

UNIVERSITY ADMISSIONS POLICY AND PROCEDURE: CRIMINAL CONVICTIONS

Version 1

Policies superseded by this version

This document replaces the 'University Admissions Policy and Procedure: Criminal Convictions' (legacy City) and the criminal conviction content of Section 10 and 19 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 following the merger.

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1 Introduction

- 1.1 City St George's, University of London (the University) wishes to ensure that higher education is available to all who will benefit from it, irrespective of their background. In this context, having a criminal record will not necessarily mean that an applicant cannot be admitted to their chosen course. This policy and procedure seek to ensure the fair treatment of all applicants and to uphold the values outlined in the Rehabilitation of Offenders Act 1974 or any previous or future equivalents of this Act.

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.
- 2.3 The Office for Students ("OfS") operates a free speech complaints scheme. Under that scheme, the OfS can review complaints about free speech from non-student members, staff, applicants for academic posts and (actual or invited) visiting speakers. The scheme is free to use. Information about the complaints that the OfS can review is available on its website at: www.officeforstudents.org.uk/for-providers/freedom-of-speech/free-speech-complaints. Student complaints about freedom of speech issues are handled by the Office of the Independent Adjudicator for Higher Education ("OIA"). Information about how the OIA handles such complaints can be found on its website (<https://www.oiahe.org.uk/resources-and-publications/latest-news-and-updates/oia-highlights-role-in-student-free-speech-complaints/>).

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 University operates a different policy for **spent** and **unspent** conviction for the majority of its courses. [The Ministry of Justice website can be consulted](#) for a definition of 'spent' and 'unspent' convictions and details of rehabilitation periods. If an applicant is uncertain as to whether the conviction is 'spent', independent advice should be sought.
- 4.2 **School(s):** the University has six academic units called Schools, each of which oversees specific subject areas and is responsible for the management of admissions, curriculum, and student administration for programmes within its discipline.

5 Policy

- 5.1 **Purpose**
 - 5.1.1 This policy seeks to support the University's aim to availability of higher education to all, irrespective of background, while ensuring a safe and secure environment for all students, staff and visitors.

5.2 **Scope**

- 5.2.1 All applicants who wish to share information related to their spent criminal conviction can choose to do so. Applicants can do this by informing the relevant Admissions Team and this information will have no impact on your admissions decision.

5.3 **Principles**

- 5.3.1 The University has to consider the demands of various professional bodies and requirements under the law to protect special categories of people. Some of our courses that lead to professional careers are exempt from the Rehabilitation of

Offenders Act 1974. These courses may have particular requirements relating to the disclosure of warnings, reprimands, cautions and criminal convictions which are dealt with on a specific course basis and require applicants to agree to submit to criminal record checks by the Disclosure and Barring Service (DBS) or international equivalent. In this instance, the requirement for the DBS check will be listed on the course page on the website.

- 5.3.2 In general, a criminal record is not regarded as an obstacle to studying. The University will typically not consider criminal convictions which are deemed 'spent' under the terms of the Rehabilitation of Offenders Act 1974, when selecting applicants for admission, bar course-specific exemptions where a DBS check is an entry requirement, outlined in this policy (Section 6.2).
- 5.3.3 The University reserves the right to request the disclosure of criminal convictions in exceptional circumstances.
- 5.3.4 In accordance with the University's responsibilities to provide a safe and secure environment for its staff, students, visitors and others, the University will request information about relevant, unspent criminal convictions, so that appropriate steps can be taken to facilitate effective support and/or assess whether an applicant poses an unacceptable risk within the University community.
- 5.3.5 If an unspent criminal conviction is disclosed by a third party to the University, and the University wishes to make or has made the applicant an offer, a member of the admissions team may request further information from the applicant to clarify the position before any further decision is made in respect of the applicant's offer.
- 5.3.6 The University will determine whether an unspent criminal conviction gives reasonable grounds for the University to deny admission of the individual if the conviction:
 - a) poses a real threat to the safety or property of staff, students, visitors, or others coming into contact with the individual; or
 - b) would be contrary to the law or to the requirements/guidance of any relevant professional or other regulatory body.
- 5.3.7 The University must balance its responsibility to provide a safe and secure environment and community for its staff, students, visitors and others. Therefore, the University may amend or withdraw an applicant's offer to study or terminate a student's registration and/or withdraw services or facilities (such as placements) at any time if it determines that reasonable grounds have been met as outlined above.
- 5.3.8 The University may take the necessary action against an applicant or student by using its Admissions Policy, Fitness to Study Policy, Fitness to Practise Policy and Student Disciplinary Regulations and/or other relevant policy or procedure as listed on the [University's website](#).
- 5.3.9 The Schools with courses that require a DBS check maintain additional policies regarding the admission of those with criminal convictions, which should be read in conjunction with this policy. These policies can be accessed on the relevant School's webpages, or by contacting the Admissions team.

5.3.10 The University must balance its responsibility to provide a safe and secure environment and community for its staff, students, visitors and others. Therefore, the University may cease to consider an applicant, may amend or withdraw an applicant's offer to study or terminate a student's registration at any time if it determines that the applicant's criminal convictions will not meet the requirements of the relevant professional or regulatory body, or deems an applicant to pose an unacceptable risk within the University community.

5.3.11 The University reserves the right to deny admissions to any applicant who failed to disclose their criminal conviction at any point in the admissions process when this information is requested.

5.4 Roles and responsibilities

5.4.1 The relevant Admissions team are responsible for ensuring that the admissions processes are initiated and adhered to.

6 Procedure

6.1 Admission of applicants with criminal convictions for courses that do not require a DBS check

6.1.1 Applicants for courses that do not require a DBS check are not required to declare spent criminal convictions. All applicants who wish to share information related to their spent criminal conviction can choose to do so. Applicants can do this by informing the relevant Admissions Team and this information will have no impact on the admissions decision.

6.1.2 Typically, applicants with unspent criminal convictions applying for courses that do not require a DBS check will be asked to disclose this information at the point of accepting an offer.

6.1.3 Applicants who firm an offer on UCAS, or accept an offer for a direct application, are expected to disclose any unspent convictions up to and including the date of registration.

6.1.4 Students are required to declare all relevant unspent criminal convictions gained after admission to the University.

6.1.5 On receipt of the details of the unspent criminal conviction, a Criminal Convictions Admissions Review Panel (CCARP) will be convened, as outlined in Sections 6.16-32.

6.1.6 Where the applicant is registered on a professional course, it may also be necessary for the matter to be referred to the relevant professional or regulatory body.

6.2 Admission of applicants with criminal convictions for courses that do require a DBS check

6.2.1 Some courses, including all pre-registration courses in the School of Health and Medical Sciences are exempt from the Rehabilitation of Offenders Act 1974,

under the provisions of the Exceptions Order 1975. This means that applicants are obliged to declare all previous criminal convictions (spent and unspent), cautions and reprimands as a condition of admission and complete a DBS check.

- 6.2.2 If a course requires a DBS check this will be on the relevant course page on our website and detailed in the offer conditions.
- 6.2.3 In some instances, applicants may be asked to disclose criminal convictions through an electronic form, following which the DBS check may be required earlier in the admissions process. This prevents delays to offer making due to incomplete DBS checks.
- 6.2.4 An unconditional offer to study will not be made when an applicant has not completed a DBS check and the criminal convictions of an applicant are unknown.
- 6.2.5 On completion of the DBS check, and in receipt of the details of the criminal conviction, a Criminal Convictions Admissions Review Panel (CCARP) will be convened, as outlined in Sections 6.16-32.

6.3 Criminal Convictions and Immigration (UKVI)

- 6.3.1 If an applicant receives an offer to study and requires a visa or an extension to a visa, then the applicant will have to declare any criminal convictions (including minor offences) when applying to UK Visas and Immigration.
- 6.3.2 Applicants should be aware that there is a possibility that UK Visas and Immigration may reject a visa application on the grounds of a prior criminal conviction. [Immigration Rules](#) and [Guidance on Studying under Tier 4](#) should be consulted.
- 6.3.3 In the case where an applicant shares information via this route which is deemed to need further consideration, the International Student Advice and Visa Compliance Manager and the Admissions Manager will review this information before any further action is taken. This will either lead to the applicant continuing with their visa application with no further action required; or the applicant's information will be considered by the CCARP (see Sections 6.16-32) before an outcome can be reached.
- 6.3.4 For more information regarding the declaration of criminal convictions and Student Visa sponsorship, applicants can visit the [UK Council for International Student Affairs \(UKCISA\) website](#).

6.4 Criminal Convictions Admissions Review Panel (CCARP)

- 6.4.1 In the case of a serious unspent conviction being declared, or any criminal conviction is declared for programmes that require a DBS check, the Director of Admissions will look to convene a Criminal Convictions Admissions Review Panel (CCARP) to understand and clarify the circumstances surrounding the conviction, and determine whether the conviction will prevent the applicant from studying at the University.
- 6.4.2 CCARP members typically include the Director of Admissions as Chair, the University Safeguarding Lead, and the Head of Academic Services of the relevant

School, or their delegates. The panel may also include, where relevant, others such as the Admissions Tutor or equivalent from the relevant School.

- 6.4.3 In the event of a CCARP, applicants will be required to provide a written statement setting out any information considered relevant for the purposes of the panel, including any extenuating circumstances or mitigating factors.
- 6.4.4 Applicants may also be required to submit additional documentation, including character references and further evidence. In addition, further information, including references, may be requested from the applicants' Probation Officer and/or prison authorities, if relevant.
- 6.4.5 If the University requires additional information, and the applicant fails to provide this by the specified date, the offer will be withdrawn.
- 6.4.6 Any case forwarded to the Panel for consideration will be anonymised and therefore all documents received will be redacted to remove any personal details so that applicants cannot be identified. After each Panel, additional copies of any documentation will be permanently destroyed by Panel members. Relevant information will be kept securely in line with data protection requirements and the University policy on record keeping set out below in Sections 6.33-36.
- 6.4.7 In making a decision, the Panel will consider whether the criminal record of an applicant ultimately gives reasonable grounds for considering that the admission of the individual poses a real threat to the safety or property of staff, students, visitors or others involved in University business. The factors that may be taken into account include but are not limited to the following:
 - a) The nature and circumstances of the offence(s);
 - b) An assessment of risk to members of City St George's community and others with whom the applicant will have contact whilst studying at the University;
 - c) How long ago the offence(s) took place;
 - d) Likelihood of repeat reoffending;
 - e) Applicant's current circumstances;
 - f) In the event of more than one offence, whether each was a single occurrence or part of a series of similar occurrences;
 - g) Evidence of the efforts that have been made to elicit extra information from the applicant and from other bodies, such as the Probation Service, and the applicant's co-operation with this process.
- 6.4.8 The Panel will consider convictions and matters related to other criminal disclosures on a case-by-case basis. The Panel will reach a decision based on the balance of probabilities, based on all of the facts available at the time. The Panel will also agree any specific additional conditions that may be required and will formally amend the conditions of the offer to reflect this.
- 6.4.9 The Panel will make a decision with a rationale based on the evidence. The Panel need not be unanimous in its decision but should base its recommendation on the majority view. Where this is not possible, the Chair will have the casting vote.
- 6.4.10 The Panel on behalf of the University reserves the right to refuse to admit an applicant where it believes that their criminal record makes it inappropriate for

them to be admitted. If the case is heard by a Panel, the applicant will have the right to receive feedback and a rationale based on its decision. The applicant will be notified in writing of the Panel's decision within five working days of the outcome of the Panel meeting.

- 6.4.11 The applicant has a right of appeal against the decision of the Panel. Appeals against the decisions of the Panel will only be considered on the following grounds:
- a) the decision to not admit the applicant was not commensurate with the seriousness of the conviction;
 - b) the findings of fact in support of the decision were manifestly perverse;
 - c) that the Panel was not conducted in accordance with this policy and procedure;
 - d) new evidence has been made available that could not be available at the time of the Panel and which could have been expected to have materially affected the decision of the Panel.
- 6.4.12 An appeal against the decision of the Panel must be made in writing to the Director of Admissions and must be submitted within 10 working days after receipt of the letter informing the applicant of the decision of the Panel.
- 6.4.13 The Director of Admissions will reject any appeal against the decision of the Panel that has not been lodged in accordance with the stated time period or which does not demonstrate one of the grounds for appeal set out above.
- 6.4.14 Where the requirements for a valid appeal as set out above have been met, any new evidence will be reviewed by the Director of Admissions, and where necessary, additional information may be requested. The decision of the Director of Admissions will either be to uphold the decision of the Panel, or to convene an Appeal Panel.
- 6.4.15 In the case of an Appeal Panel, the Panel will, where possible, be comprised of different people of the same or similar roles than those on the first panel.
- 6.4.16 The Panel will consider all further information submitted by the applicant and the review by the Director of Admissions. Following the completion of the Appeal Panel meeting, the Panel may decide:
- a) to reconsider the original decision; or
 - b) to recommend that the original decision should stand.
- 6.4.17 The outcome of the Appeal Panel is final and will be communicated to the applicant within 10 working days of the Panel decision.

6.5 Record keeping and data protection

- 6.5.1 Applicants should be reassured that information declared regarding criminal conviction and all communication about their criminal conviction will be dealt with on a strictly confidential basis. Information relating to convictions is special category data under the terms of data protection legislation and staff will ensure that all such information is stored and protected in accordance with the University's data protection policies and Privacy Notice.

- 6.5.2 The Director of Admissions will keep a record of all cases dealt with in accordance with the University's legal data protection requirements and our published Privacy Notice. This record will ensure that any decision can be verified, to show that procedures have been correctly followed and to allow any feedback to the applicant if required. All records and correspondence relating to an applicant declaring a relevant criminal conviction will be securely stored in accordance with the University's legal data protection requirements and our published Privacy Notice.
- 6.5.3 If a criminal conviction is declared and the application is successful, all records and correspondence relating to the application and supporting materials will form part of the student's personal record and will be kept in the same way as all other student records. However, any information and correspondence relating to the applicant's conviction will be stored separately and securely. A decision will be made, based upon individual circumstances, and informed by the decision of CCARP and the University's data protection policies, on who, if anyone, within the University should be provided with further details of a conviction.
- 6.5.4 If a criminal conviction is declared and the application is unsuccessful, all documents will be securely destroyed/deleted in line with the University's retention schedules.

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 deny admission to applicants who fail to comply with this policy. Current students who fail to comply will have their case managed through the Student Disciplinary Regulation. Appeals against CCARP decisions can be submitted as described in Sections 6.26-32 Applicants and students who believe that the University has failed to adhere to this policy can submit a complaint via the [Admissions Complaints and Appeals Procedure](#).

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.

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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