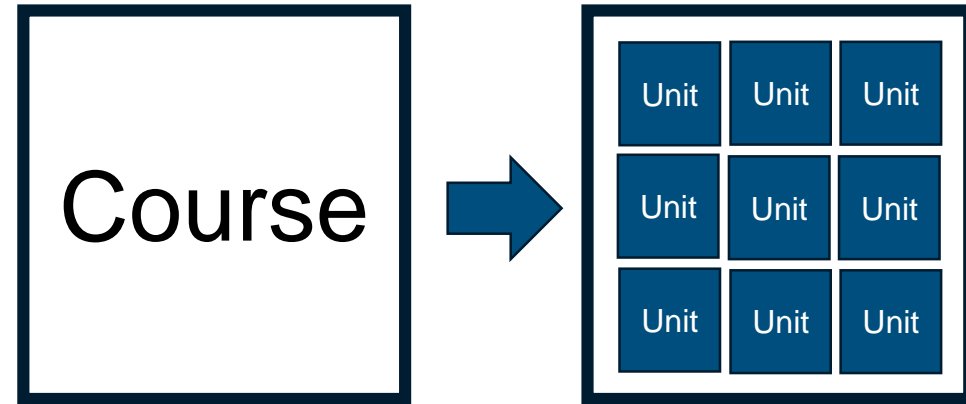


Learning outcomes described at course level



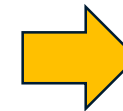
Course taught and assessed at the unit level. Minimal distinction of assessment OF learning versus assessment FOR learning

## PREFERRED STATE



Learning outcomes described at course level

For each LO, identification of **what** is being assessed, **when** it should be assessed, and **how**

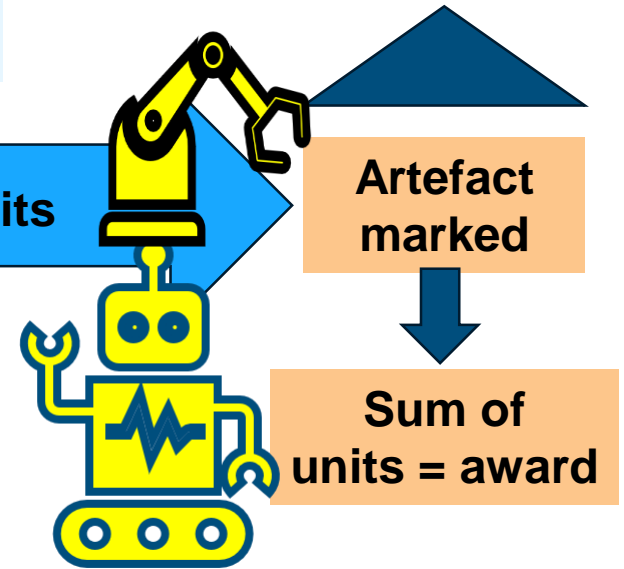


Assessment OF learning placed at strategic points in **course**.  
Assessment FOR learning occurs at the unit level, to support achievement of AOL tasks.

# Pre-generativeAI era

**IPNUT:**  
Assessment  
task set at unit  
level

Assumed process of learning through passing of units





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# Pre- generativeAI era

**IPNUT:**  
Assessment  
task set

Assumed process of learning

Artefact  
marked

# GenerativeAI era

**INPUT:**  
Assessment  
task set

Evidenced student effort and process of learning marked

Artefact  
produced

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Lane 1 – Assessment **FOR** Learning

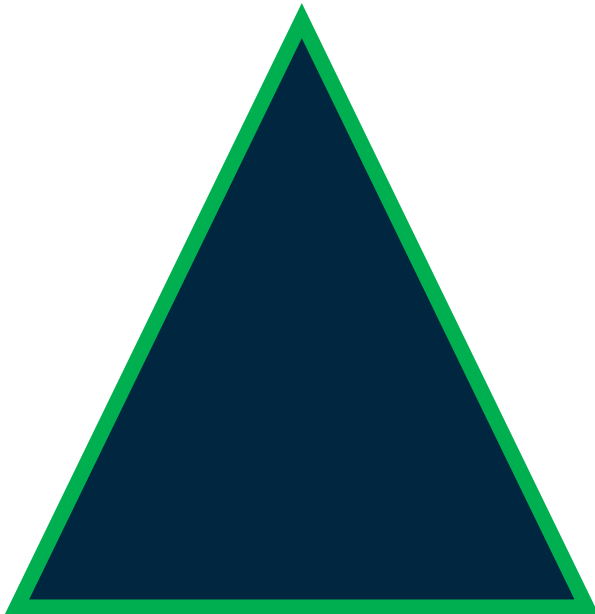


Frequent, low stakes,  
may be automated

Lane 2 – Assessment **OF** Learning



Few, high integrity, high  
validity



- ✓ Work placement
- ✓ Interactive oral assessment
- ✓ Observed clinical skills evaluation (OSCE)
- ✓ Invigilated exam
- ✓ Practical exam
- ✓ Moot court
- ✓ Performance
- ✓ Portfolio

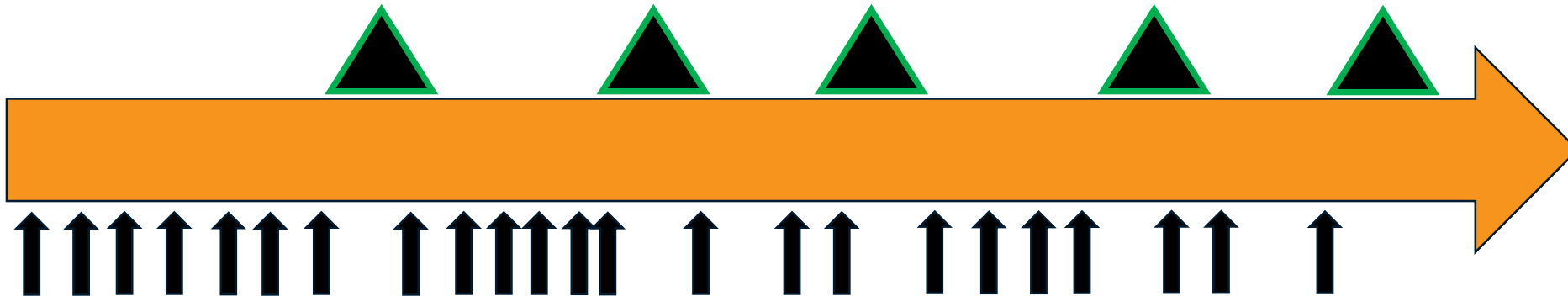
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Lane 1 – Assessment **FOR** Learning 

Frequent, low stakes,  
un-invigilated, may be  
automated

Lane 2 – Assessment **OF** Learning 

Fewer, high assessment  
integrity, high validity



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# Considerations <sup>OFFICIAL</sup>

**The sector needs to stop doing what is futile, to do what is needed**

**Repurposing of assessment effort and resourcing**

**Existing assessments are a resource but many can not be secured**

**Professional accreditation could be either a handbrake or a lever**

**Staffing profile may look different**

**Institutions can't do everything, everywhere, all at once**

**Institutions need to apply a risk lens to their course profile**

**Courses already strong on programmatic assessment (e.g teaching, medicine, nursing) are lower risk – but probably still have room for improvement**

**“Choose your own adventure” degrees (e.g Arts, Business) are higher risk**

**May require a mix of process aligned with cyclic course review or immediate intervention, depending on risk profile or course and phase of cycle.**

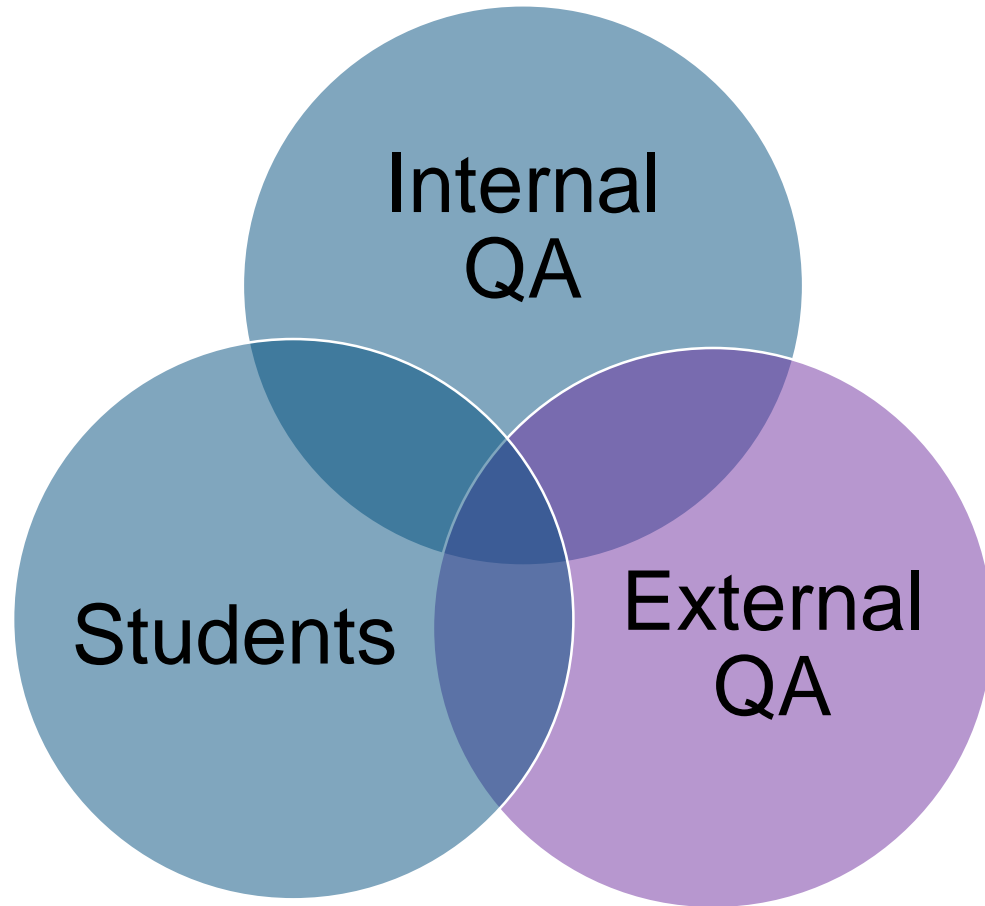


What would you need to transform assessment at your institution?

List as many internal and external factors that you can think of



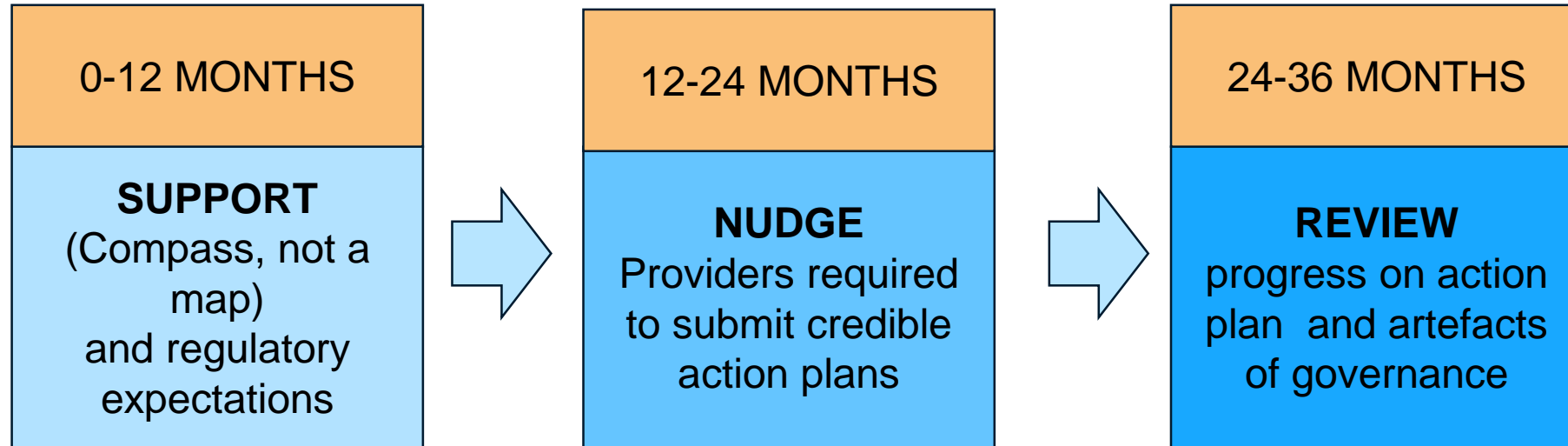
Source: VectorStock



- Create the authorising environment
- Create the urgency
- Drive national consistency
- Support the sector with resources

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# TEQSA's strategy



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# TEQSA's strategy

<b>Nov 2022</b>	<b>Dec 2022</b>	<b>Jan 2023</b>	<b>Feb 2023</b>	<b>March 2023</b>
ChatGPT launched		Letter to providers	Webinar 1	Webinar 2
<b>April 2023</b>	<b>May 2023</b>	<b>June 2023</b>	<b>July 2023</b>	<b>Aug 2023</b>
		Webinar 3	Webinar 4	Assessment Forum
<b>Sep 2023</b>	<b>Oct 2023</b>	<b>Nov 2023</b>		
Principles for Assessment Reform launched	Consultation on the Principles	Final principles will be launched at TEQSA conference		

0-12 MONTHS

**SUPPORT**  
(Compass, not a map)  
and regulatory expectations

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# TEQSA's strategy

October 2023

Letter from TEQSA's Chief Commissioner to the Vice-Chancellor/CEO of all providers

- Inviting consultation on the Assessment Principles
- Foreshadowing a **June 2024 RFI** that will request credible, institutional action plans for addressing the risk generative AI poses to the integrity of higher education awards

12-24 MONTHS

**NUDGE**

Providers required to submit credible action plans

# The Principles for Assessment in the Age of Artificial Intelligence

## Two guiding principles

### 1. Assessment and learning experiences equip students to participate ethically and actively in a society pervaded with AI

AI represents a catalyst for change unlike anything else in the past. It does not just influence how students learning can be assessed, it also influences what is worth assessing and, consequentially, what and how students learn. This necessarily includes the ability to use AI tools, as well as a broader understanding of the ethics, limitations, biases, and implications of AI.

### 2. Forming trustworthy judgements about student learning in a time of AI requires multiple, inclusive and contextualised approaches to assessment

There is no single assessment type that can account for all desirable and undesirable uses of AI by students. Using multiple assessments of different types, when triangulated, provides greater trustworthiness and allows for practices that are more inclusive.

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Two guiding principles and five propositions **that assessment should emphasise**

1. ...appropriate, authentic engagement with AI
2. ...a programmatic/systematic approach aligned with discipline and qualification values
3. ...the process of learning
4. ...opportunities for students to work appropriately with each other and AI
5. ...security at meaningful points across a program to inform decisions about progression and completion