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ACADEMIC PLAGIARISM IN MALAYSIAN HIGHER EDUCATION INSTITUTIONS: LEGAL PERSPECTIVE

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Abstract: *The incidents of plagiarism are prevalent in the academic community throughout the world. In the context of the academic community, plagiarism may damage the reputation as well as negatively affect the credibility and integrity of the institutions and those involved in such behaviours. This paper provides an overview of academic plagiarism in Malaysia and discusses the relevant Malaysian legal provisions, specifically those which applied to Malaysian public higher education institutions concerning the issue of plagiarism. Analysis of statutes and relevant case law was done by employing the doctrinal legal method. It is learned that a number of statutes governing the management and administration of the universities in Malaysia contain provisions on plagiarism that are to be subjected to disciplinary punishment. Of all the statutes, the paper found that the Educational Institutions (Discipline) Act 1976 (Act 174), which governs matters related to discipline in educational institutions but not including universities explicitly stated provision on plagiarism. The paper suggests that universities should adopt clear policy or guideline on student writing handling in order to avoid and deal with plagiarism issues effectively.*

Keywords: *Academic Plagiarism, Disciplinary, Malaysian Higher Education Institutions, University Students*

Introduction

Academic plagiarism and various types of academic dishonesty and misconduct in higher education institutions have always existed. Most studies confirmed plagiarism incidents were

practised by university students both in developed and developing countries (Abusafia, Roslan, Yusoff & Nor, 2018; Bisping, Patron, & Roskelley, 2008; McCullough & Holmberg, 2005; Wilson, 1999; McCabe & Treviño, 1997). Several recent studies in Malaysian universities indicated plagiarism, being part of academic dishonesty as one of the main problems faced by higher education institutions in Malaysia (Abusafia, Roslan, Yusoff & Nor, 2018; Zejno, 2018; Olesen, Amin & Mahadi, 2018; Mustapha, Hussin, Siraj & Darusalam, 2017; Ismail & Omar, 2017; Cheah, 2015; Singh, 2015; Moten, 2014; Ali, Ismail & Tan, 2012; Jihir, 2009).

Those studies concern on the prevalenve of academic honesty including plagiarism among students in accounting, engineering, nursing, technical and non-technical disciplines. However, Ismail & Omar (2017) claimed that although several studies have been conducted to examine academic dishonesty in Malaysia, the findings could not reveal the real scenario of academic dishonesty among Malaysian students due to limited number of respondents. Apart from the prevalence of academic dishonesty and plagiarism, prior studies conducted in Malaysia also include examining students' views on various components of academic dishonesty such as cheating on tests and plagiarism (Mohd, Salleh, Alias, & Hamid, 2013), students' understanding of plagiarism (Ali, Ismail & Tan, 2012), the link between academic dishonesty and personal beliefs and values (Ismail, 2014), the link with idealism, relativism and religios faith (Ismail & Omar, 2017) as well as plagiarism from the Islamic perspective (Zejno, 2018).

Plagiarism may damage the reputation as well as negatively affect the credibility and integrity of the institutions and those involved in such behaviours. The Chancellor of Universiti Sultan Azlan Shah, Sultan Nazrin Shah recently described plagiarism as an academic crime and said the dishonourable act against knowledge and intellectuals should be addressed firmly (Plagiarism, 2017). Gathercoal (2017) argued that plagiarism pollutes the academic literature, contaminates student assessments, instructor evaluations, and confounds all academic achievement grades which consequently, complicate all literature reviews and concomitant research.

Despite its negative consequences, in most situations, plagiarism may only be regarded as a common practice thus failed to attract public attention as a serious issue to be addressed (Singh, 2015). For example, it was reported that rates of plagiarism increased where the perceived seriousness of plagiarism and understanding of plagiarism decreased (Maxwell et al., 2008). Many students now consider these behaviors acceptable (Fain & Bates, 2002). This explains why a majority of students admit to plagiarize or cheating at least some of the time and simultaneously argue that those behaviors are not actually cheating (Bertram Gallant, 2011). Another research also showed that cheating has gone from morally reprehensible to merely morally disagreeable (Davis, Drinan & Bertram Gallant, 2009). This is especially true for behaviors such as copying homework, working with others on individual assignments, or plagiarism.

In dealing with this issue, Park (2003) recommended the higher institutions to develop cohesive frameworks for dealing with student plagiarism that are based on prevention supported by robust detection and penalty systems that are transparent and applied consistently. Walker (2006) viewed that opportunities for plagiarism among university students appear to be on the increase but there is evidence to suggest that official policies, procedures and responses on the part of some universities and academic staff may be

inconsistent and inequitable. In this respect, universities need to be more proactive in: developing strategies to raise student awareness of the unacceptability of student plagiarism; developing and enforcing policies aimed at controlling student plagiarism; and setting up programmes to promote academic integrity (Walker, 2006). Since plagiarism may involve a much more complex issue than suggested by a one-solution response, Macdonald & Carroll (2006) argued for a more holistic institutional approach that recognises the need for a shared responsibility between the student, staff and institution, supported by external quality agencies. An institution's academic integrity programs and policies, such as honor codes, can have a significant influence on students' behavior (McCabe, Trevino & Butterfield, 2001).

Recognizing that plagiarism immensely affects academic integrity, higher education institutions in many countries feel obliged to review their policies on academic misconduct. In Malaysia, academic policy on plagiarism is placed under the purview of the respective universities. There are a number of statutes governing the management and administration of the universities in Malaysia containing provisions on plagiarism that are to be subjected to disciplinary punishment. In fact, the needs on clear provisions or guidelines on plagiarism has been pointed out by the court in *Fauzilah Salleh v Universiti Malaysia Terengganu [2012] 4 CLJ 601* when the court stated that it is the duty of the university to issue a proper set of writing guidelines to students. Against this background, this paper provides an overview on academic plagiarism in Malaysia and discusses the relevant Malaysian legal provisions, specifically those which applied to Malaysian public higher education institutions concerning the issue of plagiarism. Analysis of statutes and relevant case law was done by employing doctrinal legal method. This method refers to "any systematic study of legal rules, principles, concepts, theories, doctrines, decided cases, legal institutions, legal problems, issues or questions or a combination of some or all of them (Yaqin, 2007; Zahraa, 1998).

What is plagiarism?

Most writings on this issue offer a lot of definitions that can describe the meaning of plagiarism. Many authors seem to offer similar definition of plagiarism referring to an act of using someone else's work as one's own. Hannabuss (2001) described plagiarism as the unauthorised use or close imitation of the ideas and language/expression of someone else. It involves representing their work as your own. It is usually associated, too, with little or no acknowledgement of the borrowing and the source. In clarifying the term, Palmquist, (2011) explained plagiarism as a form of intellectual dishonesty, involves unintentionally using someone else's work without properly acknowledging where the ideas came from (the most common form of plagiarism) or intentionally copying someone else's work and passing it off as your own (the most serious form of plagiarism). Hexham (2005) proposed a more comprehensive definition as follow:

> Plagiarism is the deliberate attempt to deceive the reader through the appropriation and representation as one's own the work and words of others. Academic plagiarism occurs when a writer repeatedly uses more than four words from a printed source without the use of quotation marks and a precise reference to the original source in a work presented as the author's own research and scholarship. Continuous paraphrasing without serious interaction with another person's views, by way or argument or the addition of new material land insights, is a form of plagiarism in academic work.

According to MacDonald Ross (2004), most definition of plagiarism usually include the following elements:

- a deliberate intention to cheat;
- copying or paraphrasing a text without acknowledgment;
- adopting someone else's ideas without acknowledgment.

In defining plagiarism, the Malaysian court in *Fauzilah Salleh v Universiti Malaysia Terengganu [2012] 4 CLJ 601* made a reference to well-known universities including the Oxford, Cambridge and Yale on how they define plagiarism. Based on the court observation in this case, plagiarisme may be seen as an act which generally involves taking one's idea without giving a proper attribution or acknowledgment to the original author, and claims the idea belongs to one's own. The court in this case also provides examples of plagiarism (at p.605) to include copying, quoting verbatim another person's work without due acknowledgement of the source, paraphrasing another person's work by changing some of the words, or the order of the words, without due acknowledgement of the source, using ideas taken from someone else without reference to the originator, submitting someone else's work as part of a candidate's own without identifying clearly who did the work."

There is similarity of the above definitions with the one stated in Black's Law Dictionary (Garner, 2012) as "the deliberate and knowing presentation of another person's original ideas or creative expressions as one's own". Black's Law Dictionary also elaborate that generally, plagiarism is immoral but not illegal. If the expression's creator gives unrestricted permission for its use and the user claims the expression as original, the user commits plagiarism but does not violate copyright laws. If the original expression is copied without permission, the plagiarist may violate copyright laws, even if credit goes to the creator.

Based on the various definitions above, it seems that the conduct of plagiarism in one way or another has an association with "copying" activity, an action that may be covered under the aspect of copyright law. The scope of this paper however does not cover the issue of infringement of copyright law, instead it only focusing on relevant statutes governing the management and administration of the universities in terms of dealing with plagiarisme issue.

Academic Plagiarism: Challenges to Malaysian Higher Education Strategic Planning

The conduct of pagiarism is in contrast with the Malaysian government national agenda and the National Higher Education Strategic Plan (NHESP) to produce human capital with a first class mind set in order to face developmental challenges in knowledge and innovation based economy in the future. In fact, Phase 2 of The National Higher Education Action Plan (2011-2015) emphasis further on the process of upgrading academia at a more comprehensive level. It states, among others, issues related to the development of human capital among the academics, the importance of enhancement of integrity, professionalism and authority, polishing of leadership potential and boosting of academic excellence towards worldclass status should be addressed through a dynamic process of strengthening the academic ecosystem. It is in accord with Malaysian Education Blueprint 2015-2025 (Higher Education) as well as the 9th (2006-2010), 10th (2011-2015) and 11th (2016-2020) of Malaysian Plans agenda. In this respect, the former Chief Secretary to the Government, Tan Sri Mohd Sidek Haji Hassan (2009), asserted that: "… we need public officials who will challenge the norms, dare the traditions and customs of what used to work…".

In realizing this aim, the Malaysian government introduced two policies in 2007; the National Higher Education Strategic Plan (NHESP) beyond 2020 and the National Higher Education Action Plan (NHEAP) 2007-2010 (Ministry of Education Malaysia official website) with the

intention of fostering academic excellence and enhancing the quality of higher education in Malaysia (Ahmad, Farley & Naidoo, 2012; Muda, 2008). The NHESP outlines the key thrusts in four distinct phases:

Phase	Key Trusts
Phase 1	Laying the foundation (2007-2010)
Phase 2	Strengthening and enhancement (2011-2015)
Phase 3	Excellence (2016-2020)
Phase 4	Glory and sustainability (beyond 2020)

The plans aim squarely on holistic human capital development, to produce Malaysians who are intellectually active, creative and innovative, ethically and morally upright, adaptable and capable of critical thinking (NHEAP, 2007). In fact, the 11th Malaysian Plan (2016-2020) emphasized further that "the future of Malaysia depends on Malaysians being united in diversity and sharing a common set of values and aspirations…..Malaysians are imbued with strong moral values, unquestionable ethics, and ingrained with honesty, integrity, and compassion". The 11th Malaysian Plan (2016-2020) is expected to extend the previous transformation initiatives in a bid to achieve highincome nation status. It is also worth to remind that the goals of Vision 2020, which forms the basis of the pursuit of high income status, encompass the creation of a society that is mature, progressive, and competitive traits that are associated with a First World mentality.

Accordingly, this paper argues that plagiarism practice will defeat the purpose of these plans as higher education institutions or universities become one of the platforms to mould and shape students' character and personality which led in determining the excellence of any universities. As such, this paper argues that it is important for the Malaysian public universities to have a clear policy which particularly addresses the issue of plagiarism. This will help to stimulate a better culture within academic society and maintain academic integrity on all public universities as stressed out in the above government's plans.

Relevant Legal Provisions on Plagiarism Issue

In Malaysia, there are a number of statutes governing the management and administration of the higher education institutions. Among the most important include:

- the Universities and University Colleges Act 1971 (Act 30) and Statutory Bodies (Discipline and Surcharge) Act 2000 (Act 605), which mainly governs the public universities; and
- the Private Higher Educational Institutions Act 1996 (Act 555), which assists the development of private higher education.
- the Educational Institutions (Discipline) Act 1976 (Act 174), which governs matters related to discipline in educational institutions but not including universities

Equally important are Malaysian Qualifications Agency Act 2007 (Act 679) that established the Malaysian Qualifications Agency as the national body responsible among other things to accredit higher educational programmes and qualifications, National Council on Higher Education Act 1996 (Act 546) that provides policy on the development of higher education and also Perbadanan Tabung Pendidikan Tinggi Nasional Act 1997 (Act 556) that responsible for providing loan to facilitate opportunities for students to further studies.

Of all these statutes, only Act 174 explicitly provides for student plagiarism as a disciplinary offence (Second Schedule of Act 174). Rule 8A of the Educational Institutions (Discipline of Students) Rules 1976 provides on prohibition against plagiarism and states that:

(1) A student shall not plagiarize any idea, writing, data or invention belonging to another person.
(2) For the purposes of this rule, plagiarism includes —
    (a) the act of taking an idea, writing, data or invention of another person and claiming that the idea, writing, data or invention is the result of one's own findings or creation; or
    (b) an attempt to make out or the act of making out, in such a way, that one is the original source or the creator of an idea, writing, data or invention which has actually been taken from some other source.

Rule 8A(3) detailed out situations in which plagiarism may take place. These include the conduct of publishing as the author of a work written by someone else; allows him/herself to be incorporated as a co-author of a work or forces another person to include his/her name in the list of co-researchers or as co-author when he/she has not at all made any written contribution to the work; transcribes the ideas or creations of others kept in whatever form and claims he/she is the creator of that idea or creation directly or indirectly; translation work without proper attribution and also extracts ideas from another person's writing or creation and makes certain modifications without due reference to the original source. The disciplinary punishment is provided in Rule 48 where a student who is found guilty of a disciplinary offence shall be liable to any one or combination of two or more punishments including of reprimand, a fine not exceeding RM500, barred from sitting for a part or all of the examinations and suspension or expulsion from the institution by the disciplinary authority.

Although the provisions on plagiarism in Act 174 are seen as comprehensive to deal with the issue, the applicability of the Act however limited to the type of higher educational institution as set out in the First Schedule, that are the polytechniques, teacher education institutes, matriculation colleges and community colleges. Therefore, reference need to be made to Act 30 for public universities and Act 555 for private universities respectively for provisions concerning the university.

Although there is no specific provisions on plagiarism in these statutes, Clause 53 of First Schedule of the Act 30 makes clear on the power of universities to deprive student's degree on grounds of academic misconduct. This clause provides that:

(1) If any member of an Authority, or any graduate of the University, or any person who has received a degree, diploma, certificate or other academic distinction from the University, is convicted by a court of law of any heinous offence whether within or without Malaysia, or is in the opinion of the Board guilty of scandalous conduct, it shall be lawful for the Chancellor, on the recommendation of not less than two-thirds of all the members of the Board –
    (a) to remove him from membership of the Authority; or
    (b) to deprive him of any degree, diploma or other academic distinction conferred upon him by the University.
(2) Scandalous conduct in subsection (1) includes wilfully giving any staff, officer, employee or Authority of the University any information or document which is false or misleading in any material particular in obtaining a degree, diploma, certificate or other academic distinction from the University.

In fact, most of the Malaysian universities adopted this provision as the basis of their Constitution and/or university's guidelines for the prohibition and punishment of plagiarism.

For example, Rule 6 of the University of Malaya (Discipline of Students) Rules 1999 states that:

(1) A student shall not plagiarize any idea/writing, data or invention belonging to another person;
(2) For the purpose of this rule, plagiarism includes –
    (a) The act of taking idea, writing, data or invention of another person, and claiming that the idea, writing, data or invention is the result of one's own findings or creation; or
    (b) An attempt to make out or the act of making out, in such a way, that one is the original source or the creator of an idea, writing, data or invention which has actually been taken from some other source.

Notwithstanding the challenge put forward by the plagiarist, there are implications for the act of plagiarism. In this regard, most universities generally provide that plagiarism to be subjected to the disciplinary punishment. Rule 48 of the University of Malaya (Discipline of Students) Rules 1999 for example provides that:

A student who commits a disciplinary offence under these Rules and is found guilty of the offence shall be liable to any one or any appropriate combination of two or more of the following punishments:

(a) A warning;
(b) A fine not exceeding two hundred ringgit;
(c) Exclusion from any specific part or parts of the University for a specified period;
(d) Suspension from being a student of the University for a specified period;
(e) Expulsion from the University.

The application of university policy in handling plagiarism issue can be seen in the case of *Fauzilah Salleh v Universiti Malaysia Terengganu [2012] 4 CLJ 601*. In this case, the plaintiff Master's Degree which was awarded by the defendant in 2006 has later be revoked in 2008 on the ground that she had committed plagiarism. The plaintiff filed the suit claiming that the revocation of her Master's Degree was in violation of clause 57 of the defendant's Constitution and the principle of natural justice and therefore asked for a declaration that the revocation was invalid and an order for the return of the degree to her. The court in its judgment allowing the plaintiff's claim while found that she has committed plagiarism, among other things, observed that the failure of supervisor to properly supervise the research, in particular the writing process of student's thesis, has partly contributed to the commission of plagiarism. The court also stressed on the duty of the university to issue students writing their thesis with a proper set of writing guidelines (at p.602).

This case clearly demonstrates that plagiarism issue must carefully be handled at the university level. In this respect, university has a responsibility to issue and disseminate a clear policy or guideline on how students should write their work in a proper manner to avoid them committing plagiarisme. This paper argues that the issuance of clear policy or guideline not only provides guidance to students, administrators and supervisors in undertaking their written work or research in compliance with the university regulations, rules, code and policy, but also encourages all university citizens to maintain their integrity and best practice in life as well as in producing their work.

Conclusion

Plagiarism is considered as one of the serious academic misconduct, containing the element of cheating, that is, taking someone else's work or ideas without giving a proper recognition to its actual owner. Not only it violates the right of the actual owner, plagiarism may also tarnish

the reputation of those involved in such behaviours, the people as well as the institution. This is in contrary to government national agenda in producing the citizen with a first class mind set who possessed professional qualification and skill but at the same time practising and maintaining integrity and moral values in their life. The role of the university in this context is seen significant in nurturing good practice and conduct to its citizen to produce work in a proper manner. As such, clear policy or guideline that explicitly prohibit plagiarism must be provided so that all parties in the university aware and have knowledge on how to avoid such offences. In this regard, provisions on plagiarism as spelled out in Act 174 is highly recommended to be considered in preparing university policy or guideline on academic plagiarism.

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