Contract cheating in higher education - prevention, detection, disruption and legislative options
22nd May 2019

Seminar support by **Turnitin**

Contents

Please be advised that speakers' PowerPoint presentations are included within the transcript itself, just beneath the relevant speaker's text. Please note that not all speakers are able to grant permission for us to include their slides.

About this Publication

This publication reflects proceedings at the Westminster Higher Education Forum Keynote Seminar: Contract cheating in higher education - prevention, detection, disruption and legislative options held on 22nd May 2019. The views expressed in the articles are those of the named authors, not those of the Forum or the sponsors, apart from their own articles.

Although Westminster Higher Education Forum is grateful to all sponsors for the funding on which we depend, participation in events and publications is never conditional on being a sponsor. As well as funding ongoing operations, sponsorship enables the Forum to distribute complimentary copies of publications, and offer complimentary tickets for events, to Government ministers, parliamentarians and officials most involved in policy.

This publication is copyright. Its copying, in whole or in part, is not permitted without the prior written consent of the publishers. However, extracts of the text may be reproduced for academic or review purposes, subject to the conditions of use outlined in the previous page, providing they are accurate, are not used in a misleading context and the author, their organisation and the Westminster Higher Education Forum are acknowledged. We would also appreciate being informed.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options
Timing: Morning, Wednesday, 22nd May 2019
Venue: Royal Over-Seas League, Over-Seas House, Park Place, St James's Street, London SW1A 1LR
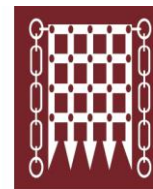
8.30 - 9.00   Registration and coffee

9.00 - 9.05   **Chair's opening remarks**
Lord Storey, Liberal Democrat Lords Spokesperson (Education)

9.05 - 9.25   **The underlying causes of academic cheating**
Dr Thomas Lancaster, Senior Teaching Fellow (Student Support), Imperial College London
Questions and comments from the floor

9.25 - 9.35   **Disrupting online advertising of essay mills**
Miles Lockwood, Director of Complaints and Investigations, Advertising Standards Authority

9.35 - 10.25   **Strategies for prevention - supporting students, encouraging good academic practice and tailoring assessment design**
Anna McKie, Reporter, Times Higher Education
Daniel Dennehy, Chief Operations Officer, UK Essays
Dr Rachel Maxwell, Head of Learning and Teaching Development, University of Northampton
Dr Deborah Rafalin, Chair of Academic Misconduct, School of Arts and Social Sciences and
Learning Development Fellow, Learning Enhancement and Development Directorate, City, University of London
Questions and comments from the floor with **Miles Lockwood**, Director of Complaints and Investigations,
Advertising Standards Authority

10.25 - 11.05   **Detecting malpractice - active online searching, technology solutions and ensuring effective marking practices**
Professor Dominic Medway, Deputy Pro-Vice-Chancellor, Faculty of Business and Law,
Manchester Metropolitan University
Bill Loller, Vice President, Product Management, Turnitin
Professor Cath Ellis, Associate Dean (Education), University of New South Wales
Questions and comments from the floor

11.05 - 11.10   **Chair's closing remarks**
Lord Storey, Liberal Democrat Lords Spokesperson (Education)

11.10 - 11.35   Coffee

11.35 - 11.40   **Chair's opening remarks**
Gareth Crossman, Head of Policy and Public Affairs, QAA

11.40 - 11.50   **Lessons from abroad on developing effective legislation**
Dr Deirdre Stritch, Provider Approval and Monitoring Manager, QQI Awards, Quality and Qualifications Ireland

11.50 - 12.00   **Legislation as a strategy for prevention and other options to consider**
Professor Julia Buckingham, Vice-Chancellor and President, Brunel University London

12.00 - 12.35   **Legislative approaches to contract cheating - evaluating the efficacy of existing fraud legislation and navigating grey areas**
Professor Michael Draper, Professor, Hillary Rodham Clinton School of Law and Chair, University Regulations and
Student Cases Board, Swansea University
Kiran Chauhan, Chief Operating Officer and Co-Founder, Proofed
Robin Jacobs, Barrister, Sinclairslaw
Questions and comments from the floor with **Dr Deirdre Stritch**, Provider Approval and Monitoring Manager,
QQI Awards, Quality and Qualifications Ireland and **Professor Julia Buckingham**, Vice-Chancellor and President,
Brunel University London

12.35 - 12.55   **Priorities for restricting contract cheating - the role of a UK Centre for Academic Integrity**
Gareth Crossman, Head of Policy and Public Affairs, QAA
Questions and comments from the floor

12.55 - 13.00   **Chair's and Westminster Higher Education Forum closing remarks**
Gareth Crossman, Head of Policy and Public Affairs, QAA
Helen Crocker, Senior Researcher, Westminster Higher Education Forum

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Westminster Higher Education Forum closing remarks
Helen Crocker, Senior Researcher

Hello, good morning.

My name is Helen Crocker, I'm here from Westminster Higher Education Forum and I would like to welcome you to our seminar this morning on contract cheating.

The proceedings from today will be provided in a transcript, following up from the conference, so during the Q&A sessions myself and a colleague will come round with a microphone, so if you could please wait for us with the microphone before asking your questions, and also say your name and company clearly, that would be great, thank you.

I would also like to thank our sponsor for today, Turnitin, and thank them for their support with the seminar.

Can I ask you to turn off your mobile phones or on to silent please, and I will hand over to your Chair for the first session this morning, Lord Storey.

Session Chair's opening remarks
Lord Storey, Liberal Democrat Lords Spokesperson (Education)

Well good morning everybody, I've got 5 minutes of opening comments, it's good to see you all.

So when I came to Parliament as a primary headteacher of 24 years and a local politician, I didn't know anything contract cheating or essay mills and I happed to have an intern, she was doing her PhD, and she said to me I am just absolutely sick of the fact that essay mills are advertising on the university campus, they're handing out leaflets, they've got posters up etc. etc. And I said, essay mills, what are essay mills, and she explained to me, and as a result of that I put a series of written questions down in the House of Lords. I also wrote to QAA and they wrote back to me, I wrote to the Chief Executive, and they wrote back to me saying, well it's not really a problem, it's just a sort of marginal problem. But I persisted and I then met the Chief Executive of QAA, Douglas Blackstock and talked about it, and he, I have to say, he's not present but later on Gareth is from QAA, they were not taking it as serious as I thought they ought to be, let's put it like that.

I then also got contacted, because written questions were in the public domain, I got contacted by two whistle blowers from a particular institution in London, this happened to be a private institution, and the way it worked, one was from this private institution, one was from the validating university, and the way it worked was this. That the private institution paid agents £500 to sign up potential students from disadvantaged backgrounds. The agent got £500 for each student they signed up. The student themselves came off Jobseeker's Allowance and got paid a loan. The college itself obviously got money and the validating university got money. So it's a win-win situation for everybody, and in fact the Government were able to say, look at these disadvantaged pupils we've taken into our colleges and universities.

However, what happened was that at the end of the first year almost 70% of them dropped out, they'd got the money and went. The number that went on to do the degree courses, their exams, their work dropped significantly, the progression rate was alarming, I'm surprised nobody picked that up, whether from QAA or from the validating university.

So I was quite shocked by this.

Oh by the way, how it involves essay mills and contract cheating, when the would-be student said, well I can't write essays. Oh don't worry, somebody will write your essays for you, somebody will write your essays for you. Have you worked? No. Oh we can get somebody to write a letter saying we employed you. I was absolutely shocked by this that these two whistle blowers told me this, and I just didn't know what to do, I was absolutely stunned, I had no idea how to handle this, it was completely out of my particular remit. So I thought… I had a brainwave, I happened to know a former… a current person on BBC News, she worked at Radio Merseyside and I hadn't seen her for 20 years. I rang her, she was very interested, and she said to me the famous phrase, this is too big for us, so she gave it, as perhaps some of you might know, to Panorama and they did I think something like 4 months of undercover filming, and what they found was absolutely disgraceful.

Now things at that college, one college has been closed down, that college has reformed itself genuinely, I'm led to understand, I think they have, I need to go back and visit, but the whole problem of essay mills and contract cheating and degree fraud where you can buy your own degree as well, is just completely getting out of control. I have to say later on the Standards Agency are going to be speaking and they've done a sterling job, but in my view the only way that this can be changed, and we've been sponsored by a particular company who can hopefully find where particular phrases words, where cheating is going on, in my view we have to follow the example of New Zealand, and we have to bring legislation in to make contract cheating and essay mills illegal.

Enough from me, let's to turn to Miles our first speaker… sorry, no it's not Miles, I beg your pardon, it's going to be Dr Thomas Lancaster who is the Senior Teaching Fellow at Imperial College London, and sorry Thomas you're going to speak, I think, for 15 minutes and then take questions, is that alright?

Dr Thomas Lancaster: Well 10 minutes was what I was told, so we'll see how long I go.

Right you can do 10 minutes, you can do 9 minutes, but you're taking questions as well.

The underlying causes of academic cheating
Dr Thomas Lancaster, Senior Teaching Fellow (Student Support), Imperial College London

I will certainly take questions afterwards, and we have the whole morning for discussion …

So thank you Lord Storey for that great introduction and for all the work you've been doing to really raise awareness of what is quite a pervasive problem in our society. For me, this has a special interest, because it's an area that I've been working on since, well, 2006 when I published the first paper on contract cheating, or potentially before that if you look back to my PhD days, starting in 2000 looking at detecting plagiarism.

And I guess, we should start with a bit of a shared understanding of contract cheating. For me, I'm looking at the process where a student gets someone else to do their work for them. That's just a very loose definition, designed to cover a lot of different things, but we're thinking about students who are getting credit that they don't deserve.

And a lot of this work started off by my colleague, Robert Clarke, who is now retired but was part of our original paper, who enjoyed spending his evenings going online and hunting for assignments that had been posted by students looking for people to do them for them, incredibly publicly. I think he got up to 30,000 of them that he'd managed to trace by the time he'd retired, so massive numbers, and that was just the ones that were visible.

Now quite often, he would contact universities, and this would go into a black hole. He had no idea if they listened to him. I got an email once saying, is this person a crank, that was the type of response that was going around the sector, with people not really believing this was possible. But cheating is really nothing new, and we can look back 1,000 years to people finding ways to cheat in tests.

One examples that I'm really interested in is a cheating vest, on display in a museum in China, where answers or hints could be displayed inside the material. And contract cheating is not the only problem out there in terms of academic integrity. But of course, people were using other parties to write essays for them and complete assignments well before I started this research, but nowadays it's, let's say, a much less well-kept secret than then.

So why do students cheat? Ask and you will get a different answer depending which stakeholder you choose to talk to, it's a very well-studied area. Lots of student surveys, lots of people trying to find out about this, but really it comes down to people wanting to get an advantage they don't deserve over other students, an unfair advantage, because it could be a student who then uses the Degree that's been gained unlawfully to go and get a job, ahead of all the students we want to succeed.

I am an academic and I have a student support role. I believe in students doing well, I believe in helping them to help themselves and wanting the ones who put the effort in to succeed. I don't want the students who cheat to be the ones who get the advantage at the end.

Now if you speak to staff, you'll often get a response like, these students are just bad, they're lazy. Of course, the whole situation is much more complex than that. I don't think most students are inherently lazy or bad or misbehaved, I think it gets to a point where they end up finding they need to use a third party service or get a member of their family or a friend to help them out with their assessed work, regardless of academic discipline.

There is an incredible amount of manipulation going on through essay mills, contract cheating services, reported through the media. This was a story which ran just last week, which hasn't had a huge amount of attention nationally, about a student at Nottingham Trent talking about all these attractive young women who are friending him on Facebook, looking like they were other students from Nottingham Trent. And this happens everywhere, so I don't want to single out a particular university.

But once he'd added these young ladies to his friends list, he suddenly was getting information sent through messages saying that we're actually equipped to do your work for you, do you need help, we're an essay writing service. Or, an academic writing service, because essay mills tends to be a term that we use, it's not one that the services would describe themselves with.

And it's been picked up in a few other places since then but there are so many ways, Lord Storey, earlier, talked about the things he'd heard about ways essay mills were advertising. Whether it's going onto university campuses giving out business cards, getting into canteens, recruiting other students to promote the services. Incredibly pervasive, and a student can't avoid knowing about this. And the advertising is there because the market is there, and because the money is there.

Now I mentioned at the start about the work I'd done with Robert Clarke, where he contacted universities and things went into a black hole. That story I just mentioned had testimonials from three students with information that would allow them to be identified. And from the screenshots supplied by this particular essay service, I very easily worked out what university all three of those were from. I've tweeted them, I haven't gone as far as to contact them by email, but I haven't heard anything back.

This is something that happens at a wide variety of universities, the Russell Group and beyond, something that happens everywhere. But universities have a vested interest not to talk about this area. The QAA issued guidance on contract cheating a bit over a year ago with recommendations, I've heard very little news about what's happened from that guidance.

And indeed, the university I used to work at before Imperial, where I spent six months in charge of academic integrity and reviewed all their processes, I saw a news story from them recently where they were putting out the same quotes as before I started, saying, we don't have contract cheating we use Turnitin. Meaning, we use Turnitin to check for similarity. So it's a little understood problem, or it's one that people don't want to open a can of worms, because if they do, if a student doesn't succeed, then that's a black mark against the university in many ways.

One of the counter arguments given about contract cheating is that it's incredibly expensive. I've published two recent papers looking at this, looking at different sites students use, one of them an outsourcing site, a micro-outsourcing site, fiverr.com, one of them freelancer.com, which is where our very original research study dates back to. Fairly consistent price points across both those sites of about £20 for 1,000 words. So that is not expensive in terms of what students can afford.

And you can find people who are willing to work for far lower prices. Students can pay a lot more, they may or may not get a better quality of service out of that depending how smart they are. But there are workers, particularly internationally, who are able to supply work at, what to us seems like a very low rate, but which to them may seem quite appealing and seem like it's quite good money for that.

And I've actually got some more recent work, which I'm going to present at the Plagiarism Across Europe Conference next month in Lithuania, where it shows that the price has come down since that point there. So it is a race to the bottom type market, incredibly competitive because frankly, there are a lot of marketers who are saying, this is their route to make money. They can get information about essay writing services out there, people will buy, and they do.

In terms of student surveys, the single biggest reason that comes back as to why students cheat in different ways is, they say it's time. They haven't been able to get things done, they've got too many competing commitments, they've often left things to the last minute because they haven't quite worked out how to manage their time and to plan their own interim deadlines to meet an end goal. And that's something we need to think about in terms of how we educate and support students.

But for me, it much more comes down to pressure, and pressure can manifest itself in many different ways. It can be that pressure of time, but it can also be the pressure to succeed. The student has invested a lot of money in their course, or their family has invested a lot of money in this course, particularly the students outside the EU, where the fees for coming to study in the UK are much higher than in the UK.

And yet, we often get students who are coming in, and regardless of their quality of English and meeting our requirements, then it's very hard to say that someone who speaks English as a second language most of the time is going to be as strong as somebody who speaks English as the first language. Although, there are exceptions and there are many people who, from that background, who write far better than home students and understand many rules of grammar better than I do, so it's important not to generalise too much about students.

But the other pressure we hear about quite often, lots of great work, including my Cath Ellis who is speaking later, and colleagues in Australia, who have really done a huge amount of work on contract cheating in the last few years, it's to do with family pressures. The family is putting support into students, they need to see that they're succeeding, and we know that family pay for work. One of the major essay writing services a few years ago, released a story about how parents were buying their children essays for Christmas. It's the kind of thing that's talked about there, because if the parent fails it's a reflection on them and it's probably another year of fees that they've got to pay out.

And it comes down to a point in the student journey where the rewards of cheating and breaching academic integrity, far outweigh the risk inherent with this. And once that point has been reached, there's no going back. And in many cases, this particular risk can be the cost of failure. It's high financially, it's high in terms of time, the risk of being caught is low, so why not risk it, particularly if the worst thing that can happen to you is you're going to retake, which is what would happen anyway.

Many of the essay writing services promote themselves as providing support, beyond that offered at universities. They may say they're providing model solutions, and this may or may not be true, we have no firm evidence about this, apart from of course, we have seen lots of these essays handed in and assignments. But they use flyers all about support, billing themselves as the second university support service, sometimes even using university logos to make it look as if they are recommended by a university. It's a discussion we have to have with students about why those services are out there.

Students often lack the understanding about how to write and reference. That came out very strongly in work I did with Irene Glendinning across south east Europe. But we need to scaffold this support throughout the course, because if students don't feel they have that understanding then how are they going to get through their degree. If they have to breach academic integrity at the start, then they're not going to have the skills to succeed later on in their course there.

And a very recent publication with Alexander Amigud in Toronto that I was involved with, was looking at the reasons students gave requesting work on Twitter. And the single biggest reason that came out through that survey was they expressed frustration. Students didn't understand why they were being assessed, they didn't get engaged by the assessment, we weren't interesting them. And whether that's because of poor subject choices, or whether that's just because our variety of assessments doesn't engage them, or they don't feel prepared for them, is a wider question we have to answer when we look at our strategies for assessment in our institutions.

So I just want to conclude by suggesting, really, four areas that we can look at and try and solve, I call them the four As, for want of a catchier way to end this presentation. But really, the availability, why do students see these services and use them. The action, is there a real risk to students from cheating. The ability, are we preparing students and making sure they're ready to succeed in their courses. And finally, the appeal, can we make sure they're interested, we give them a variety of choices of assessments, if nothing else it means they can't just cheat one way, and we have much greater level of assurance that they are doing their own work.

There are so many more areas I could pick up on, because the sessions today all greatly interest me, but I shall leave that to the other speakers, and pass back to Lord Storey to take questions.

Thank you.

The underlying causes of academic cheating
Questions and comments from the floor

Lord Storey:	Thanks very much. We've got five minutes of questions, so can you indicate if you want to ask a question and who you are when you ask that question. Hands are shooting up. Yes, a question here.
Dr Robin Crockett:	From University of Northampton. A Reader and Data Analysis, but I'm also the Institutional Lead on Contract Cheating.
	And I'd just like to ask, what do you think universities should do about, for example, postgraduate students and members of staff who are providers of these assignments? I myself have received emails inviting me to sign up to write, which is a bit incredible when I'm all over our website as the lead on the problem.
Dr Thomas Lancaster:	Yes. As we know from all the marketing, whether it's aimed at students, or I have done a parallel piece of research looking at who the writers are, it's a scattergun approach. It's grab email addresses, it's try and get inside VLEs via access from another student, and then get contact information to spread messages throughout a university. And it's a, send it out and see what happens, type approach. There's no point sending a rude message back, it will just get deleted from that. I think it is a case of speaking to those individuals. I've had those kinds of adverts, as well, because they are scattergun. I know about a colleague I used to work with who told me they worked for one of these firms. It's the kind of thing that appeals to people who are on a zero hours contract, or they only work a few hours a week. Other examples of people being sucked in, not realising they're going to be providing essays. I have a PhD student, Corinne Hersey, working in Canada on this, and she became interested in this area because she ended up working for a firm, thinking she was just supplying short answers, and they ended up being answers to exam type questions taken online. So there are all kinds of ways people get sucked in, and techniques firms use to interest them in these areas. What should we do about it? We have these conversations with those individuals, we need to tell the PhD students, who a lot of this advertising is targeted at, that they're putting their PhD in jeopardy. They often don't think about bringing a university into disrepute. They're also putting the chance of getting an academic job in the future in jeopardy. And if they're having financial problems, they should look at other methods of support. I know it's incredibly tricky, because we want more and more out of students before they get to a point where they're earning money. But this is not a route, and it's about that ethical discussion.
Lord Storey:	Thank you. Next question. Anybody else. I'm not seeing any hands going up. Okay. I might just stare you out, like I do as a primary teacher until somebody cracks and puts their hand up. Oh, it's not working. Okay. Oh, yes, we've got somebody. Actuallys we'll take this as the last question.
Delegate:	I was just wondering whether you think other kinds of third party outsourcing services are disrupting this market, in a way that students find it hard to discern. So they find it hard to discern

between something, a service like Turnitin, a third party proof reading services, a professional proof reading service that might be offered to students with English as a second language, and perhaps something like Studiosity, or one of these other services that offer tutoring. Ethically, I think, but for students it's very hard to tell the difference, once these all appear to be services that they are purchasing.

Dr Thomas Lancaster: Yes, I think it's a great question. You've probably summed up a lot of what I would answer in your question. But one thing that comes up when I present in these sessions again and again is proof reading and editing, where do we draw the line. And for me, as soon as somebody changes a word for a student, that's going over the line. They can mark areas up for a student to look at. They can say, this sentence doesn't make sense. They can make suggestions. But they shouldn't make any changes. And we need to be able to ask students, what did your work look like before you went to this service, or before your friend or family member made the changes, and what did it look like afterwards, and for you to have an opportunity to declare that support on your work. I would like universities to have policies for this that they can discuss with students, to help them to differentiate between these different players in the market. I know a bit about Studiosity, there are other services like that which do have a code of ethics and they do say what they're willing to do for students and what they're not will to do, and they will declare their involvement to the universities they work with. Whether or not services working in partnership with universities is a perfect solution is open to discussion, but it can be a good way for them to supplement the support available inside universities. I quite appreciate, that those services can be stretched, particularly when a lot of students want help just before a deadline, as inherently happens. But yes, it is about having those discussions, saying we expect you to be engaged as a student electronically, we use services to help us with our online marking, to help us check for originality in the work, and to help us to find if you are accidentally not knowing how to reference and to cite. We expect you to use a certain number of services, but this is our code of practice within the institution.

Lord Storey: So could we show our appreciation to Thomas, please. Thank you.

So our next speaker, Miles Lockwood, is Director of Complaints at the Advertising Standards Agency. So do you want to go to the lectern.

Disrupting online advertising of essay mills
Miles Lockwood, Director of Complaints and Investigations, Advertising Standards Authority

So good morning everybody, essays as Christmas presents, I've heard it all now. If I got that I would be seriously disappointed.

Good morning everybody, it's lovely to be here. I'm Miles Lockwood, I'm a regulatory suit at the Advertising Standards Authority for my sins.

Now last year the ASA had, for the first time, some involvement in this issue with essay mills. I have to say I had never heard, I was blissfully ignorant with the whole concept of essay mills until we received some complaints about this subject and I'm pretty sure, when I was a student at Nottingham university 25 years ago these things didn't exist. Maybe they did but I was unaware… they did exist, goodness, well I'm glad I was never tempted into the dark sides of cheating back in the day.

It's quite a simple presentation really, I want to talk to you about what we found in the investigation of these issues. As I always do with these presentations though, I will just start with a very quick introduction about the ASA and who we are. So a bit of audience participation.

Who has a reasonably good understanding of the ASA, who we are and what we do, put your hands up? There you go, that's why I'm going to say a few words about the ASA to start with. We have a long way to go to explaining ourselves.

Well look we've been around since 1962, we were set up as a self-regulatory organisation to regulate non-broadcast media, all the traditional stuff that you would be aware of. In 2006 our remit was extended when Ofcom asked us to take on the regulation of broadcast advertising, and then more recently, in the area that I've worked at the ASA, in 2011 we extended our remit to cover advertising on the internet, so company's own websites and social media posts. And that's not very well understood that we actually regulate across digital media as well now, so I make that point this morning.

We don't cost the taxpayer a penny, we are paid for by a levy on advertisers, but people like me have no idea who pays into the system and who doesn't and that means I keep clean hands when I oversee the investigations that we carry out.

So we are kind of a bit of a hybrid with co-regulatory and self-regulatory functions, but recognised by the Courts. We're recognised by the Government in terms of our regulation of misleading advertising which is very relevant for the purposes of today. And our system, we are divided into two. There's an industry part of the system called CAP they write the rules, they are, if you like, representative of the advertising industry themselves, and then people like me, I wear the red hat, I am the part of the organisation which investigates complaints independent of the industry.

So if you advertise in the UK you need to make sure that you're as compliant with the UK Advertising Codes and they apply across all media.

Now misleadingness is the relevant issue for today and that constitutes about 70% of our work. When we investigate complaints about misleadingness though, we're not applying our own rules that we've made up. Our rules have to mirror the law, specifically the Consumer Protection from Unfair Trading Regulations 2008, which is a very complicated piece of EU legislation, which will continue to apply if we do leave the EU, as far as we know, and our rules therefore mirror the law, and if you're an advertiser, therefore, you have to in effect meet standards which are there in legislation, it's that serious.

Now I'm sure there's going to be some debate, well we've already had some debate today about the legitimacy and ethics of this essay mills as a business model. Now my understanding, I have my own views on

this, but my understanding is that they seek to perform a function by providing things like model answers and coaching, this is certainly the story that we heard from a number of these advertisers when we contacted them last year, and that is the basis on which they perform a legitimate activity, it's not illegal, as Lord Storey has pointed out this morning. And so it's not the ASA's role to pass judgement on the ethics of legitimate business practice, but companies selling these sorts of services do need to take care to not mislead consumers by overclaiming, by being unclear on the nature of the advertising that they put out there, and that's the point at which the ASA comes in, and this is particularly important because when you think about it, consumers and students are consumers, a lot of students are quite young, as we've heard this morning already from my colleague, students are under pressure, they're under, if you like, a sense of some vulnerability one might say because they are under pressures to perform in today's higher education environment with all the associated costs which weren't around 25 years ago when I was a student.

So we upheld three complaints in 2018 against companies who provide essay writing services for students. In all cases we told these companies to make immediate changes to their website claims. Now I've just summarised, I don't know if you can read that, I've summarised here some of the various problems that we found on these websites. In general terms some of the most important problems that we found here were that there were websites which were making claims that implied the essays could be handed in as a student's own work, claims that implied a student could order a guaranteed grade by using one of these services, and websites which failed to make sufficiently clear in their websites, and the overall presentation of the claims on their websites, the risks of submitting purchased essays as their own work. There are some associated problems as well, there was one website which, for instance, implied that essay writers were mainly Oxbridge educated, another which suggested that they were endorsed by lots of positive press coverage.

So I will take a quick look now at these three meanings in a little bit more detail. You're not going to be able to read that from where you are, but I understand you'll get a pack at the end with these presentation notes.

This first investigation concerned a company called Oxbridge Essays, and this website was found to be problematic because the overall impression given of this website, which built a suggestion that essays could be submitted as a student's own. For instance, the use of prominent language in the website, and I quote now, such as "*It has never been easier to get the grade you wanted. First Class, 2:1, no problem. We make sure you get the grades you want. Download your work, sign in to download your custom essay or dissertation, 100% plagiarism free".* Now all of that, in our view, built up a sense that the work could be presented as a student's own, and that was misleading because we know it cannot.

Now meanwhile, importantly, the advertiser here is telling us, "*but look, we've got warnings in frequently asked questions, fair use policy, it's all on the website or you can go and find it. Consumers, these students, they should be fully aware that these warning signs are there."* Now our view of that was whilst, yes we didn't dispute that these warning signs existed, they were insufficiently clear within the website, and it is a broader question as to whether or not, in all of the work we do, qualification is important, qualification needs to be sufficiently prominent, and we all see this in the ads that we see, the small print and so on, and we do have an on-going battle with issues of prominence, but it's also important that qualifications don't contradict the main claim as well.

The second example.. All Answers Limited, trading as UK Essay, similar problems, and this was actually a complaint that the QAA were the instigator of, again claims on the website overall, misleading impression, for instance, and I quote again "*Guaranteed grade every time, we guarantee the final grade of the work. We were the first company in the world to offer you guaranteed First and 2:1 work, we so firmly believe in getting you the grade you order"* were problematic again because in our view the overall impression which was built up when you were engaging, as a consumer, with this website was that this work could be presented as your own and guarantee you a grade. Again similar issues, similar arguments from the advertiser that there was a fair use policy, but in our view that fair use policy was insufficiently prominent and a consumer, in fact this is the same with the other case as well, in the context of the consumer purchase journey, you could go through the entire purchase journey on this website without ever encountering a warning claim, and that was a problem, because if you bury stuff away it's not going to be good enough for our purposes.

And then the last example, again had similar problems, Thought Bridge Consulting. The website included claims such as, "*get the grade you ordered, get the grade you need and achieve more today, plagiarism free.*" And again, on separate pages there were warnings about cheating and how that would be problematic, again it wasn't sufficiently clear.

So in summary the complaints that we saw were upheld because they gave an overall impression of the work, that the work could be submitted as their own. The meaning of the claims wasn't always sufficiently clear in the ads and they weren't sufficiently qualified, and warning messages were buried away with no attempt to draw attention to them in the purchase journey. And so on those bases the ads misled against our codes and against the relevant EU legislation which will be applied.

The rulings generated quite a bit of press coverage, press coverage is a deliberate purpose of our rulings, one of the most important part of our role as the ASA is to increase awareness, increase student awareness in this case, so we were pleased to see the press picked up on this in quite a big way and that served a purpose in raising, you know, surfacing this issue a little bit more.

In general terms about our compliance, most companies comply with us, but we do have a range of escalating sanctions for those companies who do not play by the rules. Ultimately, although we are an organisation which doesn't have fining sanctions, or statutory sanctions ourselves, we work in collaboration with Trading Standards, and we have a backstop and we are able to hand over particularly recalcitrant advertisers to Trading Standards who can take civil action through the Courts and fine them, and they do do that, we do do that where necessary. So there are teeth to our rulings.

This probably isn't that relevant today for people in the room, I don't know how many essay mill companies are here, but we do have further resources; there is help that these companies can get to get their claims right, it's free, it's delivered by our sister body, CAP. We do try to work with advertisers where possible and I would urge essay mill companies to get in touch with CAP to make sure that their website and other kind of claims are correct and not misleading.

And my final statement really, final thoughts As I said, university students are under increasing pressure, they're generally younger, they're more vulnerable to a siren call suggesting that it's an easy way out from hard work and graft, to purchase one of these essays and submit it as their own, and so essay writing services really do need to practice what they teach and play by the advertising rules by being accurate, by being cautious, and by making sure that their advertising claims are clear.

That's all from me, thank you very much.

Miles Lockwood's slides can be downloaded from the following link:
https://www.westminsterforumprojects.co.uk/forums/slides/Miles_Lockwood2.pdf

Lord Storey:	Thank you. So I think Miles is going to join us on the panel, and we've got four speakers who are going to speak briefly then join the panel, and then it's over to you. Now be thinking of some questions, I don't want to see a sea of folded arms and no response, maybe you're just overwhelmed, or underwhelmed. So Anna a Reporter from… oh there you are, sorry, from Times Higher Education. Hi, you've done a quite a bit of work in this, she's contacted me… do you want to go and speak there and then when you've said a few words come and sit here.
Anna McKie:	And then come and sit down, yes.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Strategies for prevention - supporting students, encouraging good academic practice and tailoring assessment design
Anna McKie, Reporter, Times Higher Education

Can you hear me? Oh, great, thanks.

Good morning, everyone. Thank you so much for the invitation to speak here today on such an important issue. Although, I'm not an academic myself, I have, as Lord Storey says, written extensively on the subject for THE, and spoken many times with the great experts in this area, quite a few of whom I believe are in the room, just because I believe it's such an important subject. And I'm sure I don't need to explain why paying someone else to write your work is wrong, and how doing so will leave students without the education they arrived at the university for.

So yes, thinking about strategies for prevention and how to support students in understanding good academic practice is really an integral part of tackling this issue. So for one of my stories to try and gather some information about prevention, I ran a fairly informal survey gathering academic thoughts earlier this year. It's definitely not as extensive academic rigour as I'm sure many of you are used to, but the results were quite interesting, so I thought I'd share some of the findings.

So I had 230 responses, and so 46% of those respondents said that contact, these were all academics, by the way, that contract cheating was a small but significant problem, 23% felt it was a widespread problem, 17% said they didn't know and only 13% said it was a rare occurrence.   So I get the sense from the academics that I'm speaking to, not just the researchers in it but just in general, that this is a pervasive problem.

And a huge 70% of the respondents said that they had suspected one of their students of using contract cheating services. Only 37% said a student of theirs had been proven to have done so. But I think that kind of, proves what we know about how difficult and time consuming it can be to detect and prove this kind of cheating. And I think another session is going to have a look at how we can tackle that.

84% of the survey respondents said they believed contract cheating should be criminalised. This is an increasingly shared view across the sector, particularly in the UK, after countries such as New Zealand and Ireland and I think recently Australia, have taken steps to make them illegal. One interesting one, when we were talking about prevention in the survey was, an interesting finding was that a significant minority, which was 41%, believed that students should be criminalised for using such services, and I found that fairly surprising.

Looking at the comments on that question, one Australian respondent who said that yes, they believed that students should be criminalised, was because the scale of contract cheating is so vast, and any solution that doesn't place the onus back on students as well as contractors is doomed to failure. My survey followed a recent paper from Phil Newton and Rebecca Awdry, which analysed… had their own survey, and they also found that there was a modest qualified support for the criminalising of students who use these services.

But is that the right thing to do? Many would argue that criminalising is not the answer, and I would say that I'm inclined to agree. Speaking to… following my survey, I spoke to quite a few academics, and many have researched the issue, and they pointed out that we should be seriously opposed to legislation that would result in students having a criminal record. And one said, this is because it is the job of teachers and universities to educate students and help them get back on track if they stray. Although, many also said they should not be afraid to suspend or expel students, as long as we can show that they were aware of what the consequences could be.

And I think this is quite kind of, the crux of the argument about how you prevent students from cheating, because universities are supposed to be the place where learning happens, particularly when they are filled with, as has been mentioned before, young students on the cusp of adulthood. And criminalising them would fail to take into account the reasons why they cheated in the first place, which Thomas Lancaster has… gave a

great talk just now on that. Were they let onto a course that was too difficult? Why does that happen? What are the pressures students today face? Has the institution made it clear enough about the ethics and academic consequences of paying someone else to do your work?

I mean, for example, when I was at university, I knew of someone who wrote to the campus weed suppliers essays for him in the final year in exchange for free product. And most people, while not condoning it, simply laughed it off. Although, this was in large part because of the poor quality of work they produced, having smoked all their payment first. But I thought I showed that we all just thought it was funny, and it showed that people didn't quite understand how unethical it was, that you were handing in work that wasn't your own.

So I believe it's really important to counter those adverts, who seem, you know, pervasive on universities, they get them on the back of toilet doors, on social media, with universities explaining how wrong it actually is. And also how severe the consequences for getting caught are, although, kind of, as I said before, perhaps not quite as far as criminalising them. And at the same time, universities should be looking at the wider reasons why people might pay someone else to do their work, if you tackle that you will, kind of, prevent the problem.

Just a, like, final note, and I know the panel… the title of this panel also includes tailoring assessment design, which I think is a really interesting issue and actually features in an article that will be published on the THE tomorrow, written by me, just to plug my own work. And I spoke quite extensively to Cath Ellis, who is here today about it.

And it shows that kind of, what I found was, evidence shows it is almost impossible to design it out. Students find ways to cheat, they always will, as Thomas pointed out, they've been doing it for centuries. But it is possible to offer other forms of assessment, such as authentic assessments, or adding layers to the process of essay writing which can help. And I think that you know, although it might be impossible to remove contract cheating indefinitely, it's important to think about how we engage students with assessments.

Although, of course, once again, we get into how much time and resources academics have available to do this, which I think is probably another thing we need to look at is, we need to give academics the ability to find it and to prevent it, and in today's higher education world I know that is particularly difficult.

So thank you.

Lord Storey:	Thanks very much Anna. So where's Daniel? Daniel? Oh, right, so Chief Operating Officer for UK Essays. Daniel.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Strategies for prevention - supporting students, encouraging good academic practice and tailoring assessment design
Daniel Dennehy, Chief Operations Officer, UK Essays

Good morning, everyone.

Let me begin by acknowledging the elephant in the room and yes, I do work for an essay writing company. So why am I here? I'm not here asking what we would like to do as an essay writing company, but rather, what would you like. Whether we like it or not, we are both in this situation together, at opposite sides of the table, I appreciate, but it's imperative we know what it is that you seek. I think the answer will be using, less plagiarism and a bigger emphasis on academic integrity.

We've all seen the recent press reports indicating a figure of one in seven students are using a model answer. But how relevant and true is that figure to the UK? A Channel 4 fact check, via a freedom of information request, found a very rough estimate of 915 students were found guilty out of the 2.3 million students last year, a percentage of 0.04.

If we look at Professor Newton's 2018 paper, which generated the one in seven students are using an essay writing company, the British student inclusion of that paper was around 5% of the 54,000 students who participated. And crucially, there were no British students included in vital post 2014 samples, which generated the 1 in 7 figure. Prior to 2014, it was an average of 3.5% worldwide, only post-2014 did it jump up.

The report was also based on 54,000 students worldwide over a 40 year sample. When considering that there are approximately 200 million students worldwide each year, it would suggest to me that the findings were insignificant, especially within the UK, when only 5% of the total participants were students from the UK. If you're interested about further information and findings related to Professor Newton's paper, that myself and others have found, I would be happy to share the information with any interested party before its impending release.

But it's certainly not a one in seven problem here in the UK. Africa maybe, but that's not what we're here talking about today. I do want to be clear, though, right now by saying, I'm not standing here and saying to you that contract cheating is not an issue, as any form of academic misconduct is an issue and academic integrity should be held in high regards. But I do believe that understanding the problem in full is crucial to any solution.

Then how do we achieve our goal of less plagiarism? Let's ban the industry in the UK, this seems straightforward but now with the internet it's certainly impossible to enforce. We can't ban foreign companies and we can't ban people on vast social media channels as lone rangers working under aliases. So you'll just push the customer into the hands of these rogue operators who are far beyond your reach.

Other legitimate companies could simply move abroad and be further out of your control, others would just hide their location. Prohibition has never worked, and only pushes any behaviour further underground and out of the influence of those that seek to control it, and into the hands of those who don't share your morals or objectives.

Prohibition is proven to be an excellent way to work against your own objectives. As much as I or anyone doesn't like it, this truth remains, people will do as they wish, they will take the risks, legal or not. Therefore, if you seek to push this issue further out of your control, have less influence and less input, and worsen the plagiarism problem, like we actually said it would in 2003 with this approach, then it's easy, just carry on with the same approach.

If, however, you wish to bring usage more under your control, shape it, have an input and help to safeguard education and academic integrity, the only way, in my opinion, is to regulate the industry. Plagiarism is a problem that will remain, because students want outside help, for which there are many reasons for, which

have also been touched on already today. Prohibition does not alter basic human demand but regulation allows you to shape that demand.

All we can do is try and give those that require help a safe, regulated way to use a model answer. And for this, we have always offered ourselves, and again we will once more, as we have done since 2003, to be part of. If we can come to an understanding where a handful of operators are highlighted as legitimate, regulated by universities who, in turn, don't encourage our use but do not deter it, we can certainly come to an agreement where all future work is submitted to universities, to ensure it is used correctly.

Finally, I come to what's important to us as a company, All Answers, UK Essays. Being a business and helping more honest students and less dishonest ones. You may not like us, but this plan requires balance, give and take from both sides, and is the only solution that will help achieve the goals.

Thank you for your time today.

Thank you.

Lord Storey: Where is Dr Rachel Maxwell? Oh, there. So Head of Learning and Teaching Development at the University of Northampton.

Strategies for prevention - supporting students, encouraging good academic practice and tailoring assessment design
Dr Rachel Maxwell, Head of Learning and Teaching Development, University of Northampton

Okay. Thank you.

I'm assuming this is going to work for me. Yes, excellent.

Instead of having the academic go through students' work to teach them not just about plagiarism but about referencing, substantiating claims, developing your voice, showing how your work connects to prior work, which is hard to do, universities say 'the reason we reference is not to plagiarise and we can use a bit of software to handle that'

(**Sioux McKenna, director of postgraduate education at South Africa's Rhodes University (THE, 11 March 2019)** Source: McKie, A (2019) £1.3 billion Turnitin sale spotlights intellectual property fears. *Times Higher Education [online]*.

Okay. I'd just like to start with this quote, it's from another one of Anna's articles, earlier this year. But it's basically saying, you know, instead of actually teaching our students about referencing, about substantiating their claims, and about developing their voice, we seek to use this technology - we have Turnitin, we've got this bit of software to handle that.

What I'd like to do today is say that although we have Turnitin at Northampton, and we're looking at the Authorship Investigate tool, we're also working hard to address some of the other things above, and that's really what I want to focus on today.

So what is our approach? Primarily, we're looking at a 'prevention is better than cure' approach. So we're looking at what we can do from the outset to educate our students about academic integrity. I don't know what it's like at your institution, but I find that we put a lot of things into policy and then we think it's dealt with but it doesn't actually hit the students at the end of the line, you know, they don't really understand what it means on a day to day basis, in terms of their academic practice.

So I want to look at three things today, one of which is our 'speed awareness' UNPAC course, which stands for the University of Northampton Plagiarism Avoidance Course. We've got an AIMS course that uses Team-Based Learning to explore with students what we do mean by academic integrity, what we mean by misconduct, and some of the policy changes that we've introduced in order to help address these different challenges.

Oh, let's go back one.

So let's start with UNPAC. Yes, I said it was a speed awareness course, you know, when you get caught for speeding - I've never been done, but, you know if you get caught you can go on a speed awareness course to avoid the fine. And we wanted to introduce something that said' okay, if you've been found guilty of misconduct, then how do we educate you, how do we stop you being in this position again?'

And that's where we started from. We then realised that having designed this resource, we could use it much more broadly across the institution to help our students understand what we mean by misconduct, what we mean by integrity, and how to avoid being in that position. But also to explain what happens if you are referred for misconduct.

So we have three different units as part of that course, one of which is focusing on what academic integrity is, what it means to the institution and what it means for you in terms of developing your voice. The second unit focuses on how you avoid misconduct, and the third one on what happens, as I said, if you are referred.).Each

of the different units has a series of different resources, so we've got videos with associated transcripts, there's explanations, there's examples.

And at the end, there's this short mandatory quiz that allows us to generate a certificate for students to show that they have engaged with the course. We have some student feedback here, which I thought was just really nice to see that they found that the resource itself was particularly engaging, and it was helping them to understand their own understanding, so that was a nice bit of feedback that we got from that. The second thing to talk about is AIMS, so AIMS stands for Academic Integrity and Misconduct for Students –

all of the units [were] really attention grabbing … the quizzes at the end were especially useful to check my understanding … the videos … were motivating (Anonymous student feedback on UNPAC.

Source: https://www.northampton.ac.uk/ilt/academic-development/academic-integrity/ [Accessed 10 May 2019])

it's kind of what it says on the tin! It uses a team-based learning approach, I don't know if anybody knows or uses team-based learning in their academic practice. This slide here is our adapted version of TBL that we use for AIMS. We realised that we didn't need to do the full process in an hour slot with students in class.

But what it allows us to do is use something like UNPAC to help students engage with the policy. We don't need to read out the policy, I mean, I can't think of anything more tedious for our students than reading out the policy requirements but rather to get them to engage with it. We then bring our students into class and we used to do the individual test, but now we just do a team test using scratch cards, which is particularly good way of getting our students interacting and talking with each other about the types of issues that are involved in this area.

Anything that comes up and needs clarifying we do, and then we move on. And the key thing really for our students is that notion of applying what they've just learned. AIMS forces them to consider things like 'So what does academic integrity mean?' 'What does the policy mean?' 'What does it mean by academic misconduct?' 'What happens when a student, you know, one of your friends says to you, can I have a look at your work? Do we want to work together on this?' and you're like' what do I do?'

So let's have a little look at the content. I'm not going to go through all the detail of it, but the test itself is based on questions or scenarios that our Academic Integrity Officers identified as being issues of concern, whether that is paraphrasing, or self-plagiarism, or referencing, or whatever. What do you mean by 'common knowledge'? You know, that was one that seemed to particularly come up. Or, how do you reference Wikis and Blogs and internet sources, you know, are they just ideas that you can adapt?

So we go through those core scenarios, and as they're completing the multiple choice quiz, they have an opportunity to discuss amongst themselves why something is misconduct or, importantly, why it isn't. So there's a lot of discussion that goes on within the groups, which means that tutors are not having to just talk at their students all the time.

And then we go on to the application scenarios. We give our students a source, the original source, and alongside it a dummy example of what a student might have done, and we say 'okay, is this plagiarism - yes/no?', and if it is, what type of plagiarism is it? And we've got some contract cheating examples in there to pick up on that particular challenge.

But the scenarios are really about saying to our students 'okay, these are the types of things that you might, might find yourself facing. You might have colleagues who say to you, can I look at your work. You might be tempted you might find that card on the toilet door that says 'come and speak to us about proof reading'. Is this acceptable? Is it not? Are you likely to fall foul of the policy and be referred for misconduct?'

And then the last area I really want to talk about is policy changes. So we've tried to have quite a holistic approach, I think, to making sure that we've got a full suite of mechanisms for addressing students who find

themselves having committed misconduct, particularly around contract cheating. One of the things we've done is introduce an academic viva, so that the tutor can have a conversation with the student before they refer, that says 'okay, can you show me your drafts? Can you talk to me knowledgeably about this work that you have just submitted?'

This is important because we can't get access to things like the receipt for the work from the essay mill, or we can't access the email chain between the student and the supplier, because it's all hidden, it's all aliases and everything else. But can the student talk to the tutor about the work? We can then use that as a basis for making a referral to give us some more evidence as an indication of whether or not to proceed.

We've also looked at closing a number of loopholes within our policy, and also making sure that those polices interact effectively with each other. So now we can refer from the Academic Integrity and Misconduct policy to the Student Code of Conduct, or to disciplinary panels, depending on how severe the actual case is in hand.

For example, where we've got ghost writers who aren't even submitting the work themselves, they might still be students at our university, they might have done that same module last year - how do you deal with that? The student hasn't submitted it themselves for academic credit, but we know that they're involved.

One things we will be introducing this year, is this notion of a final written warning, as well, that says 'okay, you have been involved in this, it's maybe not your work, you've maybe not submitted it yourself' but instead of having to cross refer to another panel, another policy, another delay, and everything else, to bring that back in so it can be dealt with as part of the normal misconduct processes. It allows us to bring things like ghost writing back under the Academic Integrity and Misconduct policy, so that we can deal with it there.

So that's broadly the three areas that I wanted to focus on. Yes, thanks, that's me.

Rachel Maxwell's slides can be downloaded from the following link:
https://www.westminsterforumprojects.co.uk/forums/slides/Rachel_Maxwell.pdf

Lord Storey: Thank you very much. Thank you Deborah, you're Chair of University of London, quite a long list of things, so…

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Strategies for prevention - supporting students, encouraging good academic practice and tailoring assessment design
Dr Deborah Rafalin, Chair of Academic Misconduct, School of Arts and Social Sciences and Learning Development Fellow, Learning Enhancement and Development Directorate, City, University of London

Let me just check it's all working. Oh there we go.

Okay, so hi everybody.

As Chair of Academic Misconduct and a Learning Development Fellow who focuses on assessment and feedback, I have gained some what I think are valuable insights into the complex relationship between academic integrity, academic misconduct and assessment strategy and design, and as has been noted today the causes of contract cheating are many faceted and they require a holistic multi-dimensional approach to address them. So alongside support for student academic skill development and the deterrent of a robustly implemented academic integrity policy, preventative strategies in the form of innovative assessment may help reduce the need and opportunity for contract cheating amongst students. So today I am going to briefly suggest three strands of assessment strategy worth considering.

So firstly, assessment strategy needs to consider institutional issues outside of the students' control which may be contributing to the decision to cheat. For example, students may be accepted onto a course of study for many reasons, but this may be beyond the current level of their individual capabilities. As Thomas mentioned earlier, then the institution must ensure that assessment strategy bears this in mind, enabling students to work towards attaining expected levels through a programme of gradual assessment and developmental feedback. Likewise, institutions have a responsibility to consider how the frequency, volume and timing of assessment might influence cheating behaviours, ensuring that students have got the space and time to produce good quality authentic work. Students may be more likely to seek short cuts, in my experience, such as contract cheating practices if they're struggling to manage multiple assessments simultaneously.

Additionally, as was mentioned, institutions should ensure that workload pressures don't prevent academic staff from committing adequate time to refreshing assessment each term. Poor practice, such as rolling over questions or repeatedly re-using assessment questions or using assessment questions that are very closely linked to set textbooks, can contribute to contract cheating because such model answers are readily and cheaply available for purchase.

The second strand I want to mention focuses on assessment strategy developing authentic work. International academic integrity literature has long argued for original, individualised, sequential and personalised assessment design. Essays and reports are straightforward and cost effective to purchase from contract cheating providers. And although other forms of assessment are not immune to this, tasks that ask for student opinion, personal experience and reflection are more likely to be authentic.

Assessment strategy should require a student to be able to evidence and apply their learning in a range of ways thus increasing authenticity. Using multiple diverse assessment methods, including some physical presentation, will make it more difficult for students to contract out all their work and thus increase potential learning engagement. And as was mentioned earlier, we can assess the process of learning in an integrated way within our modules, for example, we could require students to provide evidence of their work in progress as a standard practice, such as presenting drafts, reference material or planning documentation, either at staged submission points or along with the summative assessment, and in fact a percentage of a final mark can be allocated for this evidenced process, again potentially making contract cheating much more difficult.

The third strand of assessment strategy that I wanted to suggest is really focusing on developing the transferable learning that will serve a student's development beyond university. Cheating doesn't happen in a vacuum but I would argue that it could be seen as an inevitable outcome of the message that education is

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

primarily about quantifiable, measurable outcomes. Many students have internalised the message, as a result of school and everything else, that the products of education are simply the marks they receive on an assessment. If we want to make students understand that cheating makes no sense, which it doesn't from an educational point of view, then we have to convey the message that their own learning and development as an academic individual is the real desired outcome of education. And whilst by no means having the power to achieve this shift alone, assessment strategy can play an important part in this.

Programmatic assessment advocates tasks that reflect a more holistic understanding of competency than is typically found at a module level taking an applied and integrated approach, and this places greater emphasis on assessment 'for' learning rather than simply 'of' learning. It would incorporate formative 'low-stakes' tasks as opportunities for providing feedback and development, rather than just focusing on 'high-stakes' final marks and furthermore, as these assessments would integrate knowledge and skills from across modules, they're much more difficult to outsource.

So in conclusion, innovative assessment strategies can develop the framework of values within which students learning must be embedded, however it can't eradicate contract cheating. Nonetheless, it plays an important role in embedding those values, can encourage students to engage in authentic work and it can reduce the desire and opportunity to cheat thus enabling students to develop the transferable learning that will serve them well beyond university.

Please follow this link and click 'Good Assessment Design' to download *Designing Assessment to Minimise the Possibility of Contract Cheating.*

Thank you very much.

Dr Deborah Rafalin's slides can be downloaded from the following link:
https://www.westminsterforumprojects.co.uk/forums/slides/Deborah_Rafalin.pdf

Strategies for prevention - supporting students, encouraging good academic practice and tailoring assessment design
Questions and comments from the floor with Miles Lockwood, Director of Complaints and Investigations, Advertising Standards Authority

Lord Storey:

So we have 20 minutes for observations, discussions, questions, thoughts on what we have so far heard. Who would like to kick off first? Yes, and the microphone will come to you.

Dr Alan McKenna:

University of Kent.
I want to pick up on a point that Daniel mentioned and I want to ask Miles about this, the jurisdictional issue. So Daniel was mentioning effectively that if we push out the UK based essay mill companies, they're going to go abroad. Well I think they're already abroad, so do you have power to deal with those type of organisations?

Can I also ask Rachel a question, what is the current position of your work? Are you seeing actually positive results in respect to the awareness of students in terms of academic discipline, are you seeing a reduction in cases?

Lord Storey:

Let's go with Daniel first then… No sorry it was Miles.

Miles Lockwood:

I knew somebody was going to ask me that question. It is complicated but the simple answer is, yes probably, but it depends where the advertising is coming from. Stating this another way, I mean our starting point is that just because an advertiser is overseas doesn't mean that we can't do anything about it. If they are marketing to a UK audience, then we will always try to take action wherever we can. Where it gets a little bit more complicated is in terms of enforcement and in the context of Europe, across Europe there are many, many similar organisations just like the ASA and we operate within the network, and we can do two things normally, we can either refer a complaint over to our partner body who will take action themselves, or in some circumstances we might ask them to take some sort of enforcement action on our behalf. It gets much more difficult where the advertising, particularly if it's on a website is coming from a part of the world where there isn't an effective partner, self-regulatory or co-regulatory organisation. Again it also depends on the nature of the media, the most difficult thing to manage when its overseas are website claims, when it's on a company's own website, but where we are seeing advertising from a body overseas which is, for instance, on a paid for advert on Google for instance, we do have very effective systems in place with Google and they will take down adverts if necessary. The other things we can do in these sorts of situations, particularly in the digital space, is another piece of co-operation that we had in place with Google is that where we are seeing really problematic claims from an overseas website, we can place our own advertisement, the ASA could place its own advertisement which ranks up against the advert, the website claim which is being put out. So that helps to suppress some of the problems.

Lord Storey: And Rachel?

Dr Rachel Maxwell: Yes I'd love to put my hand up and say I can prove that to you and give you the data, it's, I'm sure as you know, an awful lot more complicated than that. What we're finding is the anecdotal feedback from staff is that they are having much more in-depth conversations with students about what we mean by academic integrity, why it's important, why we need to do something about it. What we can't currently do is chase that through, you know, for these students who attended and did AIMS, you know they have never been referred at the moment we just don't have the capacity to record that. But I think that having that preventative approach has been beneficial, we have, you know, seen a lot more awareness around it, you know, whether that's through working alongside students union around other things or, you know, getting them involved in the international day of cheating and things, or against contract cheating let's get that right, you know, so yes I'd love to say yes I think it probably is but I think it's probably too soon to tell as well, yes it's not a very scientific answer is it.

Lord Storey: Thank you, question here and then a question at the back.

Professor Michael Draper: Swansea University.
I've got a question for Miles but first of all just an observation. I know that Professor Newton isn't in the room, who is a colleague of mine at Swansea University and I would just like to make the observation, he might have presented the results in a different way and certainly the 1 in 7 claim doesn't come from Phil, and I think he would also say that students generally don't actually put their hands up in surveys and admit to academic misconduct. And so he would point to the canary in the mine really that the proliferation of sites sabotaging these services perhaps indicates that there is an issue, albeit the figures… well we can debate those.

For Miles I noticed the points you were making about the tenor advertising on the various sites that you looked at over the last year, and there was a balancing exercise between yes there were basically phased policies and disclaimers, which seemed to be hidden and basically outweigh the tenor of the claims being made. I suppose my question is then is, would these disclaimers and phased policies actually work if they're giving a higher profile on the site? So if a student, when they click purchase as warning came up three times, you can't use this as your own etc, would there be any difference in your approach?

Miles Lockwood: Yes I mean our expectation was that the warning for fair use policies needs to be much clearer in the purchase journey and much more prominent on the website and it always depends, The difficulty we have is that each piece of advertising is unique and you do find yourself very quickly having to make an assessment of the overall tone and content of each individual website that you're looking at. But the rulings that we issued last year did, if you like, set a stake in the ground for these sorts of companies, which is that if they are making claims they need to not give out an impression that it's okay to submit this stuff as your own, they need to work much harder at

explaining the point that I was trying to make earlier on, which is my understanding about the legitimate part of this practice which is that it's all about coaching and, you know, part of the tutoring process. So websites, if they are going to avoid falling into problems, need to be really playing on that sort of message a lot more, and to belt and brace it, we said you need to be putting fair use policies and warning messages much more plainly in the architecture of your marketing communications to be on the safe side.

Lord Storey: Daniel did you want to make a comment?

Daniel Dennehy: Just in respect to Professor Newton's paper, I know what you're saying terms of he didn't identify it as 1 in 7, he did identify as 15.7%. But what I do agree with that it is a problem whether it's 1 in 3 or 1 in 7, there are issues with academic integrity, hence the reason why I'm happy to sit here today and talk about it very openly, within the company I work for, we have very high morals and ethics, we turn customers away all the time, and again it's just another strategy but we have to try and prevent mis-usage of the work itself, but unfortunately there's a lot of companies that don't do that, we've talked about social media where you have a lot of aliases popping up, if you just write into Twitter, struggling with my essay, within seconds you've got 5 to 10 random aliases from around the world offering to help by direct messaging. You can't control that, it's very difficult to take control of that. What we can look at is regulation within the UK, and Miles mentioned, and very rightly sir, yourself, brought up about international companies, we're seeing it already, there's a competitor that advertise very heavily in the UK but are based in the Ukraine. Now they were very heavily mentioned within the press, maybe a year or so ago, for advertising on YouTube, now YouTube took action on this, but the scale of their site went from visibility within Google of a rating of 10 to 100. So what's happened there is we're just pushing more students towards them making them aware of that mis-practice and the ability to cheat and hand the work in.

Lord Storey: Thank you, person at the back there?

Gareth Crossman: QAA.
It's for Daniel really. You talk about regulation but haven't really provided much detail of that. Wouldn't criminalisation provide the necessary regulation?

Lord Storey: Who would like to pick that up?

Daniel Dennehy: Sorry can you say that again, I couldn't quite hear it, sorry.

Gareth Crossman: You speak about regulation, but you didn't really provide any detail of what that meant. Wouldn't criminalisation of essay mills provide the necessary regulation?

Daniel Dennehy: Regulation, so we work in hand with the universities where universities would be able to receive the work that essay writing services produce for their students. We're not saying recommend us to students, what we're saying is don't defer it, done deter them from using our services, but if they do use our services then we'll

work with that university to submit that paper to the university so they're fully aware what paper that student has received.

Lord Storey: Okay person here?

Delegate: [Transcript gap] with our distance learning students so slightly different than others in the room perhaps.

My question is to the whole panel, do you think we, as educators, have a responsibility to start looking at our marketing as part of academic integrity? Perhaps things have changed massively since the 20 years ago that I was applying for university, but certainly then the emphasis was on do this degree, it will get you a better job which will get you more money. In that context it's perhaps not surprising that students are trying to buy essays because throughout their entire school journey they have been prepared for university, they're told that once they get that degree they will get a better job and get more money, you know spending the odd couple of hundred pounds or twenty pounds here or there to help that seems like a reasonable investment in their future. They then come to university and are met with this alien concept of academic integrity, you're here because you're learning journey is valuable, we want you to fail, we want you to learn, and that seems to be quite at odds with what we've advertised so far. So I just wonder if our advertising needs to be looked at in the context of academic integrity?

Lord Storey: Anna.

Anna McKie: Yes I'd definitely agree with that, and certainly what you're talking about 20 years ago I think it's probably more the case now, people see education as more of a commodity especially when, you know, UK students paying £9,000 fees but overseas students are paying even more. And yes I think it would be right to make sure that students understand that the point of getting a degree is not just the job you get at the end, and that obviously sometimes we kind of get mixed messages about that, about oh how much, information about how much students earn if they do this degree definitely conflicts with coming to the university and then suddenly saying, oh but like you know don't cheat and it's about ethics. So yes I think advertising what university is from, not just the universities themselves but from everybody who's involved in getting students to university. The Government certainly is part of that, and the media could probably help to explain that it's not just about get the right A Levels, get the right degree and how can you become a useful member of society. I mean I certainly think that crops up in so many different ways more than just contract cheating, I see it all the time and academics are always telling me about this, and it is certainly something that the sector, as a whole, not just universities themselves, but all the players in that, I think, and yes that would make a huge difference in whether or not students want to cheat.

Lord Storey: Deborah?

Dr Deborah Rafalin: Yes, I would agree, I think this is a much bigger issue than just contract cheating, and it predates higher education. I think this goes

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

back to a much bigger contextual situation in terms of education, full stop, and the political climate that our young people are in. Students are scared, people are scared about their futures, people are uncertain about what's going to happen to them next, whether or not they're going to have the money, the job, the future they need. I come across a lot of students who are signed up for degrees that they're not interested in because their parents think it's going to lead them to a good job, you know, they're doing an economics degree because they think they're going to become a hedge fund manager rather than doing the sociology degree that they would have loved to do. So I do agree that there is something about our intake and the way in which we market what we're selling that is very important, but I also think that universities need to make a decision as to whether or not this issue of contract cheating really matters to them to be perfectly honest. You know the elephant in the room for me is TEF, and when we're looking at progression rates, we're looking at issues about the way in which universities are being evaluated and the whole sector is being reviewed. Do universities want to accept the number of people perhaps who wouldn't pass through, perhaps who wouldn't come to them in the first place? And as more and more 'bums on seats' are taken through the clearing process, I think we're not serving the students that we really have. Perhaps we're thinking much more about the students we used to have or the students we actually wished we had.

Lord Storey: Very interesting, yes person here and then we'll come over here?

Martin Seviour: Nottingham Trent University.
Nottingham has been mentioned a lot this morning. I'm a teacher, I'm a teacher of English for academic purposes, there might be a few more of us in the room. I Head a team of about 25 teachers and day in day out we work with students, primarily international students but more and more we're working with home students from non-traditional backgrounds. And what we do day in day out is we help them, we teach them how to write well academically, okay. We do this in many interesting ways and one of them is we show them exemplars, we don't show them perfect exemplars, we show them real student work anonymised and we have a proper dialogue with them. We ask them to look at it, to critique it, what's good about it, what's bad about it, how would you improve it? And in that way we teach them how to write well themselves using their own ideas and we work really hard with them on their language as well. That's what we do day in and day out. What I haven't told you is I live in Arnold and as you know your office is in Arnold, every day on my way to work and my way back from work, I stop at the traffic lights right opposite Venture House and I look in at your office and I think what are they doing in there? So my first question to you is what are you doing, what are you doing for your students that we're not doing? That's my first question.

My second question is how can you persuade us, be really honest because this is about honesty, how can you persuade us that you're not sitting there knowing full well that the things that you sell to our students are not intended for them just to submit as is, what sort of statistics do you have on that? Do you have any? Because I'm pretty

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

sure that the vast majority of them submit your work as is, and you actively encouraged them to do that. Okay you might not break the ASA rules, but it's absolutely clear, believe me, I look at your website very often, it's blocked in our university I am proud to say but at home I can see it, and you are actively encouraging them to do that. So that's the second question.

The third question is, why on your website is there a picture of you standing in front of the Nottingham Trent University logo? On what grounds are you doing that? You don't work for us, I am not sure of any connections you have with us, we can show it to you, I've just seen it this morning. So please, please, please remove it, put a different picture, okay. So three questions, I'm sorry there's so many.

Lord Storey:	I think Daniel's [*applause*]
Daniel Dennehy:	Okay Gareth, I appreciate your passion, I mirror it, I really do. Number three that you talk about in terms of the image, I'm not too sure, show me later.
Martin Seviour:	You can see you in it at the back.
Daniel Dennehy:	Yes okay, I'm not sure about that.
Lord Storey:	Yes okay let's get the answers we've got three minutes.
Daniel Dennehy:	So what do we do differently that you don't do? Unlike yourself students don't have as much contact time with the lecturers, it's proven right now. A lot of the feedback that we see, not just from ourselves but student statistics are showing that the contact time with the lecturers is getting less and less year on year, it's a fact. So what can we do differently that you potentially… not yourself but other universities or lecturers cannot do? Well we can provide a model answer, it's a great learning tool. It sets the example, they can read exactly what they need to produce, how to produce it, the arguments within, the content, the context, it's a great learning example. Now we're not saying go and hand it in that's the furthest thing from it, that's unfortunate we can't police that side of things, and again it's probably why I'm here today to talk very openly about, look is there a potential of working together to say look every model answer that we do provide we can show you a second version of that that we provided to your students. We've got no problem in that at all, the problem is if you're deterring the uses from the students and saying oh you can't use this company, you can't use that, from a business perspective, that's not a working business environment that we can cope with right now, it's something we can learn to work with, but it's got to be give and take from both parties in that perspective.
Professor Roger Gibbard:	University of Reading. [Transcript gap] alternatives. Make your offer now if you want self-regulation of your industry, then why don't you make all your work available to the people who are sponsoring this morning's event and

put all your work through Turnitin, then we can spot it, you're taking the emphasis off us, we can spot it.

Daniel Dennehy:

I'll come back to yourself.

Number two in terms of statistics, again going back we cannot police that, we very much heavily emphasise that you cannot submit the work. What they do with… post that we have no control over, and that's something we do want to have control with, but just submitting all the work we've ever done previously to Turnitin, what will that do? It will just shift demand from ourselves to someone else, someone that isn't willing to work with you. So where's the problem, all you're doing is shifting from A to B, what we're saying is work with us, we'll happily work with you going forward, that's as simple as it is right now.

Lord Storey:

Thanks very much. I mean I would guess Daniel that you work for the company so some of the questions that are being, or the frustration from people, should be actually targeted at the owners of the company and maybe your chief executive or whoever owns the company. But thank you for your honesty. We've got one question left I'm afraid, but we can go to… the other questions can be picked up in the second session if that's alright. I think the lady in the middle there has been trying for quite some time, you'll have to come round, can you pass the microphone along. But those people still wanting to ask questions can do it in the next session, okay.

Dr Stephanie Sandland:

From the University of East London.

I have got a question for Rachel and Deborah. We've heard that students, we need to look to our intake and that students are scared and as a lecturer, I would say yes and yes. So if we look to our intake, we are getting students who are scared because they have come through the schooling system with SATs, SATs, SATs. I've had a head mistress talking to me saying do you suffer because we teach to the exam? And I say yes. And so we have students who daren't submit without getting feedback from us first and we say no, so they're frightened about their work so they look elsewhere.

Lord Storey:

What was the phrase you just used SATs?

Dr Stephanie Sandland:

SATs, SATs and SATs…

Lord Storey:

Oh right.

Dr Stephanie Sandland:

…that's the problem that we see.

Lord Storey:

It's phrase that I could use, that's very good. Okay Deborah first.

Dr Deborah Rafalin:

I can't disagree with you at all. And I think that many of my academic colleagues have not necessarily had the time or space to evolve their approaches to assessment and teaching or the resources to do that, the support from their universities to enable them to support the changing population of students that we have. Really we should perhaps be revisiting how we assess, starting only with formative assessment and taking that more programmatic approach that I was saying, a more overarching approach so that students are getting the

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

extent of necessary feedback, are learning and understanding what assessment can actually mean in terms of their development, re-learning an approach to assessment rather than just seeing it as a final mark. But there is a very big gap from what we're expecting, from what most of our students, certainly for me in a London university, are coming in with. And I think that universities again need to make decisions about where they're going to invest their resources. Are they going to really invest resources in teaching and learning in line with the shift and the focus on the TEF or are they going to say they are but still focus only on the REF and on research in terms of the day to day functioning? So I think it is a matter of choice but certainly there needs to be a strategic shift.

Lord Storey: Rachel?

Dr Rachel Maxwell: Okay one of the things I didn't mention that we're doing at Northampton is revisiting that induction process as well, so sort of making that step from school/college, whatever, to university, looking at what it means to study at university. Unlike what Daniel was saying earlier about contact hours going down, we're actually increasing our contact hours in terms of embedding academic skills development for all our students across all programmes in a way that's tailored to that particular programme. So we know our students don't want to come to a generic skills session but they do need that help embedded in the modules in the programmes at a time that is important for them and that is relevant for what they're doing. So we are revisiting that side of things. We are looking at the types of qualifications that our students come in with as well, so we've identified particularly that its students from BTEC backgrounds who particularly find that struggle, you know, that notion that final doesn't actually mean final because it didn't, you know, they could get a lot more feedback in you know going backwards and forwards much more, and we've found that actually they need more understanding of the fact that when we say this is a deadline, it's your final deadline, you know, this is not something that you just keep reworking time and time again until you hit the standard you know. So yes, we've got a whole raft of other initiatives in place that are helping our students to make that step up, to recognise you know what this is difficult, it is a challenge, yes you are going to struggle, you might fail, but you know that learning journey isn't a one year thing, or even a six month thing, it's a three year programme and that's what we're working with you to achieve.

Lord Storey: Thank you, well can we show our appreciation for this panel session. So moving seamlessly on to Professor Dominic Medway, wherever you are, oh there, pop up anywhere in the audience, from the University of Manchester Metropolitan University.

Professor Dominic Medway: Are we all set?

Lord Storey: Yes we are off, good.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Detecting malpractice - active online searching, technology solutions and ensuring effective marking practices
Professor Dominic Medway, Deputy Pro-Vice-Chancellor, Faculty of Business and Law, Manchester Metropolitan University

Good morning. I welcome the opportunity to talk very briefly today to the session theme of detecting malpractice. My direct insight in this area comes through some research colleagues and I recently carried out, which is available in our paper in the British Educational Research Journal, shown here on the slide. You can access the paper online; and it's on open access so can be downloaded for free.

We were initially concerned about essay mill submissions compromising the assessment process at our higher education institutions, and this led to an exploratory study which aimed to understand more about essay mill providers and how they interact with students. Three research questions were posed.

- First of all, how do essay mills reassure potential customers about the products that they offer before purchase?
- Second, how do those essay mills negotiate ethical issues for their users?
- And third, what is the quality of the tangible product; i.e. the written assignments that essay mills provide?

And in terms of detecting malpractice it is the third of those questions that is the most relevant to this session; so I will not discuss the other two.

Building on some 2017 work by QAA, our research approach was to proceed through the essay mill transaction process, including interaction with essay mill employees in forums like online chat, purchase of the product(s) offered, and the subsequent interrogation of product quality through grading and the plagiarism detection software, Turnitin.

Phase 1 of the study investigated five essay mill providers using covert participation observation, where we posed as an undergraduate student in online chat.

Following this, a 2000-word, Level 6 undergraduate assignment was purchased from two of the essay mill providers. We ordered assignment 1 from one provider at a 2:1 grade for £250, and assignment 2 from another provider at a first-class grade for £370.50. Both providers promised a 15-day turnaround, which they met. The requested assignment title was the same in both cases and covered the topic of branding in the 21st Century. Further detail on the assignment content, despite requests for slide decks from lectures, was limited so as not to over direct the nature of the product delivered. We wanted to explore how essay mills interpreted and responded to the task.

On receipt, both assignments were subjected to Turnitin software. Assignment 1 had a similarity index of 24%, with the largest individual match being 3%. Assignment 2 had a similarity index of 14%, with the largest individual match being 2%. I have to say that those Turnitin scores, bearing in mind the time pressures a lot of academics are under, would not have been enough to raise further investigation at many institutions.

Following this, we had the assignments marked by ten academics at different universities, who were willing to take part in the study on the grounds that they were marking an assignment but did not know its origins. The markers were acknowledged experts in the field of branding and marketing.

Assignment 1, ordered at a 2:1 grade, received a mean mark of 60.3% and seven markers considered it to be of least 2:1 standard. For Assignment 2, ordered at a first-class grade, it averaged 59.5%. Six markers considered the work below 2:1 standard and only 2 judged it to be of first-class standard.

The sample of markers was not large enough to draw any kind of statistical inference, but it is revealing nonetheless, not least in the large mark range received for such a small sample. On assignment 1, and this is of great concern, these marks varied between 40 and 75%, and on assignment 2 between 50 and 85%.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

What are the tentative conclusions that we can draw from all this? Well at the broadest level we identified that essay mill assignments were able to pass successfully, i.e. undetected, through the assessment grading process, although the mark the work will receive is less certain. And this suggests that university assessment techniques, at least for discursive based assessments in the social sciences, are vulnerable to essay mill submissions. Further, this vulnerability is compounded by clear inconsistencies in grading. To counteract this I think we need to do two things:

First, continue to improve the efficacy of our systems of detection for contract cheating or passing off.

And second, and perhaps even more of a challenge, our HE assessment processes may need to move away from discursive forms of assignment-based coursework. This might require a stronger focus on timed and invigilated assessment techniques, or the use of a viva voce to support written work. These approaches are arguably less vulnerable to essay mill interference as they require the students to present themselves in person to achieve the assessment outcome.

Although I would close by cautioning that these methods of assessment are also not immune to malpractice as current conditions concerning the identify verification of students under exam conditions clearly testify.

Thank you.

Lord Storey: Thanks very much.   So where's Bill from Turnitin, who is Vice President and the sponsor of this event.

Detecting malpractice - active online searching, technology solutions and ensuring effective marking practices
Bill Loller, Vice President, Product Management, Turnitin

Thank you and good morning everybody.

So I thought what I would do is speak for a few minutes about what we're doing in the space, in partnership with the overall sector to help prevent contract cheating, and then throw it over to Dr Ellis to speak a little bit more deeply about some of her findings in the space.

So I assume everybody is familiar with Turnitin, yes, the common reaction. Thank God I was the generation that missed this.

So the quick history of Turnitin is, of course we started about 20 years ago, some PhD candidates at the University of California, Berkeley, and over the course of their tenure as teaching assistants there started getting into understanding that their students were plagiarising and wanted to do something about that.

And so we started off with the very simple concept of let's go across some websites, like the early versions of Wikipedia, we'll index that content and then we'll go and see if anybody copied it. That then led to students figuring out what we were doing and deciding, hey I'll just borrow somebody else's paper and submit it instead. So that led to the creation of our student paper database which has over a billion papers in it today.

And then, yes students being as creative as we've found from the early days of China, started going for other sources like research publications and so as they continued to advance, we continued to advance.

About 4 or 5 years ago now, our little world got rocked, as well as most of the Australian higher education sector with the MyMaster scandal. I'm not going to go into that in detail, I know Cath will talk about that, but it was really the first very public exposure of contract cheating as a problem, where it made out of academia, it made it into the mainstream press and there was a lot egg on faces and people wondering how this could happen, and wringing of hands and all of that. That was, I think, November 2014.

So not long after that we had a visit from one of our customers in Australia, he came to our Oakland office and basically sat down with our CTO and said, what can you do? And we actually didn't have a really good answer at that point, and so that embarked us on a multiyear research project to really try to figure out, well what is the problem and who is the problem and how are students getting engaged with this.

And so we didn't immediately jump to technology, we didn't understand what to do at that point, and so that led to this research and we interviewed probably 20 different institutions in Australia, we interviewed students, and we had people crawling the contract cheating sites, and that in itself was just eye opening because there are millions of them, right. There is, if you are an English student in Tanzania and you need somebody writing with American English there's a site for you. So those things are everywhere.

And so as we kind of exposed this problem we understood that the way that we had approached technology to date was not going to work, right, and similarity is not the problem, the actual determination of the author is the problem. And so this led to our concept of something we call Authorship Investigate.

And so what we did is, once we figured out, okay here's the scope of the problem, here's how we think it's kind of working, that led to the technology path and that really came down to a couple of different things. I mean at the highest level what we are doing is looking for differences in style and structure between documents, and that gives us a really good indication, it's not a perfect indication, but it's a really good indication of whether somebody wrote the work that they actually submitted.

It's a lot more nuanced than plain plagiarism, you know, but contract cheating is in fact a form of plagiarism, but what, what I'll call kind of run of the mill, you can actually kind of point to, here's the source, here's where

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

they got it, we know what they did. With contract cheating it's not that easy, and so the combination of the technology plus human judgement really gives you the indication of whether they did what they said they did.

One of the things did in order to build out this capability is, we engaged with forensic linguists which is just really a kind of fun thing to say, forensic linguists. We worked with a number of really intelligent people in the field, one of the foremost of whom was a guy named Robert Leonard, if you are ever interested in learning more about this field I suggest you go Google him, there's a ton of his stuff on YouTube, but really these are the people that, for example, when a law enforcement agency is called in for a kidnapping and gets a ransom note, they are the people who look at the ransom note and from the text, the style, the vocabulary, everything there, try to determine, well who wrote this, or where geographically did they come from? And so we've adopted those techniques and put that into the technology.

As I said the technology is not the end all be all answer, and so as you've heard today I think there are combinations of educating students, just raising awareness about the problem, getting the right policies in place and combining that with technology to help protect the institution and hopefully deter students. And the marketing around this stuff, around contract cheating, is really, really sophisticated, you've heard about the leaflets on campus, the back of the toilet stall door, pretending to be from the university, pretending to be endorsed by the university, sending emails that look like they come from university accounts. There's a million ways students are getting sucked into this and so getting ahead of the problem is the first step, the technology is only the backstop, really trying to protect the reputation of your institution at the end of the day.

So myself and some colleagues are here today if any of you would like to learn more, please come, I'm happy to talk about it in more detail, we can tell you more about how it works without letting the UK essays people know. So happy to do that.

Thank you very much.

Lord Storey: And other products and programmes are available as well. So where is Cath, oh you're there aren't you.

Detecting malpractice - active online searching, technology solutions and ensuring effective marking practices
Professor Cath Ellis, Associate Dean (Education), University of New South Wales

Good day everyone, I am the prophet from the foreign land, it's appropriate we're in the Over-Seas house.

My name is Associate Professor Cath Ellis. I'm the Associate Dean for Education in the Faculty of Arts and Social Sciences at UNSW, which is in Sydney.

I think I'm quite unusual in this discussion, and do let me know if you're like me, but I actually done quite a lot of research on this, I've published, I think about seven papers, six or seven papers in the last year and a half or so on this topic. I've been involved in a survey of 14,000 students and 1,100 staff, you know, really empirical research. I'm also up to my elbows in contracting cheating investigations, in fact I got a referral a couple of nights ago, so I actually do investigate the cases. I look those kids in the eye; this affects their lives and that really upsets me. But I also am involved in writing policy, procedure, workflows, strategic workforce plans, all that kind of stuff as an educational leader at a big 55,000 student, Group of Eight University on the East coast of Australia.

I don't know if many other people are in that sort of space about doing all of this, but one of the things I've really noticed is, yes there's a huge amount of research and conversation going on about this at the moment and that's fantastic. And there's a lot of stuff, particularly coming out of Australia, academic research, which is about the demand side of the problem; research by me and my colleagues but also Phil Dawson, Wendy Sutherland-Smith at Deakin, Ann Rogerson at Wollongong, I could go on and on, Christine Slade at Queensland. Really good research coming out on the demand side of the problem.

Michael Draper's here and my colleague Alex Steel are doing some really great stuff on the supply side of the problem looking at it through a legislative lens. And there's some great work going on there and I refer also to Lord Storey's impassioned leadership of this through the Parliamentary system here in the UK, and there's legislation coming out in Australia, there's existing legislation in New Zealand, it's coming through in Ireland, and in 17 US states.

There's also some other really interesting stuff. Obviously, the Advertising Standards Authority, thank you for your work, it's great. And passport fraud has been used in the US to try and catch students who are using TOEFL exams inappropriately. There's lot of that work going on as well and that's great. But there's this big, big gap in the middle and that's what I want to talk to you about today.

That stuff, it's great but I talk about it as nibbling around the edges. We need to focus in on the core of the problem and that is the administrative compliance function of Universities and other education providers to investigate and substantiate allegations of serious academic misconduct – of which contract cheating is a part – on balance of probability. It's what we do. We actually already have legislation. In Australia it's called the HESA Act, the Higher Education Support Act 2003, and the HESF, the Higher Education Standards Framework (Threshold Standards) 2015. We already have legislation that obliges us to comply with it in order to investigate these cases at University and I do that on a daily basis. And, in fact, I'm proud to report that at UNSW as a direct result of the MyMaster Scandal we had in 2014 and 2015, the UNSW has had a 2,300% increase in contract cheating investigations from 2017 to 2018. I'm not telling you the actual numbers but that's a big increase I think you'll agree.

We're getting yield. Why? Because MyMaster shook us up. UNSW was on the front page of the *Sydney Morning Herald* for about six months and it wasn't a nice place to be. And, as a result of that, we have changed our structure, we have changed our approach and more importantly we have changed our resource. We've gone from having one person in that centralised compliance function in 2014 to now having 10; we're putting our money where our mouth is.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Why is this administrative compliance function so important to me? Well detection to my mind is the most critical problem at the moment. And it's where the problem is occurring. I would argue that contract cheating does not occur until that work has been submitted to a university for assessment. It's not when it gets purchased or when the student does some more work on it: it's when it gets submitted. And it's actually where the effect is felt. It's where the student is not demonstrating that they have done the learning and met the learning outcomes for that particular task. That's where we need to put our effort: it's the School Student Ethics Officers, it's the Student Conduct and Integrity Unit, it's people like me on the ground doing the work day to day.

And let me run through how it feels. It's incredibly hard to prove. It is designed to be difficult to detect, that's its efficacy. It's hard work. I tend to do this work of an evening because it's when I can get a good run at it. And it's bloody time consuming.

We are, with a 2,300% increase in cases, really grappling with the problem of caseload. And can I just put it to every university representative here, that is where I would be putting my attention right now. What if you had a MyMaster scandal happen to you next week? Would you be able to deal with the caseload?

So, student wellbeing. I had a case last year where we didn't know if our student was alive or dead for a week. That was not fun. He's fine and well thanks to the Police finding him. It's insidious. It's constantly changing. The blackmail problem now is an industry in itself and if you haven't experienced it yet, just wait. The kidnapping problem that comes alongside this is also a really challenging one. And as you can probably tell from the emotion in my voice, it's emotionally draining and it's highly sensitive. This is not the sort of thing universities want on the front page of the paper. And from my experience, until recently at my university at least, it was poorly resourced and it was unrewarded and unrecognised. This is not the sort of thing you put in your promotion application: how many cases of contract cheating you raised last year. I was told not to put it in my promotion application. It's done in my own time, it's driven by goodwill and that gets burned very very quickly.

So – to the people talking about the legislative solutions, I beg you don't make this problem harder for us. If this becomes a crime, particularly a crime committed by students, that puts further downward pressure on reporting which is already highly pressured. And it holds up our investigation process, we experience it at the moment with Working With Children Checks for students on practicum for education. If there's a breach we have to stop everything we're doing until the Police investigation has completed and that holds the student's progression up. And it also amplifies that impact of false positives, which do happen.

What do we need? We need resource and we need support. Universities need to be helped to put the resource in the right place to really support this central administrative compliance function for us to therefore comply with the legislation that's already there and for us to get better at detecting this.

Lord Storey: Thank you very much.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Detecting malpractice - active online searching, technology solutions and ensuring effective marking practices
Questions and comments from the floor

Lord Storey:

Okay we've got 15 minutes I think or so. Questions, there's somebody at the front here and those people who didn't get chosen last time, if you wave your hand up we'll know you deserve to be called first.

Dom Kingaby:

From the DfE.
I'd like to ask Bill something and perhaps any academics who carry out assessment in the room. Would it be feasible for some subjects, as part of that kind of forensic linguistics approach, would it be possible for some subjects for lecturers to give their notes and to put their notes into the system, because if you're being taught a subject by somebody, wouldn't what's said to you in the tutorials and lectures be reflected in your essay? Would that be something that was feasible and workable?

Bill Loller:

Yes it's something we've certainly looked at. I think depending upon the discipline that you're investigating, we have to treat things differently. And there's certainly, if you think about it like when if you're in computer science, you're typically provided with, you know a starter piece of code to work with and so there's going to be similarities and things like that that you need to take account of. And so we actively investigate things like that as part of how we expand on our solution.

Lord Storey:

Okay the person here?

Dr Nina van Gessel:

One of the Contract Cheating Leads at Roehampton and I too have a couple of points/questions for Bill.

We considered becoming involved with the Office of Investigation last year. We had a presentation, it was very interesting, but ultimately, we decided not to do it because we were unconvinced that it would be effective. And it seemed to us that the work that would be required by staff, to decipher the reports, was very time consuming. It didn't seem intuitive and we felt that staff would need a lot of support, support we could better give in the form of teaching them how to give more effective assessments to afford it in the first place. So I suppose that's my first question, what would you say to change my mind perhaps for example the reports have become more intuitive now?

And my second point is a broader question and it relates I suppose to that rather facetious comment that was made earlier about other programmes and products exist, because my understanding is that in fact they don't, that you have a total monopoly, which is fascinating. And I gather, I don't know much about this, but I understand there have been some questions raised lately about the sheer data that you have access to and the fact that many other companies, if they had access and possess this kind of data, would come under some

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

investigation? So just again I'm curious to hear what your thoughts are in regards to that.

Bill Loller:

Sure. So in terms of the complexity of the solution, so I guess there's three points I would make around that. One, because this is more nuanced we can't just give you a similarity score and say hey here's the percentage. I think that's self-defeating in fact. Two, we did start off in a pretty complex place as we were trying to get our hands around what's actually the meaningful information. What you're referencing is we did, because we weren't… we didn't want to just throw something out onto the market, we actually partnered with the sector and with what we called early adopter partners who actually helped us prove the efficacy of the solution. So what works, what's meaningful, what is it meaningful? So we could start to get to something that actually became a time saver for faculty and staff versus having them puzzle through a report and try to figure out is this meaningful or not.

I think the other thing is, the solution's going to continue to evolve. We continue to work with the forensic linguists and continue to understand what really is meaningful and so I think probably the last, depending on what report you saw, it's changed pretty dramatically. We'd be happy to show it to you again.

You know in terms of, you know referring to Turnitin in a monopolistic fashion because of the data we have, I mean there are competitors, there are other people out there trying to solve this, some with technology and some manually. I think that one of the things that we've learned is that with anything that involves machine learning you do need really need good datasets and so a lot of our effort has gone into creation of a dataset versus leveraging the data we have. And so I don't think that is a barrier, I think it's people putting the time and attention and resources on this. I think that's where we've been able to make a real difference and I think, you know, what we have been able to leverage is less our data and more our relationships within the education sector because of the wide partnerships we have. You know we started in Australia, but as many of you here in the audience know it wasn't long before we were here in the United Kingdom talking to any number of universities here. And, finally, now we're working with our own United States universities who are far behind the curve in terms of understanding the problem. And so I think that's the advantage we bring, it's not a monopoly on data.

Lord Storey:

Thank you. The person here?

Dr David Jenkins-Handy:

I'm going to start with your second question first and so: there probably isn't much evidence in the public domain yet about that. But I would agree with the sentiment of that conversation that's been in the room and this is something that has been talked about at length in the research that I've published with my colleagues, particularly Tracy Bretag and Rowena Harper. This is a perfect storm, you know. This is very complex and nuanced as Bill keeps talking about. But the way that higher education funding is working in

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

different sectors around the world is contributing to this problem absolutely.

But I want to go back to your first question, which is about red flags, and in fact one of the things that I'm working on at the moment with my colleagues in the Student Conduct and Integrity Unit is actually to categorise the different evidentiary sets that we're using and the different evidentiary standards that we are developing, because of the experience of the volume of cases that we're now investigating.
And by far and away the best and strongest evidence we're receiving is the dataset that was given to us by Fairfax in the MyMaster scandal. Getting that big pile of 'smoking guns' we had 23 documents and 19 students who were investigated, that's in the public domain, that's how many we dealt with back then. But we also get very strong evidence regularly from whistleblowers. Show of hands who has experienced whistleblowers coming to them? Yes it's quite common now. There's two types generally speaking. There's vigilantes so there are, you know white-hat whistleblowers out there doing the investigative work that Thomas referred to and Thomas has been a part of, and Robert Clarke did a lot of it as well. But also we get calls from contract cheating writers whose student clients didn't pay their bill, and that's not, I'm sorry I'm not laughing because they often cc the student in. And that's what I'm talking about, see it suddenly went cold then, didn't it? These issue human beings we're talking about, their lives, you know and the risk of student self-harm is real, and that's why I get so angry about this. But also we get ex-boyfriends, ex-girlfriends, we had a situation where the ex-girlfriend dubbed in the ex-boyfriend and then rang us up and said 'oh we've got back together, can I take that back?' And we said 'no'.

But, then below that you'd be amazed at how much evidence we're able to get from the structure of the document, and this is where we worked hard with the early adopter programme for the Authorship Investigate tool. The way that that tool has allowed us to gather that information very, very quickly: document properties that don't seem right, students leaving 'surname goes here' accidentally on the header. I've heard anecdotally of a note left at the end of a paper by a student's mum saying something like 'I hope your Professor likes this paper, love Mum' You know, those kinds of thing: they're also really hard evidence.

And so there's lots of those kinds of things that we're starting to look for. I guess what you're hearing from me here is quite different from what we're seeing in the published literature about how to train academics to spot this problem. And this is the thing that people like Phil Dawson and Wendy Sutherland-Smith will be first to acknowledge that the amazing work they've done on training academic staff is great at raising suspicion but the challenge remains: how do you turn that suspicion into evidence that you can actually put to a student in an allegation, to substantiate an allegation of contract cheating on balance of probability.

So other things like software use, IP logins to the VLE, and we really get down to things like linguistic features use of idiomatic phrasing, you know we've put it to a student what does 'to all intents and

purposes mean', and the student didn't know. So what I'm calling for at the moment, we've made great progress on this at UNSW and I'm proud to say that UNSW will have an institutional maturity on this that is probably hard to match at the moment. We really are, I think sector leaders in a sector that is leading. But we still have so much to do and it's a call to action to colleagues in the UK who are leading on this at their own institutions to share the learnings that they're having from the investigations that they're doing. Even if you're only doing a handful of cases a year or one or two cases a year, every case I do, I learn from and it adds to our pool of knowledge. We need to share in a community of practice what's working well from us, what are our red flags. I hope that answers your question.

Lord Storey: Yes, the person over there?

Dr Jill LeBihan: Yes, so with review and you partly answered my question, yes

Professor Cath Ellis: Sorry where are you from?

Dr Jill LeBihan: I'm from Sheffield Hallam University, sorry.
We recently had a case where our Director of Compliance and Policy wanted to use student logins as a means of then educating them. So students who'd logged in to essay mill sites that we have on record, or have tried to, they're the ones that are blocked by our system but we have a record of their login right. So she wanted a kind of auto message generated to those students to say this has been happening. And what's really interesting is in our community that kind of sets some hares running, so there was a whole group of people who said oh don't let them know that that's what you're doing. That's one set of people, and the other set said, what do you mean, it's totally unethical, you have to tell the students you're going to do this, you have to warn them. And are we able to do this anyway, is it in their GDPR statement? So I'm just wondering whether other people, I mean this is in terms of a community practice, whether other people currently do that whether you have kind of compliance and legal issues around that and whether there are other solutions?

Professor Cath Ellis: Yes and I know there's a university in Australia who's doing something really similar so they block the sites, the contract cheating sites, and I think I've heard people say today that UKEssays is blocked at their university, that kind of thing. We don't actually block any at UNSW because it's a bit 'whack-a-mole', you know you block one and another one pops up. But then they're putting a message out there to warn the students. But I mean one of the other things is students are really struck by how much we know about their behaviours, you know, if they log on to the university Wi-Fi and do stuff, we know about it, you know it's pretty obvious. If they login to the VLE while they're in the toilet during an exam and it matches the invigilator log, we know about it, I mean. But yes I think the GDPR thing that you guys are all focusing here in Europe is a challenging one, one that we're not necessarily faced with, but you'd be amazed on how much you can actually do with a student who has signed an agreement to be a student and agree to join your academic community. How much you can actually do without any breach of privacy because of the legislation that already covers us.

So, I think that's one of the things that you should equip with yourself with: knowledge about where your limits are and where appropriate behaviour is rather than assuming that you can't do things.

Lord Storey:

I had a company came to see me where they had, now bear with me I might have got this slightly wrong. They came to see me, they had a programme, which they're trialling in one university whereby the student has to use… the programme is put in the computer they had to use that computer and the computer is able to tell, not just through words and phrase and the rest, but they were able to tell by eye movement of the student whether they are cheating, which I find a bit scary. But they have had sort of like 90%, they claim 95% success. I just haven't had the time to follow that up but if anybody else is interested and would like to meet this company, I've got all the contact details.

But they have got… one university is trialling this and finding it quite… if they're here, please say so, and finding it quite successful.

Professor Cath Ellis:

That sounds like a virtual proctoring tool so it's a virtual invigilation tool, so it's checking to see the student behaviour, if they're doing an online exam at home, which is a slightly different thing to…

Lord Storey:

Let me send you the details and then you can have a look at that?
Yes please?

Dr Walter Wehrmeyer:

University of Surrey.
We've done our own sort of survey amongst the students trying to figure out how big the problem is and we found estimated numbers that about 500 students are buying essays at least once a semester and about 6,000 maybe 7,000 students would be tempted if… and this if it's primarily driven by fear. We had two different faculties engaged with that; one faculty has been saying as part of the engagement with the students about academic integrity if you buy an essay you will leave the university. The other faculty has not said this. We then asked the students about penalties and what they think about it and the evidence we have is that the only thing that these 6,000 students are preventing from buying essays is the fear of being found out, therefore the detection issue and the legal issues are very, very important. Part of that, I think it would be far easier if UK Essays could watermark any output they have with a suitable watermark that cannot be taken out of the PDF file and I think that would offer the whole discussion far more clearer. The main worry I have with the detection system is that the big worry about contract cheating that I have are not the humanities students but the nurses, the medical profession, the aircraft engineers, the bridge engineers, those kind of people who would leave the university without the competence as in the skills that I would like them to have. Those subject areas are so much more difficult to identify using the authorship scheme or even Turnitin, because it's a much more technical language, it's much more about equations and that kind of stuff. That's a more fundamental problem.

Lord Storey:

Okay thank you.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Professor Cath Ellis: I agree.

Lord Storey: I think we all agree.

Professor Cath Ellis: My boyfriend always jokes that he doesn't worry about the nurses because they can only kill you one at a time but the engineers can really polish you off. But can I just say there are universities, like my own, pursuing other investigative lines of inquiry that are having objective yield in STEM subjects and it's really the volume behind that increase that I quoted to you in our numbers of students who were suspended or permanently excluded is mostly in STEM subjects. So there *are* ways of doing it, we just need to share how we're doing it with each other.

Session Chair's closing remarks
Lord Storey, Liberal Democrat Lords Spokesperson (Education)

Can I just conclude by saying just a few thoughts.

One is we must never criminalise students in this, what we should be doing is supporting students and understanding that sometimes there are all sorts of reasons, which we heard about in your presentations and universities do have to ensure that they are on the ball in terms of any mental health problems that the student might be facing.

We also have to be aware that overseas students come often with different cultural approaches to academic work. And let's not kid ourselves that this is just in higher education, this is happening in further education, it's happening in diplomas etc. etc. it's even happening at sixth form level, and that's why we've got to somehow understand how we can move forward.

I actually don't think there is one silver bullet to solve this, there are a number of things we should be doing, and why should we be doing this? Well not least because of your academic integrity. If this spirals out of control than the academic integrity of the universities will count for nought.

Secondly, what about the vast, vast, vast majority of students who do not cheat, how they feel. Having had my daughter just go from a Masters and suddenly decide to a law conversion course I know the commitment of work she did, I think about those students quite often.

And then, I think somebody raised this, I don't want my nurse or doctor or accountant, or whoever it is, to have cheated to get their qualification, I want them to actually be top of their profession.

I actually personally believe that we do... and I said at the beginning about QAA. QAA have now, and Gareth is speaking after the break, has set up a working party to look at how we might progress and they've brought a whole host of people on to that working party. I don't want it just to be a talk shop, I want to see action.

When we had the Higher Education and Research Bill, when it came to the House of Lords, I moved an amendment which would have, paraphrasing, would made this an offence. The Minister at the time, who was on Jo Johnson, asked me not to push it to a vote on the understanding that if we couldn't get a voluntary solution to this matter then legislation would be brought into place. I'm now of the view that we should have some legislation and I would look at an offence to provide, or advertise cheating services for higher education. If at any time you wanted to come and have a chat with me, I'm more than willing to listen and hear what you have to say, because we do owe it to our universities and we owe it to our young people to solve this insidious problem.

So break, let's show our appreciation to the panel, and thank you very much.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Session Chair's opening remarks
Gareth Crossman, Head of Policy and Public Affairs, QAA

Thank you very much indeed.

Welcome back to part two. My name is Gareth Crossman, I'm the Head of Policy and Public Affairs at QAA and I will keep my remarks here very brief so we can get on with a number of presentations, I think the main theme of which is about legislation. We do a lot of media work and we are often asked, you know, why don't we just legislate, why don't we just criminalise and the short answer to that is, yes that's a good idea, the long answer to that is, ah, but it's a bit more complicated, and I think we are going to hear some of the issues that might be involved.

A couple of things that I will say is that, I mean my own background is as a Criminal Lawyer working in human rights law, I mean one of the things you always used to say is that, you know, do not ever legislate just for effect, don't legislate unless there's a need, a social need that has to be met. So I think that's one of the principles that any move towards legislation has to be satisfied of. I must say that considering something we've touched on today, and that this isn't a higher education issue, this is a societal issue, I think that makes the case for legislative action far more powerful, but there are hurdles, and I think one of those which I'm sure is going to be touched on is something else we talked about, what to do with students. I mean QAA's position, absolutely is that students should not be criminalised, and it's sometimes quite surprising to realise how many people think that students who cheat should be criminalised, in my view that is not the appropriate use of the criminal law, and thankfully it seems that that's the view of pretty much everyone here. However, I won't go on any more because I think we are going to cover this ground in great detail.

So we have a number of speakers covering from domestic to international legislation and if we could start off with Dr Deirdre Stritch from QQI who is going to talk about lessons from abroad on developing effective legislation.

Lessons from abroad on developing effective legislation
Dr Deirdre Stritch, Provider Approval and Monitoring Manager, QQI Awards, Quality and Qualifications Ireland

Thanks Gareth.

Thank you for inviting another voice from overseas to add to your discussions on this topic today.

Looking at the title of this presentation, I rather fear that it over-promises somewhat: "*lessons from abroad and developing effective legislation*". The bad news is that we do not yet have legislation in this area in Ireland from which lessons on effectiveness or otherwise might be drawn. However, we are in the process of developing legislation and what I hope to do today is give you a little bit of context around that legislation, what is being proposed, the timelines associated with it, and then some initial thoughts, with big warning lights here - it's very speculative and tentative at this stage, on our initial thinking around how we might go about implementing that legislation once enacted.

So, a little bit of background, what is QQI? Quality and Qualifications Ireland is the national quality assurance body for providers of education and training. Its remit covers the 10 levels of our National Framework of Qualifications, so it covers both further (or vocational) education and training and higher education and training. QQI is also an awarding body in its own right. What that means is that providers can come to QQI and seek to have their programmes validated (approved) and thus lead to a national award in the NFQ..

QQI was established under the Qualifications and Quality Assurance (Education and Training) Act, 2012, and it was determined in the early years post foundation that that original founding legislation had some vulnerabilities and gaps, which hindered or impeded QQI's ability to fully fulfil its functions. It was determined in about 2015 that some new legislation would be required to enhance QQI's regulatory powers to amend and/or create new routes to the National Framework of Qualifications and facilitate the introduction of an international education mark. And work then commenced on the development of an Amendment Bill to the original 2012 Act. It is in the context of that Amendment Bill that we are seeing the introduction of legislation to address cheating practice and cheating services in particular. So this isn't a discreet piece of legislation being introduced to address that particular issue in isolation, it is part of a much more broader wide-ranging suite of legislative changes that are being introduced.

Section 43(a) of the Amendment Bill will provide a statutory basis for the prosecution of those who facilitate cheating by a learner, , those who advertise cheating services and/or who publish advertisements for cheating services. The draft Bill does not propose to criminalise the learners themselves who cheat but for those who facilitate cheating by learners. Under the Bill as proposed, QQI will be the body responsible for bringing prosecutions under this section of the Act. And I've put up here the URL for anyone who is interested and who wants to look at both the original legislation and/or the Amendment Bill as is currently being proposed. Qualifications and Quality Assurance (Education and Training) Act 2012 https://www.oireachtas.ie/en/bills/bill/2011/41/
Qualifications and Quality Assurance (Amendment) Bill https://www.education.ie/en/Press-Events/Press-Releases/2017-Press-Releases/PR2017-15-05.html

What are the timelines around this, and when we might expect to see legislation in this area actually enacted? The Bill itself was published last year in August, it was initiated in the Seanad, that's our Upper House, in October. It went to Committee stage in December and in February it went to stakeholder consultation. Now typically in Ireland at that stage, it would go out to broad public consultation, but in this instance identified stakeholders, including QQI, were invited to make submissions

So today, and this is probably unfortunate timing in terms of today's meeting, it is before our Seanad (Upper House) again for report and final stages. So, I imagine I can probably update you through the organisers post this event if that would be helpful.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

As I said earlier, this is a very wide-ranging Amendment Bill. The section on academic cheating has not been altered since it was initially published last year, it has not been the subject of debate in the Seanad nor have any amendments been tabled in respect of the issue. And because no amendments were tabled during Committee stage, it means it won't be the subject of discussion at report stage.

Now there are a number of possible reasons for why this has been the case, largely I think it relates to the nature of the other amendments being introduced and the fact that they have just taken up much more public attention nationally. And also because I guess this is seen as a bit of a good news story in the media and it has not been subject to the kind of scrutiny that would probably actually be useful. In terms of future steps and timelines, it's a little bit hard to gauge at this stage, the Bill is subject to various Parliamentary timetables, but the Department of Education and Skills, which is responsible for developing this particular Bill, hopes to see it through Oireachtas, that's our Parliament, before summer recess at the end of July time, though think this is optimistic. Once the Bill goes through the Upper House, it goes to the Joint Committee on Education and Skills, they produce a report and that all has to happen before it's initiation in the Dáil (the Lower House). So I think realistically we're probably looking at some point a little bit later than summer recess. The hope is that we would have enactment of the Bill by the end of this year or early next year.

So what is being proposed? I'm not sure that this is actually going to be legible for most of you, I don't propose to read through all of it, it is going to be on the slides and you can see it obviously if you go into the website that I gave the URL for earlier. I do just want to draw attention to one of the sections, just as an exemplar of the kind of language that's being used and the type of approach that's being adopted.

If we look at Section 3, I'll read it here, a person who does either the acts specified in Subsection 4 below, so Subsection 4 talks about providing an assignment for an enrolled learner or advertising the provision of assignments for enrolled learners. So a person who does either of the acts specified in Subsection 4 with the intention of giving an enrolled learner an unfair advantage over similarly enrolled learners commits an offence.

Let's just pick that up again in a second. So essentially, what the Bill is proposing is to create nine new offences, which can be grouped under four broad headings: impersonation, provision of cheating services, advertising of cheating services, and then publishing advertisements of cheating services.

Impersonation refers to undertaking in whole or in part any work required as part of a programme in place of an enrolled learner without permission from the provider, or from the person setting the assignment. It includes sitting an exam or having someone sit an exam in place of the enrolled learner without permission. Then we're into the provision of cheating services and that is providing answers or arranging for the provision of answers, providing or arranging assignments or answers in advance of an exam for an enrolled learner.

In terms of the advertisement piece, it will become an offence to advertise the provision of assignments to learners and/or the undertaking of the assignments, in whole or in part, on behalf of the enrolled learner. And then we get into slightly trickier territory possibly with the publication of advertisements, which will in and of itself become an offence and this will pertain to both traditional media types, but also to social media, etc. And I understand that there are other discussions being initiated with social media platforms I'm not privy to where those conversations are at currently, but we would be taking a collaborative approach to implementing legislation in this area.

Now back to the language that I highlighted on the previous page. I should say at this point that we did liaise with Michael Draper who is here with you and who I think will be talking to you shortly, and with Phil Newton last year around what was being proposed and they very generously and kindly gave their time and highlighted some potential shortcomings in the language as currently drafted. They have, of course, no responsibility for the text of the draft Bill.

The Bill as currently proposed does not set out these offences as strict liability offences and I think the rationale behind that is that the legislation, as currently formulated, doesn't address essay mills or that type of entity exclusively. It is possible, and likely, that those committing these types of offences in many instances

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

will be other learners, and/or their family and friends and other people who may be assisting, as they view it, a learner and so unintentionally landing themselves in this sort of territory.

There is no appetite either at a Government level or within institutions themselves, to criminalise learners or their families. The view is that there are existing structures in place within institutions to deal with learners, but nonetheless this might serve as a sort of a warning signal to learners, as a deterrent to engage in this type of practice.

So this is where our warning bells come in again. This is very tentative, it's very speculative, we have not had lengthy internal discussions as of yet either within QQI or with the Department [transcript gap] as to how this piece of legislation might be enacted when the time comes. However, our initial thinking at this point is that there will be a multi-faceted approach and the legislation, will be one tool in a much broader toolkit used to enhance academic integrity and to address cheating practices by learners.

Whilst the new legislation pertains to all levels the National Framework of Qualifications with the exception of school awards - it's not restricted to higher education only - it will apply to vocational education training also, it is likely that QQI will address higher education and training primarily in the first instance as it is considered that this is the area of highest risk. The implementation is likely to focus on enhancement initiatives and communication rather than the creation of a large formal legal entity that is going out there proactively seeking prosecutions. There is a very practical reason for that too, we are simply unlikely to have the resources to take on that kind of activity.

There are likely going to be three strands to the national approach; enhancement as I've said, it is probable that we will establish an advisory group of some sort to assist QQI. We need to have an evidence base to work with in all of this, so we would like to establish the scale and type of cheating activity that is currently practiced in our institutions, how are institutions currently addressing cheating practice when it's identified? What sort of punitive measures do they have in place when cheating is confirmed? Are measures working? What sort of rates are they looking at, etc, etc? What types of cheating? And the outcomes of that body of research will then inform any subsequent communication strategy and/or enhancement initiatives that we undertake.

The advisory group is likely, I'm deliberately using that term a lot, to include membership from the institutions themselves, and from other national stakeholders the department, our funding agency, etc.

There will need to be communication strategy to inform the relevant stakeholders, we have providers, learners, advertisers, and publishers. They will need to know about the new law, they need to know about the implications of it for them, we will need to identify their responsibilities under the new legislation and indicate any procedures that have been developed for reporting suspected offences.

So a huge amount of work as you can see that needs to go into all of this at this stage. There has been some discussion internally on developing a media campaign, perhaps through things like YouTube directed at learners to raise awareness of academic integrity issues in general, and why cheating does a disservice to them and to their fellow students. Rather like the insurance campaign that we have, you know, when your neighbour cheats on their insurance, it raises the premium for all of you. The impact of cheating is wide-spread, you are all affected by this. And we would work with the National Students' Union, etc. in developing initiatives in that space.

And then national coordination, QQI is a regulatory body, but we have regulatory partners in the country that can work in this area. So because the legislation looks at advertising and publishing, we will need to liaise and coordinate our efforts with the Advertising Standards Authority for Ireland, and the Department of Business Enterprise and Innovation but also likely the national funding bodies, etc. And the idea being that we would look at ways of best pooling our resources and using the tools and powers available to us, individually and collectively, to address the various issues raised here today and through the legislation itself.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

So as I say, this is tentative at this point but I am happy to keep colleagues here updated, we regularly liaise with the QAA and we'll be keeping the authorities in the UK updated on where we are at, and we will be making this PowerPoint available afterwards.

Thank you.

Gareth Crossman:	The instructions I have is that I have questions at the end, but with six presentations I think the way to approach it is probably if anyone has any… you can get lost if you have to wait that length of time if you have any burning questions that you have, that you would really like to ask now, please do ask them now, otherwise if you can wait for the question and answer session at the end. But I don't want Deirdre to have to wait all that time when someone has a burning question.
Dr Deirdre Stritch:	Sure. Or no as the case may be.
Gareth Crossman:	In which case if Professor Julia Buckingham from Brunel University.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Legislation as a strategy for prevention and other options to consider
Professor Julia Buckingham, Vice-Chancellor and President, Brunel University London

Good morning everybody and firstly thank you very much to the organisers for inviting me to talk to you today. I think the reason I was invited is because I was one of the Vice-Chancellors who signed a letter to the Secretary of State a few months ago calling for legislation specifically against essay mills. The letter didn't address other forms of contract cheating, although obviously those are very important and worrying.

The first question I must answer for you, is why I feel so strongly about it? The UK has an absolutely world class higher education system and it's something that we should be incredibly proud of. I am delighted that we have colleagues from Australia here today who also have an excellent system, and so too does Ireland. But, as a Vice-Chancellor in the UK, I am very interested in protecting the integrity of the UK's higher education system. We are very fortunate here in the UK that all of our young people who have appropriate entrance qualifications can take advantage of our higher education system. We also have students from across the globe wanting to take advantage of our higher education system. And of course our graduates are sought after by employers, not just in the UK, but right across the world. If you look globally, a very large number of people in senior positions have been educated in our universities. And that's something that I think UK plc should be extremely proud of and we should ensure that we protect.

But reports of essay mills, and we don't really know what the prevalence of use is, and other forms of contract cheating, risk undermining the integrity of the whole of our higher education system. Cheating cheats and devalues the system, its cheat employers who think the individual achieved something they haven't and it cheats society.

Very importantly essay mills and contract cheating also devalue the efforts of millions of students, indeed the vast majority of our students, who are incredibly honest people who work extremely hard to achieve their degrees and who would never dream of cheating. Whatever we do we must protect the interests of these very honourable citizens.

While I am very interested in exploring ways in which we can introduce legislation ideally to ban essay mills and the advertising of them, I do recognise that legislation alone would not be a magic bullet. It has to be part of a basket of much wider measures that we in the sector, and in partnership with others, take to try and overcome the problem.

Why do I think legislation might be valuable? Like Deirdre, my principle reason is that I believe it would act as a powerful deterrent. I'm not suggesting we criminalise students, that would be horrendous, but I think students would think very hard about whether or not to engage with something which actually is illegal. It would act as a deterrent, but as I indicated earlier, it needs to be part of a broader message that we, as universities, will not tolerate any form of cheating. It is not as simple as banning the companies, we need also to targeting advertising of essay writing services, which of course is not easy because a lot of it comes through social media, and how we might develop measures to do this.

But of course, banning essay mills operating in this country will not have any impact on the many essay mills that are operating elsewhere; dealing with them would be extremely challenging. We can however prevent them advertising in the UK and we should try to do this.

But in introducing legislation, there will be potential unintended consequences. There is a risk, for example of unwittingly outlawing what are actually quite legitimate services, such as those providing proof-reading, tutoring, translations and other sorts of academic support, and we need to be very careful we don't disrupt services which are very valuable to our students, and indeed to our colleagues.

To recap, I see legislation as a potential deterrent, not a path to criminalising students. It can't be our only approach to dealing with academic dishonesty, it wouldn't work in isolation, but it would send a pretty strong message.

As I know you've been discussing earlier, and I'm sorry I couldn't be with you, universities have a major responsibility to explain to all their students the importance of academic integrity and the consequences of being found guilty of breaching that integrity. At my own institution, as I'm sure other do too, we start this process at induction and go to great lengths throughout the student's time at university to reinforce those messages about the importance of integrity, how we detect cheating, and most importantly what the consequences of cheating are. We work in partnership with the student union in doing this which is very helpful. The vast majority of students aren't cheats, they want to protect the integrity of their degree and I think probably the student union are our best friends in working within the university to try and protect against cheating.

But we need to look beyond the sector.   I am very worried about the prevalence of essay mills if the reports in the papers are to be believed, and we don't actually know just how great the use of essay mills is.

I've mentioned targeting advertising, is very important. The sector, as I'm sure you will know, has already called on YouTube to stop promoting cheating, particularly via vloggers with a large number of students and young followers. We need to encourage other technology companies to halt promoting essay mills and legislation could help with this.

Ditto with payment firms, we could take action to try and prevent them allowing payments, organisations like PayPal etc. which are used by these essay mills.

I'm very pleased that the UK Government is going to use its forthcoming Education Technology Strategy to help industry tackle some of the key challenges including encouraging tech companies to identify how anti-cheating software can help to tackle the growth of essay mills, and that's clearly a very important avenue of development, but it's going to take time.

And of course the sector itself has developed some very clear guidance as to how universities can help to deal with the problem, I'm sure many of you have read it. It's focused on four main areas, education, training for staff, prevention, which to me is key, detection and regulations and policies. It really does provide all our institutions with a very clear and comprehensive framework for dealing with the issue, from ensuring that all our staff are familiar with the concept of contract cheating to providing very clear regulations to students, promoting that culture of academic integrity and explaining very clearly to our students about what we mean by academic integrity.

You've heard today we can learn lessons from other countries which are ahead of us with this. We've heard from Australia, we've heard just now from Northern Ireland, and we know also that New Zealand and a number of US states are looking at the ways in which they can introduce legislation. We must learn from the experiences of these countries. It's hopeless if we work in isolation. This is an area where countries across the world can come together to try to tackle a problem, which is a problem for all of us. We all have a vested interest in protecting the integrity of the qualifications that we offer.

In my view it's imperative we're not left behind in the UK.   I am concerned that we are spending a long time talking about this and we're not seeing quite as much action as I would like. The world leading reputation of higher education depends absolutely on the integrity of our degrees. We must pay a lot of attention to what's going on elsewhere and learn from those experiences.

What are we doing at my own institution, Brunel University London? We are working to strengthen the training that we provide to our staff and students and looking at ways in which we can reinforce the teaching of academic integrity and ethical working practices right across the curriculum. We all provide students with a great deal of information in induction week, but I would question how much of it is adsorbed because students

have a lot other things to think about at that time. It's a message that we all have to keep reinforcing to our students throughout their time university.

Many of our degree programmes at Brunel are accredited by professional bodies and they provide a stepping stone into a professional career. That will be true for many of you.

The teaching of professional practice is embedded in the curriculum, and of course any student found guilty of malpractice may be banned or limited from practising in the future. That, of course, is a great deterrent to students, but we can't limit that type of thinking simply to degrees that lead to professional qualifications – it must apply to all course.

But as I said, while I think we have to be proactive, we do have to be very careful that we remember that the vast majority of our students are very honest citizens, they have the highest levels of integrity, they would never consider cheating and they take a very dim view of anybody who did. We must be sure that whatever we do to counter dishonesty our students don't feel that we are suspicious of them. I would be very worried if any of my students were going through university thinking that we are constantly watching whether they are cheating or not, because they are very honest citizens. We must ask ourselves how would feel if we felt somebody was watching us the whole time to see if we were cheating.

Educating staff and students is key. But detecting cheating effected by the use of using essay mills and other forms of contract cheating and reducing risk in our assessment processes are big challenges

As the knowledge base grows and information becomes more readily available on the internet, the importance of students regurgitating facts in examinations becomes less and less and less relevant. More important is our students' ability to use that knowledge effectively, to search the internet, to interrogate the information, to critically evaluate the evidence base. We want them to use these types of skills to develop logical evidence-based arguments, to inform debate and to solve problems. These are the skills that our employers are seeking, they are not looking for student who just regurgitate facts. And, of course, exams are not necessarily the best vehicle for testing those types of skills. More and more universities are using project-based approaches, essay based assignments and other types of assessments. We must think very hard about how we can get ahead of the game and use AI, machine learning, etc. to help us develop ways in which we can detect malpractice in quite sophisticated forms of assessment. It would be a retrograde step if the sector felt it had to move backwards to using formal exams for every form of assessment because it was fearful of contract cheating.

At my own institution we are 3 years into a 5 year project in which most of our assessments and examinations will be done online other than those that are not suitable for this medium. This will really open up some very exciting and novel approaches to assessment. The software system we are using is very secure, it screens every piece of course work as it comes in and extraordinarily effective in picking up plagiarism; hence it reduces the burden on staff.

But they system is not yet sufficiently developed to differentiate between different authors, and that's a concern. We understand that the company that owns the software is looking at ways in which machine learning can be incorporated, and with an online record of every single assessment that a student has done within the system from day 1 they join the university, there is a much higher chance of being able to develop machine learning which will be effective. But that is a wish, we certainly aren't there yet.

To conclude, I see essay mills and contract cheating as hugely serious issues and I would like the sector to come together to find effective ways in which we can combat them. I personally believe that some type of legislation could be helpful. I don't think it's a magic bullet, it is something which needs to be used in concert with other approaches, but I do think it would be a helpful deterrent.

Thank you very much.

Gareth Crossman:	Thank you very much indeed Julia. The same applies, if any immediate questions, I can see Cath has got her arm up at the back.
Professor Cath Ellis:	My question is directed to both of you which is why I waited until you'd both spoken. Thank you very much for your comments, I think they are very, very helpful. My own research has shown that 90% of students who admitted to obtaining an assignment… sorry in a survey of 14,000 students, 90% of students who admitted to obtaining an assignment with the intention of submitting it to an institution for assessment, did not pay for it or use a professional service. 60% of those students admitted using a student or a former student. We've heard quite a few times today from various people there's no intent to criminalise students, but students are by far and away the biggest providers of this service to other students, not necessarily for payment.
	So my question is a two part question. Number 1 is, you have both called for legislation, and in fact Deirdre you're heavily involved in developing it. What do we do about the fact that the contract cheating companies that we are all very, very strongly and evidently wanting to see outlawed, are really a tip of a much bigger iceberg, probably 10 to 13% of the supply? And secondly what's the reporting obligation of universities, who all have this central administrative compliance function, if we *do* identify instances of contract cheating that can be identified to a provider? Are you expecting that we then have some kind of reporting obligation and how do you both see that working?
Dr Deirdre Stritch:	So the first part, yes I think our understanding, anecdotally at least, of the Irish context is that the majority of cheating practice, as you've just outlined is committed, or facilitated rather, by other learners and/or family and friends and so on. And the legislation, as I said, doesn't want to criminalise those individuals even though they are technically going to be committing an offence. So I think the devil is going to be in the detail of implementation on this point. We don't yet know, because it's too premature in the legislative process, what sort of reporting requirements and procedures will be in place for providers that identify cheating practice in their institutions, but it is likely, I would think, that we will have a scenario whereby institutions will not be mandatory reporters. I think it is likely therefore that we will not be making formal prosecutions or initiating prosecutions against learners. I would think, and again I'm really conscious that this is all speculative at this stage, in terms of the essay mills themselves, being a smaller part of the overall equation, it's likely that where there are suspicions or allegations of malpractice in that space, that that is where we will be encouraging providers to come forward. But as I was saying previously, the implementation plan nationally, or the tentative plan, is not going to focus exclusively on the legislation, it is one part of a much broader toolkit. And other, possibly more significant tools in that kit will be communication with learners in particular, so that they understand the gravity of what it is they are undertaking if they enter into some sort of cheating arrangement.

The other is in working with providers and other regulatory bodies nationally to address the underlying issues. We are a regulator and the question for us is how can we best assist our providers to address this issue internally, both in terms of teaching and assessment practice, in terms of their own regulatory functions, in terms of how they go about identifying and dealing with and managing allegations of cheating once they emerge etc. So I think we are going to be looking at a much more complex, nuanced, multifaceted approach when it comes to implementation of the legislation.

Professor Julia Buckingham: I don't think I could add very much to that, other than to say that I think if we did have legislation I think we would have to engage very closely in England with the OfS to see how we could work with them to ensure that anything we did was effective.

Gareth Crossman: Thank you very much. I think I will now move on, so any other questions if they could wait until the end. Next, we have three speakers talking about the various approaches to legislation. First up Michael Draper, Professor Michael Draper from Swansea University.

Legislative approaches to contract cheating - evaluating the efficacy of existing fraud legislation and navigating grey areas
Professor Michael Draper, Professor, Hillary Rodham Clinton School of Law and Chair, University Regulations and Student Cases Board, Swansea University

Good afternoon everyone, I don't have PowerPoints, all my prompt notes are on my vest, so if I start undoing my shirt it's not because of the heat, I'm following Thomas' model.

What I would say first of all is that yes I'm a lawyer by background, yes I've got an interest in legislation, but in terms of my day job I'm Dean of Regulations and Student Cases at Swansea University, so like Cath Ellis and other academic colleagues in the room, I see what happens on a day-to-day basis and the human cost to students.

I'm also responsible for inclusivity and then the support within the institution, so I've been heavily engaged with the advanced HE in developing toolkits for directing adult learning, peer mentoring, anything to support students in terms of their learning.

But I also think that the law in this area has a role to play, for all the reasons that have been identified already, public policy, public interest deterrents, you want people who can actually perform medical services competently, we want engineers to build bridges, architects to build proper buildings etc. etc. and the law has always been used, certainly in the criminal sphere, as a deterrent. It's not perfect, people still commit offences, and I don't pretend that having legislation in this area will be a magic bullet or basically a panacea, but it's part of a range of tools that we can use to tackle the industry of essay mills.

Now what I have suggested in various articles, and we already look at the existing law, because we are talking about new legislation, but there already exists legislation in this area in the UK. Cath referred to existing legislation in Australia, we have it within the UK, it's called the Fraud Act 2006. We've also got an Obscene Publications Act 1959, we have common law offences of conspiracy to defraud. Now those offences, conspiracy in particular have already been used in the higher education context, so the genie is out of the bottle. Where we have exam impersonation, there were a couple of high profile cases about 10 years ago at a university up in the North of England, where there were successful prosecutions. So the law has a role to play within institutional work and academic misconduct.

I've got my own particular concerns, however, about the Fraud Act 2006, it's a blunt tool. And when I looked at this a couple of years ago I came to the uncomfortable conclusion that students might well be committing fraud as well as essay mills and that's exactly what I don't want. For all the reasons that have already been played out, I don't want students to be criminalised, I don't want our universities to become crime scenes, I don't want my colleagues actually tied up, their valuable hours, in getting evidence for prosecutions. And so I am concerned at the moment, simply because the law has changed on the test of dishonesty.

I was perhaps a bit relaxed about the 2006 Act until 2017 and the Supreme Court, in *Ivey and Genting Casinos,* changed the test of dishonesty. Basically, the test is now purely objective. So your own subjective moral code, your own… basically I can point to terms and conditions and disclaimers and all the rest of it, therefore not being dishonest, has gone out the window. So I suspect that the 2006 Act may well be a tool that we can potentially use at the moment, but as I said that can incorporate students, they make false representations under Section 2, this is my work, but it's not, they have the intention to make a gain, and that gain may well be academic credit, but for some professions that leads straight to a job, that's financial, so the financial property element to the offence is made out and this makes me rather uncomfortable.

So what I called for in the work that I have done with colleagues, including Professor Philip Newton and the work at the QAA etc. is for a new offence. And the reason why I've done that is because the existing legislation of the Fraud Act, there are evidential issues in bringing prosecutions. The Crown Prosecution Service has to be

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

convinced there's a public interest in pursuing the prosecution, and for whatever reason resources, getting evidence, etc. that may not be possible.

So what I've called for is new legislation specifically targeted at the supply side, not the demand side, not the students, but the supply side, using, in effect, the principle called strict liability. Now that has the advantage of turning the tables in terms the evidential hurdle has to be got over by the Crown Prosecution Service in the sense of it's up to the supplier to prove that what they've done they've done innocently, that they did not know that the student was going to submit that work as their own for academic credit.

So suggesting an offence of strict liability is a principle used elsewhere where there's an issue of public interest, environmental or, for example, subject to defence of due diligence. So if the supplier can demonstrate they've used all necessary steps to determine that this would not be submitted as the student's own work, then no offence has been committed. But the point is, the cost of actually proving that is put on to the supplier, not on to the State, cost in terms of human terms, so that's time and money and the emotional side, is taken away from university staff and students.

So I have been working very closely with the QAA, with Lord Storey on this, and we are hopeful that the Government may actually see a way forward to introducing or supporting a Private Members Bill or time notwithstanding Brexit at some point, that we get legislation in the area.

Julia has already referred to the fact that there is a groundswell of support at higher institution level, 45+ Vice-Chancellors, writing to the Government saying we need this part of a toolkit in which to tackle the issue.

So that's my brief pitch, I was only given 5 minutes, so I'm keeping to my 5 minutes otherwise Gareth will tell me off, but obviously take questions later on, or now if you want me to.

Gareth Crossman:　　　　　　　　　Outstanding, thank you very much indeed Michael. Are there any immediate questions for Michael? Right in which case if we can have Kiran Chauhan to present', who is Chief Operating Officer and Co-Founder of Proofed.

Legislative approaches to contract cheating - evaluating the efficacy of existing fraud legislation and navigating grey areas
Kiran Chauhan, Chief Operating Officer and Co-Founder, Proofed

Hi all, thank you for having me here.   Yes, I am the Co-Founder and COO of Proofed.

What is Proofed? Proofed is a language services company, we have three pillars to our business, we provide proofreading and formatting services, we train proofreaders all over the world to become and take a career in proofreading to become proofreaders. And then we're also building tools to help our proofreaders produce better quality work and we're also in the process of building tools to help people author better documents from the beginning.

Okay, so the focus on the delivery service side of our business, we broadly serve five user groups, students, businesses, researchers, authors and professionals. So to focus on the types of work that we see and the types of work that we believe proofreading is a part of, proofreading is a part of almost every writing process across all disciplines across all industry, you know, an author would never publish a book without it being proofread, typeset, formatted, possibly multiple times.

Businesses use our services to make sure marketing material, reports, RFPs, contracts are all word perfect before they go out to their clients or to the public. Researchers use us for their research papers prior to being submitted to peer review journals and conferences. On the other side of that we actually work directly with conferences and journal publications to make sure that their work is camera ready before it is actually then physically published. Students we work with, we have worked with students and we do work with students from all over the world, but for students, you know, proofreading their dissertation is an integral part of their dissertation academic process. We believe that a dissertation can be proofread for consistency to help someone clarify the arguments and for it to be concise, allowing the marker to focus on the argument at hand and what they're trying to convey in terms of the structure of their work.

But this is where policy for me and for Proofed falls down and let me give you some examples of the good, the bad and the ugly.

An example of good would be Essex University's student policies on proofreading and editing services where they actually show you how you can find a good proofreader, they also instruct you on what types of work should be proofread and what shouldn't be proofread, and what types of students should seek proofreading services.

An example of the bad would be King's College University where we had our brand ambassadors running a campaign at the university with their student union and at the eleventh hour they pulled the plug citing that this is against their university policies and regulation. So we wanted to find out a bit more from the university itself, so we submitted a freedom of information request to find that KCL could not produce a single word or paragraph stating that they have anything for or against proofreading services for their students.

An example of the ugly would be, oh sorry I've got that the wrong way around, that is the ugly, and this is slightly ugly, sorry. An example of the bad would be UCL, so UCL have taken a very extreme other end of the approach where they have provided guidelines that are so strict that say any document that is used, any work that is produced, that is authored using electronic or a human service is completely against their academic regulations, which completely rules out the use of Microsoft Word, Grammarly, Google Docs and other legitimate services that students use to better their work.

So, this kind of brings it to for me I think better university policy across the board is needed, students and universities would benefit from having a single unified policy that can be universally adopted. At Proofed we've already been working on this policy for quite some time now where we've been looking at the guidelines that universities publish and trying to come up with a set of common ground that we and the university share and we would like to publish. It's clear that students receive very mixed signals, well students

and researchers receive signals with regards to what they can and cannot do. So, you know, at Proofed we would like to see whether, you know, our policy is adopted or another wider policy from another governing body, we would definitely welcome that.

In addition to that at Proofed we would like to see the stakeholders, like ourselves, in this space to be vetted against this framework so then we can be satisfied as certified service providers that students know that they can use.

In terms of how I think, well how we think we could, well policy and legislation could be enacted to tackle the bad actors in this space, we've touched on quite a few already. Payment processing, we use Stripe as our payment processor and they have a strict policy and guideline on allowing essay mills or contract cheating services, but we know that PayPal and SafePay and other companies just haven't got that far yet. Hosting providers who actually host these websites should also change their terms of business to follow the same process. And advertising as such is, you know, does have some legislation around advertising, but, you know, Google Search is primarily the space where people are searching for these things. So I know in some places, in some spaces in terms of, for example, streaming television that's already, if you're trying to search for streaming service, Google will show you that this is illegal, you shouldn't be doing this and I just don't see why other service providers can't do the same thing.

So overall I think having a transparent and clear set of policies that all the universities adopt across the UK and globally would be really, really welcome. We would be happy to lead that space and lead that conversation, and we want to be a part of the conversation because I think transparency and collaboration is the only way we're going to get there. So yes and I think this is all entirely achievable, it's in our hands.

Thank you very much.

Kiran Chauhan's slides can be downloaded from the following link:
https://www.westminsterforumprojects.co.uk/forums/slides/Kiran_Chauhan.pdf

Gareth Crossman:	Thank you very much. Are there any immediate questions for Kiran? Yes, two here, I'll take both of them at the same time if we could. I think there's a microphone just appearing, there's one there and one just there.
Hugh Jackson:	From the Society for Editors and Proofreaders. And I just wanted to pick up on that because we are developing a code of practice for our members, our 2,500 members who are dealing with student work and we would really welcome input from the panel and really anyone else on any provisions, procedures that should go into that as I'm working on it at the moment.
Gareth Crossman:	Okay, there are two other questions, I'm conscious of time, so if we can take them altogether and then Kiran, sorry I'm putting quite a bit on you, but if we could kind of lump them together in terms of answer. Just at the front just here and then over on the second row.
	Hi there Kiran, thanks for a good talk.
Jonathan Leake:	I'm Science Editor at the Sunday Times. My question is very simple which is how much does it cost? Because there's going to be an issue as well as an act of cheating that richer students are going to make more use of this service than poorer students, so it could amount to a form of discrimination in terms of income and wealth and availability of money, or parental support. So how much does it cost to do for example a PhD or degree dissertation?

Kiran Chauhan:	So yes.

Gareth Crossman:	Can we actually just, there's a third question there, if I can just… sorry just because we are aware and we have time restrictions.

Dr Robin Crockett:	From the University of Northampton. If I was a student and I sent you my dissertation for proofreading how would your feedback come back to me?

Kiran Chauhan:	Okay, I'll try and address these, I start with this one first. So we proofread everything in tracked changes, we have a clear policy internally of not changing the underlying argument that a student is making. If we feel that we are going to make a change that's going to change what a student is trying to say, we provide a comment. Similarly, with the comments that we do provide, or the changes that we do make they are usually coupled with comments and these comments have links to online blog, our self-help articles where the student can actually learn from their mistakes [transcript gap]. So we try to put it on the student, we don't provide them with a finished article, we provide them with a tracked change copy, the clean copy with comments available where these are the things that they still need to address and it's up to you take this forwards and to finish it before you hand it in. So then we put the emphasis on the student to actually then complete the work themselves.
	In terms of pricing, we charge £15 per thousand words, we know that there are individuals out there who will always undercut us, so we've always been focused on delivering as cheap a service as possible for our students in the UK. We do this purely by having a platform that automates most of the administrative process of uploading a document, processing it and getting it out to a qualified proofreader as well. We also offer a formatting service which is £4 per thousand words, which helps you structure and layout your document so that way you can actually, you know, that you've set your margins properly and then you have the track changes version to actually learn from that in future as well.

Gareth Crossman:	There was a final point. There's a final question.

Kiran Chauhan:	Is there one more question?

Gareth Crossman:	Oh no.

Kiran Chauhan:	That was the final question.

Gareth Crossman:	That's fine, okay, thank you very much. If we could just wait for any further questions until the end because we do need to move on. Thank you very much indeed, Kiran. And finally, Robin Jacobs who is a Barrister at Sinclairslaw.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Legislative approaches to contract cheating - evaluating the efficacy of existing fraud legislation and navigating grey areas
Robin Jacobs, Barrister, Sinclairslaw

Afternoon everyone.

So I work for a law firm which specialises in education law and increasingly we're being approached by students who are in a panic because they've suddenly found themselves accused of academic misconduct, plagiarism and the like, so I've got a slightly different perspective on this.

The pattern that I'm seeing I'm sorry to say is that a lot of these students are being treated extremely unfairly both in terms of the allegations themselves, which are quite often based on nothing more than suspicion and also the processes that get followed which don't really allow students in a lot of cases to defend themselves properly. As far as legislation is concerned if we're going to have legislation I'd like to see it include safeguards to give greater protection to students, particularly international students who pay vast sums of money to be in this country and who will often have, it's no exaggeration, they'll have their lives destroyed because, you know, £20,000, £30,000, £40,000 that they've spent on coming to England to study is gone and they're never going to get it back.

What should the safeguards be? Firstly, I'd like to sort of echo what Kiran was saying, I think it's crazy that there is so much uncertainty as to what plagiarism or academic misconduct actually is. So clearly if you buy an essay from someone else and you pass it off as your own work, yes, I think most of us would agree that is plagiarism, but there are a huge number of grey areas.

So for example, what is the difference between proofreading and cheating, I was surprised to hear it said that if somebody else looked at the work and changed as much as one word then that could be treated as an offence, certainly when I was at university we were encouraged to share our essays and to get feedback on them.

So I think what we need is a universal definition of plagiarism so that students know exactly where they stand, they don't find out what plagiarism is after they've committed it, it's made very, very clear what the boundaries are and the statutory definition which applies everywhere is backed by detailed statutory guidance from the Department for Education which sets out exactly what plagiarism is.

The second thing I'd like to see is greater procedural safeguards when somebody gets accused of plagiarism. I've had students suddenly called to Vivas and grilled on work which they did maybe two or three months earlier, not surprisingly they weren't able to remember very much of it, I can't remember what I had for dinner yesterday, so how are they supposed to remember all these arguments. I've had students with special educational needs and disabilities, something which hasn't really been mentioned at all today, put through procedures which are, you know, directly discriminatory against them. I had a chap with a stammer who was called to a Vivas, he also had an anxiety disorder and these guys were throwing questions at him, his hands started to shake, the guy ended up in A&E. That wasn't a very fair process.

Equally, I'm seeing people called to disciplinary meetings, a short one liner, we've got some concerns about your work can you come and see us, no evidence provided in advance, no detail about what these people are being accused of, completely unfair, very, very difficult, you know, to defend yourself in those circumstances. And I think the point I'd make about that is, you know, you wouldn't treat your employees like that, if it's a member of staff your line manager said, you know, we think you've done something wrong, we're not going to tell you what it is but come to this meeting, you'd be pretty furious about that, so why would you treat your students any differently.

I think the other issue we need to grapple here is kind of the boundaries of academic judgment. Certainly, in a lot of the hearings, the cases I deal with academic judgment it's playing far too great a role in determining whether plagiarism has been committed, ultimately either someone has bought an essay or they haven't,

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

that's a factual question and you need to look at factual evidence. So if someone is able to put forward a coherent explanation about how they've produced a piece of work, or it's like with one of my cases where she was able to explain in detail how she'd produced this and she even had her mother there able to say yes she was in the living room, she had all her books out, yes these books that she's footnoted, I've seen them, we've got them in the house. Now that has to carry at least as much weight if not more than the opinion of someone who's saying well I don't think you wrote this.

The final thing is that, you know, there is also an issue about service delivery, there is increasingly a mismatch between, you know, what is sold to students in terms of the experience they're going to have and what they actually get. And I can think of one case, it was an international student who paid the best part of £20,000 to do a masters in England, she couldn't get a proper meeting with her MA dissertation supervisor. First of all, it was her responsibility to track him down to organise a meeting, I'm sitting there thinking well she's already paid £20,000 that probably ought to be enough, after weeks and weeks he eventually agreed to meet with her. She turned up and it's just him sat with ten students, ten other students in a corridor and she got ten minutes off this guy, so it's hardly any surprise that, you know, she ended up committing academic misconduct, she didn't buy the essay, but she got herself in a bit of mess. So I think that's something else you have to consider that, you know, there are all sorts of reasons why people might get into trouble and quite often the university is complicit in those. Even the school of thought that says if you've got someone supervising a student who commits academic misconduct and if it turns out that the supervisor hasn't supervised them properly, they should be found guilty of academic misconduct as well, it's something worth thinking about.

So in short, you know, I recognise that essay mills, it's an issue that needs to be addressed, but you've also got to treat your students fairly because, you know, without giving too much detail I can tell you I've got clients whose lives have been destroyed, you know, families abroad who've saved, you know, all their lives so that, you know, their child can come to England and it's just over quickly on the basis of, you know, the most flimsy accusations.

Yes, so that's where I stand on it.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Legislative approaches to contract cheating - evaluating the efficacy of existing fraud legislation and navigating grey areas

Questions and comments from the floor with Dr Deirdre Stritch, Provider Approval and Monitoring Manager, QQI Awards, Quality and Qualifications Ireland and Professor Julia Buckingham, Vice-Chancellor and President, Brunel University London

Gareth Crossman:	As Robin is the last speaker if I can move to a panel session now, so if everyone who's spoken could come and take a seat then we can have any more general questions, but initially I can see there are a couple of questions that might be specific for Robin. So there's one just there and one there.
Sarah Thorniley:	From University of London, dealing with our distance learning provision. Just to address the last speaker, the guidance that you speak about has already been produced, it's not legislative yet, but it is produced by the Office of the Independent Adjudicator for Higher Education, it's called the Good Practice Framework for Misconduct, it deals with all forms of student misconduct including academic…
Robin Jacobs:	Yes I'm familiar with the guidance and I've got a copy with me.
Sarah Thorniley:	Excellent. Because that does actually address a number of the concerns that you've raised and gives higher education providers guidance as to what they should do. The burden of proof is on the higher education provider, that's clearly stated within the OIA's guidance and obviously any cases that went through the OIA would be judged against that. Additionally, it does talk about the level of proof, now we are not as higher education providers expected to prove beyond reasonable doubt, some higher education providers do go to that length, but you do not have to, the stated guidance within the OIA is on the balance of probability. And academic judgment has to be involved, academic judgment is subjective, the whole of the higher education institutions rest on academic judgment. We've already had a learned colleague talk today about the marking differences, that it can go from a 50 to an 80 I believe, I'm sorry if I've misquoted, academic judgment is integral to the process and I agree we do need standards across that, but it is still something of weight, that is what you're signing up, that is what you are paying £20,000 to receive. It's not really a question, it's a statement.
Gareth Crossman:	Well just before you answer that I think there was another question that was specifically for Robin.
Michelle Coppinger	There was, yes.
Gareth Crossman:	And if we could keep the questions brief please so that we can get as many in as possible.
Michelle Coppinger:	I'm a Senior Case Handler from the Office of the Independent Adjudicator.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

As many of, you know, that's a free service, it's the ombudsman of last resort for students where they remain dissatisfied about a service or an academic outcome, students are entitled to come to us with their complaints. One of the main things that we see is that and it's come out here is education and that our providers want to do the best for their students, they don't start out trying to put students on a back foot. But thank you, Robin for pointing out disabled students or students with a disability, that's a very important point where providers might need to adopt their procedures accordingly and it's a very difficult path to run. And if I could just point out the point that Kiran was making putting the onus, or putting the onus back on the student where you've contracted services, that might not necessarily be the case and also your duty to that student under the Equality Act wouldn't be being met because they wouldn't necessarily understand the instructions that you're giving them.

Gareth Crossman: Thank you. Robin, do you want to comment on those?

Robin Jacobs: Yes, I mean quite a few points there to pick up on. Yes, of course I'm aware that there is OIA guidance, it's fairly brief, it's also not statutory, the issue with statutory guidance is that you're compelled to follow it.

Sarah Thorniley: It's actually quite long and [transcript gap].

Robin Jacobs: Yes, but the bit specifically on plagiarism, I'm not talking about the entire OIA guidance, yes that's a forest.

Sarah Thorniley: [Transcript gap].

Robin Jacobs: But when you're talking about the definition of plagiarism in particular and what is plagiarism and what isn't, I mean there must be something of a lack of clarity because you're all adopting different definitions, I mean every time I look at a university's policies I've got a different definition of plagiarism. You're telling me that, you know, if I do something at one university, I can have my life destroyed because of it, but at another university it might be alright. And I'm sorry that's the feedback I'm getting on proofreading, there is a real lack of clarity about what is and is not permitted. And, you know, you talk about legal certainty, knowing what your position is what you can and can't do in advance it needs to be spelt out very, very clearly, not just to staff but to students as well. Because I think one of the issues is this doesn't get communicated clearly enough, you get a short course at the beginning of a degree, you know, where there's so much going on and, you know, by the way if you suffer from any sort of processing disorder or dyspraxia, or any kind of anxiety very, very difficult to settle into the course. These principles, they need to be bolt on so that if you're delivering a lecture it's like well we've talked about these different ideas how would we reference them so that you're preventing people from falling into the trap of getting pulled up for what is just basically quite poor referencing, which I see a lot as well, you know, people hauled before academic misconduct panels all they've really done is just haven't written a very good essay, or they didn't quite manage to finish it before their deadline. You know, I mean you've got to trust me when

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

I say that I see the human side of this, no but I do, you know, I've got people coming into my office, I've got girls, you know, international students in tears because they've put everything into this, tens of thousands of pounds, you know, which you guys are charging them and then they come here and you treat them like criminals and I've seen it and it's not good enough.

If two academics can mark the same piece of work and award such radically different grades (50 and 80) this shows what an unsteady barometer academic judgement is. Where all is at stake is the grade for a single paper, it's possible to live with such subjectivity - just about - but where you talking about allegations that can ruin a student's career, such arbitrariness is totally unacceptable.

Gareth Crossman:	Okay. So, are there any questions for the panel as a whole? Yes, one at the front here.
Jonathan Leake:	I'd just like to repeat my earlier question but aimed more at Michael and Julia, which is what do you think of the fact that it's sort of a service that's going to be more open to students with access to money and how that plays out?
Professor Michael Draper:	Well at the end of the day these services cost money so, you know, some students will calculate how many credits do I need to get a certain degree classification and maybe they'll calculate just how much money they need to spend to actually get the academic credits for a particular outcome on the degree. At the end of the day however, these services do not cost a lot of money, we've already identified the cost per thousand words is around £10/£20. So I take the point about the differential between people's access to money, however I'm not certain that money is the factor at play here simply because of the cost of these services.
Jonathan Leake:	Just to add to that, my son is just taking his finals and he's been three or four years in education, he would regard £200 or £300 for proofreading the dissertation quite seriously, so I don't agree with you on that. But I'd be very, I mean essentially this is more about evidence, I mean if you've got some students that are using money to maybe have every piece of work proofread that's going to give an unfair advantage is it not?
Professor Michael Draper:	Well it depends upon the definition of proofreading within the institution, whether that is actually being complied with because legitimate proofreading services do have a role to play, we have a proofreading policy at our institution, so we recognise that. But then again there is a boundary beyond which it is no longer proofreading because you've changed the context and nuance of the piece of work in which it's no longer the student's own work and doesn't reflect the student's own interpretation, analysis or evaluation.
Jonathan Leake:	Now that's a different point, I'm just asking about whether you're allowing the system that allows people who are better off a much better chance of a better result.

Professor Michael Draper:	Well I suppose there's another argument as to why we should actually take action to prevent these services in the first place.
Kiran Chauhan:	Can I add to that? Sorry.
Professor Julia Buckingham	Yes, I mean I think there are many situations in which students who have access to large amounts of money are advantaged over those who don't, not least the lack of maintenance grants because there are many students who are having to do paid work in order to pay their rent and of course they are disadvantaged because they haven't got the time to do their academic work. So I think that is a difficult argument, I take your point, but for me the whole thing has to be about prevention and I would really, really like to see a deterrent which stops these companies operating, that's where my heart comes from. I want to do everything I can to support students to make sure that students in my institution are treated as equally as possible, but I can't do anything about these organisations out there and students using them. I can educate my students, but I can't stop those companies.
Jonathan Leake:	If you allow the proofreading you're allowing greater inequality than already exists, you can't around it really, if we're allowing it then it gives people an advantage.
Professor Michael Draper:	As I say, it depends upon your definition of proofreading, universities don't allow proofreading services which change submission of work, we allow proofreading which is about grammar and spelling.
Professor Julia Buckingham:	Yes and there's spell check on Microsoft.
Gareth Crossman:	Kiran, I think you wanted to add something didn't you?
Kiran Chauhan:	Yes, so there's a few things to that to add, you know, universities do have departments or services within them that help these students to better their own work. We had that example at Nottingham Trent University that has that service that's for free. On the other extreme of that, you know, we have LSE which is, you know, highly geared towards international students doing massive dissertations, they have a paid for service internally with the university, which is unregulated, you know, you don't know what you're going to get from the people that are supplying that service. Additionally, some universities have volunteer programmes where student volunteers help students, other students who are disadvantaged who don't have the same skill sets to deliver these services, but then there's no qualification of these people that are taking on to say that this person yes has met proofreading for the student, it helps the student with their argument or, you know, sorry, with their structure, or with what they're trying to say clearly as opposed to someone offering an editing service within the university as a volunteer accidentally, so without that policy within the university that kind of falls apart.
	But then we also, you know, service students with dyslexia as well who do have funding from the Government to pay for such services and we discount that for them as well. So yes, we try and, there's

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

definitely scope for, you know, something centralised that does clear the boundary of what is proofreading.

But the final point is that when you start getting towards higher education towards publications, stuff in publication is actively encouraged to be paid for to be edited or proofread, beyond proofreading towards editing so you know. And that funding sometimes doesn't necessarily come from the student, it may come from their sponsor in terms of if they're doing academic research at a higher level, or it may come from the university itself because they want to see that their work has been published. So there are lots of different layers to it really, I don't think we're going to get, I think the first step is to have a unified policy to allow it and to try for us and other services to be policed against that framework and for people to have, you know, as low price as possible, which is what we try to do.

Gareth Crossman:	Thank you very much. I'd like to give another opportunity for questions if they can be short, I'm also conscious we're running over a bit on time, so if there are any further questions if they could be quite succinct.
Martin Seviour:	Nottingham Trent University.

Julia, I'd just like to say, or ask you if you agree that part of the solution might be to give teachers, like myself and my team, more contact time particularly with vulnerable students because the essay mills there's a lot of evidence to show that they prey on vulnerable students, international students being one category within that vulnerable label. If we had more contact time, more time right from the start to teach them the skills, to give them the skills they need, that's the real deterrent. I think for me that's the real solution and there's a lot of evidence again in universities that that contact time is being shut down, units like my own in other universities are under threat, they're having their resource reduced, so less academic literacy training rather than more.

Professor Julia Buckingham: Yes, I have a lot of sympathy with what you are saying. Certainly, in my own institution we are trying to move towards contact time which is much more interactive with the students moving away from more traditional type of lecture-based teaching where we have people sitting in rows and you're talking at them. And I think university is now very different from what I experienced as a young student. It's a very big impersonal environment and I think the more that we can do to get to know our students. There's a very big role for personal tutors talking to their students, educating their students and recognising that for many students plagiarism is something that they've never come across in their life before particularly with international students and we have to help and educate them. And I think we as a sector have a responsibility to do that. So I'm very sympathetic to what you're saying, resources are always a big, big issue and it's important that our teaching and the education we provide for our students is properly funded in my view.

Gareth Crossman: Thank you very much. Can we have a round of applause for all the panel members, please?

Thank you, I think I am supposed to do a presentation myself now.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Priorities for restricting contract cheating - the role of a UK Centre for Academic Integrity
Gareth Crossman, Head of Policy and Public Affairs, QAA

It's a combination of the Chair letting things horribly overrun with most of the things that I've said already been covered in other presentations, working perfectly together which means that I will skip over quite a few slides because I'm not going to re-tread old ground.

So if I can work out which way to hold this.

So this is just going to be a run through about some of the work that QAA has been doing in relation to academic integrity and some thoughts about what might happen in the future. Some quotes there, that's Thomas's I think that's pretty much the benchmark definition of contract cheating, certainly one that I think has stood the test of time. I think the quote there from the bottom, from Anthony McClaren from TEQSA is very pertinent because I think certainly in the time that I've been in higher education I've felt that there's been a bit of big shift insofar as the sector acknowledging, and events like this showing that the sector is acknowledging that this is an issue that isn't then over there, it's an issue that affects all of us.

Some of the common manifestations, again I won't run through these in any great detail. We haven't talked about some of these, we haven't talked about fake certification, very briefly work of HECSU Prospects using the Higher Education Data Check. We haven't really talked about admissions frauds in any great detail.

So one of the things that we are trying to do is not trying to look at essay mills, but at academic integrity in the round, and anything that is a threat to academic integrity, however most of the work that we have done has involved the use of essay mills. Now again this is ground that we've covered in some detail, we're often asked these sorts of questions, how many students are cheating. Fortunately, Phil Newton isn't here because he hates this slide. I'm going to skip over it very quickly. Obviously that figure is debatable, but it shows that this is an area of media, there can be sensational headlines, it's an area of increasing media interest. It's an issue that has put the sector under pressure.

So QAA's role. Well QAA is responsible for quality and standards in higher education in the UK. We have a role under the UK Quality Code for Higher Education in relation to expertise, assessment and classification, and so Lord Storey, Mike Storey earlier on talked about how he got in touch with us to talk about academic integrity and in 2017 we were asked by the Government to lead sector's efforts against contract cheating and essay mills through the publication of guidance. This has been referred to a number of times today. I'm assuming, possibly a bit optimistically, but I'm assuming that people know about this. If you don't it's a free download, available from the QAA website and the intention is, we've heard this several times, there's no magic bullet approach, there's no magic solution, and so what this guidance tries to do is provide a toolkit for institutions for all the different steps they could take, and I think some of the presentations we've heard today show how the detail, some of the quite simple steps to take, can be put into effect. So covering education for staff and students, covering prevention, things we've talked about today, including blocking essay mills sites. Check points during assessment so that students can't do the work at the very last minute, get it done by an essay mill. Looking at the methodology of assessment criteria, some of the things we talked about in relation to prevention. Obviously, we've heard about Turnitin software and the new authorship led software. Some of the rather innovative things that we've heard about today.

When I do this I sometimes go briefly over the last bullet and briefly go over regulations and policy to make sure that you do them properly. Well yes, and to make sure that students are treated fairly as well. So thank you Robin because I think if I do this again I will make sure I will place more emphasis on that final point.

This has been mentioned earlier as well. We went to the ASA to complain about… taking a complaint about UK Essays. We talked about it earlier. What I would say is that yes UK Essays have changed what's on their website. Does it feel that much different? I will let you think about that.

Some of the other things we've been doing, I mean we've been thinking about this, you know, it's a multifaceted issue. These companies exist to make money, that's the reason, that's their raison d'être. So if we look at their marketing, try and target their marketing, will that impact on them, will it create this hostile environment for them where it makes it more difficult for them to make a profit.

So we wrote to YouTube, PayPal, Google and other companies, and said you're taking paid for advertising from people who are making money out of cheating, please stop. And we got immediate responses from YouTube and from Google, if you look on Google now you won't see paid for advertising. Of course, it's very difficult to do anything about organic searches. YouTube have said they've removed Edubirdie adverts, I won't go into the detail about what Edubirdie were doing, but invariably new ones will crop up.

PayPal, following… we spoke to the DfE and for some reason the Minister for Education seemed to be more effective in getting a response from PayPal than we were, but PayPal have now promised to block essay mill clients. Again, this won't solve things but it makes it more difficult for them, particularly if to give your credit card details as the other option, for some reason students might not be too keen on having to give their credit card details. So some of the considerations there.

I'm just going to mention the one at the bottom, we haven't spoken about this much today, it has been mentioned. This is the thing we are hearing about more and more is blackmail. At our annual conference last week, we had a couple of sessions about academic integrity and this is the thing that's coming through, students increasingly are being blackmailed.

This has been mentioned a couple of times, Academic Integrity Advisory Group, we basically… you know, we wanted to pull together experts, there are several of them in this room today, to look at how we, as a sector, approach this issue. I'm not going to talk about legislative action because that's been talked about. We're looking at updating the guidance that we've referred to, to ask institutions is this working for you, how can it be improved, how should we update it? Are students aware of it? Are your staff aware of it? Looking at creation of academic integrity charter, a sector wide commitment to protecting academic integrity.

Now if you look at the title of this presentation, it was moving towards the UK Centre for Academic Integrity, and really, I mean, ourselves, most of the people who have spoken, there is no doubt there is significant sector commitment to taking this, everyone in this room to taking this seriously as an issue. What we do not have in this country is a single dedicated resource which takes a holistic view at this issue not just looking at research, looking about campaign work, looking about individual institutional support, looking at this from an international perspective. So, as a couple times has been mentioned, 45 Vice-Chancellors and sector leaders from across the UK wrote to the Government last year saying, you know supporting the idea of setting up a UK Centre for Academic Integrity, still having discussions.

The issue of course, as in anything in life, is how these things are funded. So this is an on-going thing, we believe it's necessary, but from QAA's perspective it is and will continue to be an organisational priority as we move, as many of you know, we're moving from being in England, we're moving from being an organisation where you have to be a member if you are funded by HEFCE to one with voluntary membership, we are telling people who want to be members, this will continue to be an organisational priority.

So that was a very whistle stop tour to try and claw back some time. I notice that there is… I was going to think… I'm happy to take any questions, but also I think as well any questions that haven't been asked to any of the panel members at all please do, and if they want to take individually.

So thank you very much.

Gareth Crossman's slides can be downloaded from the following link:
https://www.westminsterforumprojects.co.uk/forums/slides/Gareth_Crossman.pdf

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Priorities for restricting contract cheating - the role of a UK Centre for Academic Integrity
Questions and comments from the floor

Gareth Crossman:	So any questions. That's fine, fine… well. Yes.
Jonathan Leake:	So would this cover research, academic researchers who, for example, misuse research funds.
Gareth Crossman:	Sorry, when you say this, what do you mean by this.
Jonathan Leake:	Your Centre for Academic Integrity.
Gareth Crossman:	Well it doesn't exist, but…
Jonathan Leake:	No, but you see the point.
Gareth Crossman:	But yes, I mean it is… the idea is to take a holistic view at all forms of malpractice in higher education. Now of course as anything you have to prioritise, you have to decide what you want to focus on is. I mean academic integrity itself is a very broad term, you know, as an organisation we've been dealing with some of the issues recently around grade inflation and does that fall within the realm of academic integrity? Arguably it does, anything that is a threat to UK higher education. So I mean, yes potentially anything that comes under the remit of academic integrity is, but I think what we were envisaging is something that focuses very much on some of the areas that I identified at the start.
Bee Sen-Gupta:	From GSM London. Having spoken to colleagues in North America, and I believe based on some of the guidance that was sent in the UK from the Department for Education, there's a suggestion that we should consider the use of honour codes within our institutions and I wondered how, in the UK context, that might differ from what many of us might have, which is the student code of conduct which then links and dovetails with other policies around disciplinary and so forth. Is there anyone, Gareth either yourself or anyone else in the audience, who could say something about their experience and how that might work.
Gareth Crossman:	Well my instinct is that an honour code as an alternative to a plagiarism software is not going to prove to be particularly effective. I don't know, I wonder if anyone else actually has any comment about honour codes, but they don't strike me… ah.
Professor Cath Ellis:	Sonia Saddiqui is a researcher who has done some work on this. My personal opinion is that they are a cause of one of the reasons why the US is so far behind the UK and Australia in this particular problem because they give a false sense of security and complacency that somehow this is blocking the students from contract cheating. It's not, and there has been some quite comprehensive research that shows some of the biggest problems to do with academic misconduct are actually in the universities that rely on an honour code.
Gareth Crossman:	Okay. Are there any other questions?

Session Chair's and Westminster Higher Education Forum closing remarks
Gareth Crossman, Head of Policy and Public Affairs, QAA

If not then only a few minutes late we can come to an end, I think you want to say any final words.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Westminster Higher Education Forum closing remarks
Helen Crocker, Senior Researcher

Thank you Gareth.

I would just like to thank you all for coming on behalf of Westminster Higher Education Forum.

I would also like to ask if you could please take a few minutes to fill in the delegate feedback forms that are in your packs, it helps us with the quality of our events, and if you could please leave them with us on your way out, along with your badges and we can recycle them.

I would just finally like to thank all the speakers from this morning, and thank you Gareth for Chairing the second session so well.

Thank you, and I wish you all a lovely afternoon.

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

List of Delegates Registered for Seminar

Philippa	Armitage	Academic Practice Officer	University of Bedfordshire
Andrew	Berrow	Head of Learning Operations	Institute and Faculty of Actuaries
Sarah	Boby	Senior Lecturer	De Montfort University
Dee	Bozacigurbuz	Academic Misconduct Officer	University of East London
Adrienne	Briggs	Policy Lead (HE Quality, Essay Mills)	Department for Education
Professor Alison	Britton	Head of Department, Department of Economics and Law	Glasgow Caledonian University
Professor Julia	Buckingham	Vice-Chancellor and President	Brunel University London
Stephen	Bunbury	Senior Lecturer	University of Westminster
Kiran	Chauhan	Chief Operating Officer and Co-Founder	Proofed
Trevor	Colling	Director of Postgraduate Taught Programmes, School of Business	University of Leicester
Michele	Coppinger	Senior Case Handler	Office of the Independent Adjudicator
Dr Patricia	Covarrubia	Senior Lecturer	University of Buckingham
Dr Robin	Crockett	UoN's Institutional Lead on Contract-Cheating	University of Northampton
Gareth	Crossman	Head of Policy and Public Affairs	QAA
Laura	Daugherty	Senior Quality administrator Student Complaints Appeals and Assessment	University of Arts London
Daniel	Dennehy	Chief Operations Officer	UK Essays
Debbie	Donnet	Assistant Head of Governance	Glasgow Caledonian University
Sam	Douthwaite	Communications Manager	UK Essays
Carly	Dove	Head of Marketing, EMEA	Turnitin
Chris	Down	Investigator	University of Cambridge
Professor Michael	Draper	Professor, Hillary Rodham Clinton School of Law and Chair, University Regulations and Student Cases Board	Swansea University
Jenny	Dye	Director - Quality, Learning and Teaching	University of the West of England
Dr Martin	Elliott-White	Director of Academic Development	University of Lincoln
Professor Cath	Ellis	Associate Dean (Education)	University of New South Wales
Jessica	Evans	HEA Senior Fellow	The Open University
Emma	Flisher	Head of Student Affairs, Academic Services	Brunel University London
Dr Celina	Garza	Academic Honesty Manager	International Baccalaureate Organization

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Professor Roger	Gibbard	Teaching and Learning Dean	University of Reading
Dr Irene	Glendinning	Academic Manager for Student Experience, Faculty of Engineering, Environment and Computing	Coventry University
Stephen	Gow	Academic Integrity Coordinator	University of York
Tammy	Gray	Senior Policy Advisor	Crown Prosecution Service
Adam	Harvey	Co-Founder	Proofed
Dr Zhang	He	Senior Lecturer in Economics, Business School	Teesside University
Marian	Hilditch	Deputy Academic Registrar	University of Bradford
Marian	Hilditch	Deputy Academic Registrar	University of Bradford
Claire	Hill	Learning Operations Manager	Institute and Faculty of Actuaries
Yukari	Iguchi	Academic Lead	University of Derby
Hugh	Jackson	Standards Director	Society for Editors and Proofreaders
Robin	Jacobs	Barrister	Sinclairslaw
Dr David	Jenkins-Handy	ICA Director of Quality Assurance, Accreditations and Audit	International Compliance Association
Laura	Johnstone	Education Governance Officer	Newcastle University
Dr Jeff	Jones	Associate Professor	WMG - University of Warwick
Arsalan	Khawaja	Lecturer	University of Wolverhampton
Nick	Kho	Research Manager	NEBOSH
Dom	Kingaby	Policy Team Leader	Department for Education
Anna	Krajewska	Course Leader, Foundation Year	Bloomsbury Institute
Dr Thomas	Lancaster	Senior Teaching Fellow (Student Support)	Imperial College London
Sally	Lansdell	Professional Support Lawyer	Mills & Reeve
Jonathan	Leake	Science & Environment Editor	The Sunday Times
Dr Jill	LeBihan	Head of Student Engagement	Sheffield Hallam University
Miles	Lockwood	Director of Complaints and Investigations	Advertising Standards Authority
Dr Steven	Logie	Director of School Support Service & Academic Registrar	Edinburgh Napier University
Bill	Loller	Vice President, Product Management	Turnitin
Alison	MacKenzie	Dean of Learning services	Edge Hill University
Dr Charlotte	Matheson	Academic Policy Officer	University of Edinburgh
Dr Rachel	Maxwell	Head of Learning and Teaching Development	University of Northampton

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Prince	McCollins	Assessor and Tutor	Uganda Community Relief Association
Fiona	McIntyre	Higher Education Correspondent	Research Fortnight
Dr Alan	McKenna	Law Lecturer	University of Kent
Anna	McKie	Reporter	Times Higher Education
Professor Dominic	Medway	Deputy Pro-Vice-Chancellor, Faculty of Business and Law	Manchester Metropolitan University
Huzaifa	Mohamedali	Head of Quality Assurance and Enhancement, Centre for Learning Innovation and Quality (CLIQ)	Kaplan International Pathways
Samantha	Morton	Registry Operations Manager (Appeals & Unfair Practice)	Cardiff Metropolitan University
Georgia	Moustaka	Quality & Standards Officer	City, University of London
Sarah	Nansukusa	Director	Uganda Community Relief Association
Noreen	Naughton	Senior Academic Quality Manager	Royal Holloway, University of London
Dr Elizabeth	Newton	Senior Lecturer and Academic Integrity Coordinator	London South Bank University
Dr Laura	Osborne	Deputy HE Programme Manager	The Learning Institute
Suzanne	Owen	Product Marketing Manager, Authorship Investigate	Turnitin
Professor Pam	Parker	Deputy Director of LEaD	City, University of London
Dr Edd	Pitt	Senior Lecturer HE & Academic Practice	University of Kent
Yasmin	Pitter	Deputy Director, Higher Education Qualifications	Pearson Education
Jane	Popoola	SEO Policy Officer	Department for Education
Dr Deborah	Rafalin	Chair of Academic Misconduct, School of Arts and Social Sciences and Learning Development Fellow, Department of Learning Enhancement and Development Directorate	City, University of London
Dr Dawn	Reilly	Principal Lecturer, Department of Accounting and Finance	University of Greenwich
Catherine	Rendell	Deputy Director AQA	University of Hertfordshire
Dr Louise	Revell	Associate Professor in Roman Studies	University of Southampton
Mark	Ricksen	Principal Product Manager, Authorship Investigate	Turnitin
Dr Amy	Rowe	Assistant Director for Academic Affairs	NYU London
Gill	Rowell	Education Manager	Turnitin
Dr Stephanie	Sandland	Senior Lecturer	University of East London
Valerie	Schreiner	Chief Product Officer	Turnitin
Bee	Sen Gupta	Director of Library & Learning Resources	GSM London
Dr Mark	Sergeant	Lecturer	Nottingham Trent University

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Martin	Seviour	Acting Head of Department	Nottingham Trent University
Philomena	Shaughnessy	Associate Dean AQA	University of Hertfordshire
Dr Phia	Steyn	Faculty Chief Examiner	University of Stirling
Lord	Storey	Liberal Democrat Lords Spokesperson (Education)	House of Lords
Dr Deirdre	Stritch	Provider Approval and Monitoring Manager	QQI Awards, Quality and Qualifications Ireland
Cindy	Stubbs	Student Conduct Officer	Heriot Watt University
Sarah	Thorniley	Senior Manager: Academic Integrity and Student Conduct	University of London Worldwide
Camilla	Turner	Education Editor	The Telegraph
Dr Nina	van Gessel	Senior Administrative Officer (Quality)	University of Roehampton
Dalton	Vincent	Deputy Director of Studies	UK College of Business & Computing
Dr Sigrun	Wagner	Senior Lecturer in International Business and Sustainability	Royal Holloway, University of London
Professor Beverly	Wagner	Professor of Marketing	University of Strathclyde
Dr Walter	Wehrmeyer	Reader	University of Surrey
Jamie	Whitehead	Senior Account Manager	Turnitin
Andrea	Wilcox	Assessment and Awards Manager	Swansea University
Abigail	Williams	Registry Advisor (Regulations)	Cardiff Metropolitan University
Dr Juliette	Wilson	Senior Lecturer in Marketing	University of Strathclyde

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Contributor Biographies

Professor Julia Buckingham, Vice-Chancellor and President, Brunel University London

Julia Buckingham read Zoology at the University of Sheffield and, after a short spell in the pharmaceutical industry, moved to London to study for a PhD in Pharmacology at the University of London and to pursue an academic career. She was awarded a DSc and appointed to the Chair of Pharmacology at Charing Cross and Westminster Medical School in 1987 where she became Pre-clinical Dean in 1992. She joined Imperial College London in 1997, contributing to the establishment of the new Faculty of Medicine and held the roles of College Dean for non-clinical Medicine, Head of the Department of Neuroscience and Mental Health, Head of the Centre for Integrative Mammalian Physiology and Pharmacology and Pro-Rector (Education and Academic Affairs). In 2012 she was appointed Vice-Chancellor and President of Brunel University London. Throughout her career Julia has combined research and education with supporting the broader aspects of academic life through work with the research councils, medical charities and learned societies. She has published widely in her field, served on numerous national and international review panels and received a number of prestigious awards and honours for her work; she awarded a CBE in 2018 for services to Biology and Education. Former roles include President of the British Pharmacological Society, President of the Society for Endocrinology, member of the Sykes Commission, Editor of the Journal of Neuroendocrinology, Chairman of BioScientifica Ltd, a Trustee of the Royal Institution and the Royal Society of Biology and a Governor of St Mary's Calne. She is currently President-elect and Treasurer of Universities UK, a Director of Imperial College Health Partners and of the National Centre for Universities and Business, a member of the All-Party Parliamentary University Group Council and Chair of The Concordat Strategy Group, supporting the career development of researchers, and the Athena SWAN Review Steering Group.

Kiran Chauhan, Chief Operating Officer and Co-Founder, Proofed

Kiran is a technology entrepreneur who started Proofed in 2010 to provide high-quality proofreading and editing services in easy-to-consume ways. Lifelong learning is central to the Proofed philosophy, striving not only to help customers improve their work but also to educate them about alterations—enabling them to develop their English and become better writers. Kiran's other ventures also promote transparency using technology as the means of levelling the playing field, spanning sectors including recruitment and construction management.

Gareth Crossman, Head of Policy and Public Affairs, QAA

Gareth joined QAA in October 2016. He is responsible for QAA's policy, public affairs and media relations work. He leads QAA's work in protecting and promoting academic integrity. Gareth originally practised as a solicitor specialising in criminal defence advocacy. He has also worked as a journalist. In 2002 he was appointed as the first Policy Director at Liberty, the UK's leading human rights and civil liberties campaigning organisation. He specialised in developing organisational policy relating to counter-terrorism, privacy and surveillance, criminal justice, extradition and anti-social behaviour. Gareth left Liberty in 2009 to join TACT, the UK's largest fostering and adoption children's charity as the Executive Director of Policy, Communications and Fundraising. Gareth's most recent role was as Director of OCD Action, a mental health charity providing services and support for people affected by Obsessive Compulsive Disorder.

Daniel Dennehy, Chief Operations Officer, UK Essays

Daniel Dennehy is the Chief Operating Officer for All Answers Ltd. He is responsible for the day to day operations of the company. This encompasses all business activity top down, ensuring that the company achieves its goals and objectives through excellent care, quality and service. He not only assists in the strategic planning of the business, but also implements the strategies too. Having worked at All Answers for over a decade, Daniel has an excellent understanding of the 'model answer' market. He understands and appreciates the apprehension of the services, but does believe that when used and understood correctly, there is role for model answers within the education sector.

Professor Michael Draper, Professor, Hillary Rodham Clinton School of Law and Chair, University Regulations and Student Cases Board, Swansea University

Michael is Dean of Regulations and Student Cases at Swansea University and Director of the Swansea Academy of Inclusivity and Learner success. As a Principal Fellow of the Higher Education Academy Michael works closely with Advance HE in the support of student learning having developed toolkits for student peer mentoring and student independent learning. Michael is a solicitor of the senior courts of England and Wales and a member of three national Law Society Committees. He is a member of the QAA advisory group on academic integrity and a consultant with the Council of Europe on Ethics Transparency and Integrity in Education.

Professor Cath Ellis, Associate Dean (Education), University of New South Wales

Associate Professor Cath Ellis is the Associate Dean (Education) in the Faculty of Arts and Social Sciences at UNSW, Sydney. Previously she worked at the University of Huddersfield in West Yorkshire, UK and the University of Wollongong in Australia. While her background is in Australian and Postcolonial Literature, her current research is in the area of academic integrity with a particular interest in contract cheating.

Robin Jacobs, Barrister, Sinclairslaw

Robin began his career at Hardwicke Chambers, where he was a member of the Education Team. From 2013, he worked at Buckinghamshire County Council on a consultancy basis, advising the council and local schools/academies on a very wide variety of matters. Robin has extensive experience of many different aspects of Education Law including SEN; school admissions; school exclusions; discrimination; school attendance; home-to-school transport and higher education. He has appeared before most of the major courts and tribunals including SENDIST, the Schools Adjudicator, the High Court and the Court of Appeal. Whilst in chambers, Robin regularly advised and represented university students. Since joining Sinclairslaw, he has returned to this area and now focusses predominantly on higher education matters. Robin is able to assist students with: internal complaints/appeals; complaints to the Office of the Independent Adjudicator (the OIA); and court proceedings (judicial review, breach of contract, educational negligence etc.). Robin recently completed post-graduate studies in art history and therefore has a good understanding of the issues facing university students. Robin's areas of expertise include: academic appeals; allegations of plagiarism/academic misconduct; discrimination/failure to make reasonable adjustments; fitness to practice proceedings; and issues concerning quality of tuition/supervision. Robin is the editor of Education Law Monitor, a post he has held for several years. When not at work, Robin is often to be found in a gallery or cheering on Norwich City FC.

Dr Thomas Lancaster, Senior Teaching Fellow (Student Support), Imperial College London

Dr Thomas Lancaster is a Senior Teaching Fellow in the Department of Computing at Imperial College London, with responsibility for student support. A graduate from the University of Oxford, Thomas has worked widely across higher education institutions in the UK. He has been researching academic integrity since 2000 and coined the term contract cheating with now retired colleague Robert Clarke. Thomas regularly delivers keynote speeches, workshops and seminars on academic integrity and provides expert opinion for the international media. He is a member of the QAA's academic integrity expert advisory group and the JCQ's independent commission into assessment malpractice.

Miles Lockwood, Director of Complaints and Investigations, Advertising Standards Authority

Miles joined the ASA in September 2010 and is responsible for leading the complaints and investigations teams, dealing with around 30,000 complaints per year and delivering strategic regulatory projects. Miles's background is in legal practice and legal regulation. Qualifying as a solicitor in 1998, he worked in commercial legal practice, specialising in general litigation and dispute resolution matters.

Bill Loller, Vice President, Product Management, Turnitin

Bill Loller is the Vice President of Product Management for Turnitin, the leader in helping students write with integrity. Previously, Bill was the Chief Product Officer of Jobvite and the product management leader for the IBM Commerce Customer Analytics business through the acquisition of Tealeaf Technology. Prior to joining Tealeaf Bill held senior product positions in established and start-up companies alike including co-founding Zumigo, a leader in mobile location services. Bill was also the Director of Product Management at VeriSign's

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Digital Media Group, where he was responsible for managing multiple product lines with a $50M revenue run rate. Earlier in his career Bill served as the Director of Product Management at Pixo, the developer of the iPod OS (acquired by Apple.) In addition to over 19 years of experience in product management Bill spent 4 years as a Gartner Group/G2R analyst focusing on trends in the broader technology industry. Bill holds a B.S. in Economics from the University of Pennsylvania's Wharton School.

Dr Rachel Maxwell, Head of Learning and Teaching Development, University of Northampton
Dr Rachel Maxwell is Head of Learning and Teaching Development at the University of Northampton where she leads a number of research and development projects supporting the student experience. These include Enhancing Student Success, which supports first year undergraduates and embeds Northampton's student-centred Framework of Graduate Attributes across our curricula. Her portfolio also includes the development of 21st century assessment and feedback practices - including the digitisation of examinations, promoting academic integrity and supporting staff to adopt innovative assessment and feedback practices. Her work involves the appropriate use of technology within and outside the classroom as key component of Northampton's active blended learning pedagogy.

Anna McKie, Reporter, Times Higher Education
Anna McKie is a Reporter for Times Higher Education. She covers teaching, learning and student issues, as well as higher education in Africa and the Middle East. Previously she was the higher education reporter for Research Fortnight and news editor of the Brixton Bugle. She has a BA in contemporary history and an MA in modern European history from the University of Sussex.

Professor Dominic Medway, Deputy Pro-Vice-Chancellor, Faculty of Business and Law, Manchester Metropolitan University
Professor Dominic Medway is Deputy Pro-Vice-Chancellor of the Faculty of Business and Law at Manchester Metropolitan University and a Co-Director of the Institute of Place Management (http://www.placemanagement.org). He has recently undertaken research on contract cheating in HE, examining the reassurance cues online essay mills use to attract students, as well as the quality of the 'products' they deliver.

Dr Deborah Rafalin, Chair of Academic Misconduct, School of Arts and Social Sciences and Learning Development Fellow, Learning Enhancement and Development Directorate, City, University of London
Dr Deborah Rafalin is a Learning Development Fellow for City, University of London's Learning Enhancement and Development Directorate, working to enhance the academic journey of students through supporting academics in the development of innovative assessment and feedback strategies. As Chair of Academic Misconduct for the School of Arts and Social Sciences, Deborah also has expert knowledge of the complex relationship between academic integrity, academic misconduct and assessment design, which she brings to this role. Additionally, Deborah is a practising registered psychologist who has worked in governance and strategic leadership across statutory and third sectors. Deborah's work in HE is shaped by her experience and understanding of individuals and complex organisations.

Lord Storey, Liberal Democrat Lords Spokesperson (Education)
Lives in Childwall - Liverpool with his family and enjoys regularly walking Ziggy the dog in Childwall Woods. A Primary School Teacher for 40 years and a Headteacher in Huyton and Halewood Schools for 24 years. A Liverpool City Councillor and former Chair of Education, Deputy Leader and Leader of the Council. Led the Liberal Democrats to win the 1998 Local Elections and then was Leader from 1998 to 2005 and had a Lib Dem Group of 73 Councillors out of 90 Councillors keeping them together was one of his greatest achievements! As Leader of the Council he led the successful and successful bid for Liverpool to become European Capital of Culture, other successes included Liverpool One, Arena and Convention Centre, Liverpool Science Park and the extension of the Leeds Liverpool Canal across the Pier head in to the Albert Dock. Awarded the OBE for Services to Local Government and the CBE for Services to Regeneration. Lord Mayor of Liverpool. In the House of Lords is the Liberal Democrat Spokesperson on Children and Young people. A Patron of the Royal Life Saving Society, Careers Connect and Strawberry Fields – a College for young people with special. For pleasure and relaxation enjoys regularly going to the gym, pottering in the garden and reading for pleasure (sadly a member of a book club!)

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

Dr Deirdre Stritch, Provider Approval and Monitoring Manager - QQI Awards, Quality and Qualifications Ireland

Dr. Deirdre Stritch has held a number of roles with Quality and Qualifications Ireland (QQI), the national agency responsible for promoting quality and accountability in education and training in Ireland, and is currently Quality Assurance Approval and Monitoring Manager there. Deirdre has significant regulatory experience with private and public providers. She has participated in national steering groups dealing with the internationalisation of Irish education; developing new regulatory structures for international learners accessing Irish education and has contributed to the development of an amendment Bill to the Qualifications and Quality Assurance (Education and Training) Act, 2012. Previously, she managed projects related to the development and implementation of the National Framework of Qualifications with the National Qualifications Authority of Ireland and on national higher education policy development with the Higher Education Authority and the Royal Irish Academy.

All biographies provided by speakers

Westminster Higher Education Forum Keynote Seminar:
Contract cheating in higher education - prevention, detection, disruption and legislative options

22nd May 2019

About the sponsor

About Turnitin

Turnitin is your partner in fostering original thinking and supporting authentic learning. Turnitin solutions promote academic integrity, streamline grading and feedback, and improve outcomes across educational levels and content areas. Turnitin leverages cutting-edge technology to provide tools that prevent plagiarism, deliver formative and summative feedback, surface actionable reporting, and investigate academic misconduct.

Turnitin is committed to raising awareness about unethical behaviour in academia, and partners with institutions and experts in the field to bring to market a solution. *Contract cheating - the practice of third-parties completing assessments - is actively eroding the value of our educational systems and will persist unless institutions, educators, students, and industry partners unite to take action.* If contract cheating continues, higher education degrees lose significance, institutional reputations are jeopardised, and the skillset of the workforce is diluted.

In response to this issue, Turnitin's Authorship Investigate brings evidence and confidence to the process of investigating suspicions of contract cheating. Using forensic linguistic best practices and machine learning technology, the solution compares differences in written work and efficiently produces the evidence necessary to inform an investigation. The instantly generated Authorship Report organises document metadata, analyses readability scores, details punctuation usage, and compares the depth and breadth of vocabulary in the student's work. A top-level summary saves the investigator time by quickly identifying differences and potential issues.

Turnitin solutions currently serve over 13,000 institutions globally and is headquartered in Oakland, Calif., with international offices in the U.K., Netherlands, Australia, Korea, India, and throughout Latin America. @Turnitin

Text supplied by the sponsor **Turnitin**