

# UNIVERSITY ADMISSIONS POLICY: FRAUDULENT APPLICATIONS

## Version 1

### Policies superseded by this version

This document replaces the 'University Admissions Policy: Fraudulent Applications February 2025' document (legacy City) and Section 16 of the 'Admissions Policy' (legacy St George's), with effect from July 2026 for the 2027 admissions cycle.

### Summary of changes to previous version

The policy has been re-written following a review prompted by the need to update and harmonise admissions policies across City St George's (the University) following the merger.

### Table of contents

| Section: | Heading:                               | Page number: |
|----------|----------------------------------------|--------------|
| 1        | Introduction                           | 1            |
| 2        | Freedom of Speech and Academic Freedom | 1-2          |
| 3        | Equality, Diversity and Inclusion      | 2            |
| 4        | Definitions                            | 2            |
| 5        | Policy                                 | 2-4          |
| 6        | Procedure                              | 4-7          |
| 7        | Advice and guidance                    | 7            |
| 8        | Failure to comply                      | 8            |
| 9        | Review                                 | 8            |

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## 1 Introduction

- 1.1 City St George's, University of London (the University) has a zero-tolerance approach to academic fraud. This policy seeks to minimise the risk of academic fraud to the University and ensure regulatory compliance, including adherence to Office for Students registration requirements and UKVI Student sponsor obligations.

## 2 Freedom of Speech and Academic Freedom

- 2.1 The University regards freedom of speech and academic freedom to be fundamental to delivering its mission as the University of business, practice and the professions. Its values in this respect are set out in a code of practice on freedom of speech and academic freedom, which explains how the University will uphold, secure, and promote freedom of speech within the law:  
<https://www.citystgeorges.ac.uk/about/governance/policies/code-of-practice-on-freedom-of-speech>.

- 2.2 Nothing in this policy should be interpreted in any way that would be inconsistent with the code of practice and – in the event of any inconsistency – the provisions of the code will prevail.

### **3 Equality, Diversity and Inclusion**

- 3.1 The University works to advance equity, diversity and inclusion in its activities, processes, and culture, for the whole University community, including staff, students and visitors.
- 3.2 The University will meet its obligations under the Equality Act 2010 in its policies and seek to eliminate discrimination on the basis of age, disability, neurodiversity, sex, gender reassignment, gender identity, marital status, pregnancy, caring responsibilities, sexual orientation, race, nationality, ethnic origin, religion and belief and socio-economic background.

### **4 Definitions**

- 4.1 The Fraud Act 2006 defines fraud in three main ways:
- Fraud by false representation
  - Fraud by failing to disclose information, and
  - Fraud by abuse of position.
- 4.2 Examples of fraud in relation to a University application include but are not limited to:
- False information given on an application regarding qualifications or experience
  - Provision of a fake certificate or reference to support an application
  - False information to support determination of a fee status
  - Deliberate omission of relevant information e.g. the non-inclusion of information regarding previous qualifications
  - False or misleading information contained in a personal statement
  - False or misleading information relating to work experience
  - Some other act of deception.
- 4.3 Under the Fraud Act 2006, fraud can occur if there is an intention to gain or cause a loss to someone else, even if no actual gain or loss takes place. The key element is the intention to deceive for personal gain or to cause detriment to another.
- 4.4 Plagiarism is the unacknowledged inclusion of material derived from the published or unpublished work of another person (such as from the internet or from another applicant), whether this is intentional or unintentional.
- 4.5 This is not restrictive and may cover any act of deception intended to result in personal or financial gain associated with being admitted to the University.

### **5 Policy**

#### **5.1 Purpose**

- 5.1.1 The policy seeks to minimise the risk of academic fraud to the University and ensure regulatory compliance. This includes robust and clear procedures for identifying instances of fraud during the admission process and taking prompt and appropriate action.

## 5.2 Scope

- 5.2.1 This policy applies to the admission of applicants to all undergraduate and postgraduate (taught and research) courses at the University.
- 5.2.2 The policy includes all information pertaining to the applicant, even if it is received through alternative sources, such as agents or pathway providers. Any applicant information received through these routes will be the responsibility of the applicant themselves.
- 5.2.3 These procedures can also be applied to the case of a current student if the University has grounds to believe that they obtained their place based on fraudulent information.
- 5.2.4 If a current student is suspected of providing fraudulent information to gain entry, it is responsibility of the School to agree an appropriate course of action. Students who have already registered at the University are subject to the [Terms and Conditions](#) for Study at the University, and may have their registration terminated under section 3.7 of that code or may be subject to the [Student Disciplinary Regulations](#) and, in certain programmes which are regulated by professional, statutory and regulatory bodies, the [Fitness to Practise Policy](#).
- 5.2.5 This policy does not cover suspected academic misconduct by registered students. This is dealt with under the [Academic Integrity & Misconduct Policy](#) and [Assessment Regulations](#).

## 5.3 Principles

- 5.3.1 The University is not prepared to admit applicants on the strength of information considered to be either fraudulent or plagiarised and reserves the right to reject or cancel an application under these circumstances.
- 5.3.2 The University also reserves the right to:
- Request additional information to verify an application
  - Place the application process on hold whilst investigating the alleged/suspected fraudulent application and/or plagiarism
  - Reject an application if it is proven, or if the University has reasonable grounds that the information provided within the application is false, or if the applicant refuses to provide the requested information
  - Terminate a student's registration if they are found, after registration, to have submitted a fraudulent application to the University.
- 5.3.3 A condition of acceptance of a place at the University is that all information provided by the applicant for the purposes of assessment of the application must be accurate. This is outlined in the [University's terms and conditions](#).

- 5.3.4 This information will be retained and used in accordance with the law and may be shared with UCAS or other bodies for the purposes of verifying the identity, qualifications, references, or other application related documents of an applicant.
- 5.3.5 The suspected fraud will be reported to the Director of Internal Audit for reporting to relevant authorities and notifying the Chair of the Audit and Risk Committee where appropriate.
- 5.3.6 Applicants and students committing fraud are not only breaching University rules and regulations and therefore being subject to those sanctions, but they are also breaking UK law and therefore could find themselves subject to UK law and the penalties that could be applied there.
- 5.3.7 The University reserves the right to inform relevant parties of action taken if the University can demonstrate fraud has taken place. This includes, but is not limited to, UCAS and the applicant's school and/or place of work.
- 5.3.8 If the University can demonstrate fraud has taken place, any money paid to the University during the application (most typically as part of a deposit) will not be refunded.
- 5.3.9 If the University can demonstrate fraud has taken place, any financial costs incurred by the applicant to support their studies (including accommodation and travel costs) will not be refunded.
- 5.3.10 Where a current student has had their registration terminated, that student should read the [Student Disciplinary Regulations](#).
- 5.3.11 If the University can demonstrate fraud has taken place, future applications from the applicant will be rejected.
- 5.3.12 The University is responsible for ensuring that all admissions staff have access to the relevant information to support the implementation of this policy.
- 5.3.13 The University is responsible for ensuring that all admissions staff are supported in the implementation of the procedures attached to this policy.

#### **5.4 Roles and responsibilities**

- 5.4.1 The relevant Admissions Manager, supported by the Admissions team, has responsibility for investigating and possible instances of fraudulent activity and providing appropriate advice and guidance. Roles and responsibilities are described in more detail in Section 6 and 7.

## **6 Procedure**

### **6.1 Use of Artificial Intelligence (AI) in the Admissions process**

- 6.1.1 The University recognises that applicants may use AI tools when preparing application materials. However, applicants are required to ensure that all information submitted as part of their application is accurate and represents their own work.

- 6.1.2 The submission of content that has been generated wholly or predominantly by AI, or which has been substantially altered by AI in a way that misrepresents the applicant's own abilities, may be treated as plagiarism or fraud under this policy.
- 6.1.3 Where an applicant attends an interview, assessment or other selection activity, the use of AI tools (including, but not limited to, real-time response generation, prompting tools, or transcription software) is not permitted unless explicitly authorised by the University in advance, and may be treated as plagiarism or fraud under this policy.
- 6.1.4 Where there is reasonable suspicion that AI has been used inappropriately at any point in the application process, the University reserves the right to:
- Request further explanation from the applicant;
  - Disregard the outcome of the assessment; or
  - Reject the application in line with this policy.
- 6.1.5 In these instances, applicants will be contacted by the relevant member of the Admissions Office to discuss the matter. If the applicant does not respond, or it is deemed following a response that an application cannot progress, the applicant will receive a rejection on their application and will be provided with the details of the Admissions Appeals and Complaints Procedure.
- 6.2 UCAS similarity detection for personal statement (UCAS Applicants)**
- 6.2.1 UCAS check all personal statements using a similarity detection system, Copyscape. Each incoming personal statement is compared against a library of personal statements already in the UCAS system and a library of sample statements collected from a variety of websites. Any statements showing significant levels of similarity are reviewed by members of the UCAS Similarity Detection Service.
- 6.2.2 The University is then notified of any cases where there are reasonable grounds to suspect plagiarism. At the same time, an applicant is also notified that the personal statement has been identified as potentially plagiarised.
- 6.2.3 The decision about what action, if any, to take regarding notified cases rests with the University.
- 6.2.4 It is the responsibility of a member of the Admissions Office to flag this information on an applicant's record on the student record system and contact the applicant in relation to the results. It is at the discretion of the University in deciding if an application can be further considered or rejected based on a UCAS similarity alert.
- 6.2.5 In cases where an applicant is contacted for further information regarding their personal statement, they will have five working days to respond. Applicants who do not reply within this timeframe will be rejected.
- 6.2.6 Should the applicant provide a response, this explanation and accompanying evidence will then be considered by the Admissions Office, alongside all other elements of the application. It is ultimately the University's right to determine whether there is a case to be answered.

- 6.2.7 If the information provided by the applicant is sufficient to demonstrate there has been no plagiarism, then this will be communicated to the applicant and their application will be considered in the normal way.
- 6.2.8 If the Admissions Office deems that an offer cannot be made, the applicant will receive a rejection of their application and can appeal this through the Admissions Appeals and Complaints Procedure, details of which are available on the University's website.
- 6.2.9 The University reserves the right to revoke any application where information is received from UCAS following additional information from the applicant regarding similarity detection.

### **6.3 Qualification Verification Process**

- 6.3.1 It is the responsibility of the Admissions Office to ensure that all applicants who are admitted to the University have verified qualifications.
- 6.3.2 For applicants applying through UCAS qualification verification will be conducted, in most cases, by UCAS. Usually, no further checking is required in this instance.
- 6.3.3 Where applicants have disclosed qualifications not verifiable by UCAS, the relevant member of the Admissions Office will attempt to validate this information using the verification tools available to them.
- 6.3.4 For UK educated applicants, sources for this information include the Learner Records Service (LRS) provided by the Government and verification tools provided on Higher Education Achievement Records.
- 6.3.5 For non-UK educated applicants, formal evidence of qualifications will be requested by the relevant Admissions Officer. Additional verification tools can be employed at the discretion of the Admissions Officer.

### **6.4 Supporting Application Documents Verification Process**

- 6.4.1 The University considers several other information sources when considering an application. This can include but is not limited to references, tests, passport information, immigration history and other documents when requested as part of the assessment process.
- 6.4.2 The University may request further information, including certified copies of supporting documents, if not already provided, from an applicant to further verify any information provided.
- 6.4.3 The University will verify language qualifications with the awarding body (e.g. IELTS, TOEFL).
- 6.4.4 The University may seek confirmation from a third party (e.g. an awarding institution to confirm an applicant's grades or attendance).
- 6.4.5 The University may contact referees to confirm the information provided or to check authenticity of a referee.

6.4.6 Where an applicant is suspected of providing information which may not be legitimate, the University reserves the right to request further explanation from the applicant.

#### **6.5 Procedures for dealing with suspected qualification and supporting documentation fraud**

6.5.1 Where an applicant is suspected to have provided information on their application which does not match the information on the verification tool, the relevant Admissions Officer will write to the applicant to query the discrepancy.

6.5.2 It is the responsibility of the Admissions Officer to set an appropriate period for the applicant to respond to this query, this is typically five working days.

6.5.3 If the applicant does not respond during this timeframe, their application will be rejected.

6.5.4 Should the applicant provide a response, this explanation and accompanying evidence will then be considered by the Admissions Office and the Admissions Tutor, alongside all other elements of the application. It is ultimately the Admissions Manager's responsibility to determine whether there is a case to be answered.

6.5.5 If the information provided by the applicant is sufficient demonstration to be judged as evidence, this will be communicated to the applicant, and they will receive confirmation of the outcome.

6.5.6 If the Admissions Manager judges that an application cannot progress, the applicant will receive a rejection on their application and will be provided with the details of the Admissions Appeals and Complaints Procedure.

6.5.7 All information provided to accompany an application is processed and retained on file in line with the University's Privacy Notice.

#### **6.6 Right to Appeal**

6.6.1 Any applicant whose application is rejected within the scope of this policy will have the right to appeal against the decision using the Admissions Complaints and Appeals Procedure.

6.6.2 Any registered student who has been excluded on the grounds that they have gained their place fraudulently will have their case managed through the [Student Disciplinary Regulation](#) which includes a right to appeal against the University's decision.

## **7 Advice and guidance**

7.1 Advice and guidance for applicants will be provided by the relevant Admissions team. Admissions teams can be contacted via the [online contact form](#). Current students seeking advice and guidance should contact the Course Office in the first instance. Contact details can be found via the [StudentHub](#).

## 8 Failure to comply

- 8.1 The University, applicants and students must comply with this policy. The University reserves the right to reject the current and future applications of applicants who fail to comply. Current students who fail to comply will have their case managed through the Student Disciplinary Regulation. Applicants and students who believe that the University has failed to adhere to this policy can submit an appeal or complaint, as described in section 6.5.

## 9 Review

- 9.1 The policy is reviewed by the Director of Admissions, supported by the Admissions team, and is approved by the University Senate, chaired by the President of the University. The policy is reviewed on an annual basis.

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### Policy information

Should you require further information regarding this policy or access to the policy in an alternative format, then please contact the Admissions team via the [online contact form](#).

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| <b>Primary Author:</b>        | Jilly Crosby and Sarah de Gatacre                                                                                                                     |
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