

Intention to Study Assessment Policy

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| **POLICY TITLE** | Intention to Study Assessment Policy |
| **DATE APPROVED** | 03/07/2024 |
| **APPROVING BODY** | Academic Board |
| **VERSION** | 2 |
| **PREVIOUS REVIEW DATES** | June 25 |
| **NEXT REVIEW DATE** | June 28 |
| **OUTCOME OF EQUALITY IMPACT ASSESSMENT** | No impact |
| **RELATED POLICIES / PROCEDURES / GUIDANCE** | Admissions PolicyPolicy on the use of Fraudulent, False, Incorrect or Misleading Information to Gain Admission to the University,Student Visa Compliance Policy,International Student Engagement Monitoring ProcedureStudent Disciplinary Procedure  |
| **IMPLEMENTATION DATE** | September 24 |
| **POLICY OWNER (JOB TITLE)** | Director of Global Engagement |
| **UNIT / SERVICE** | Global Engagement Directorate |
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| **VERSION** | **DATE** | **REASON FOR CHANGE** |
| 2 | 09/06/2025 | Title change, updated Appeals procedure and amended review cycle in line with standard policy review timeframe. |

1. **Purpose**
	1. Cardiff Metropolitan University is licenced by UK Visas and Immigration (UKVI) of the Home Office to sponsor international students to study at its campuses in Cardiff (namely Llandaff and Cyncoed). It is a Higher Education Provider (HEP) with a track record of compliance. UKVI trusts the University to exercise its responsibility to maintain immigration control by fulfilling the duties imposed in the immigration rules and policy guidance and will act against the University, upon failure to do so.
	2. The purpose of this Policy is to establish the principles by which Cardiff Metropolitan University verifies a student’s genuine intention to study in the UK, thereby ensuring each student meets the UK’s Genuine Student Requirement under [Eligibility requirements for a Student](https://www.gov.uk/guidance/immigration-rules/appendix-student), and the University upholds its obligations under its UKVI Student Sponsor Licence.
2. **Scope**
	1. This Policy relates to all international students who are subject to UK immigration control under the Student Route. This Policy applies from the point of application until the point a student completes their studies and sponsorship under the Student Route.
	2. Where the University suspects an applicant of obtaining their place at the University on the basis of false, incorrect or misleading information, this will be referred for investigation in accordance with the [Policy on the use of Fraudulent, False, Incorrect or Misleading Information to gain admission to the University](https://www.cardiffmet.ac.uk/study/adviceforapplicants/Documents/FRAUDULENT%20FALSE%20INFORMATION.pdf).
3. **Background**
	1. Institutions holding a UKVI Student Sponsor Licence must ensure that the students it chooses to sponsor have a genuine intention to study in the UK. Student visas are granted on the basis that sponsors have fulfilled their sponsorship duties and performed relevant checks on the suitability of applicants. In accordance with the UKVI’s Student Sponsor Guidance, sponsors are expected to report students who are not believed to be genuine. Where an institution is found to breach its sponsorship duties, including admitting students who have no genuine intention of studying in the UK, UKVI may investigate and impose sanctions on the institution if it is deemed to pose a risk to immigration control.
	2. UK Border Force may refuse entry of student visa holders if there is a suspicion that the student has used the Student Route to enter the UK for reasons other than study. Alternatively, UK Border Force may defer decisions to the sponsoring institution as to whether they still wish to admit the student.
	3. Once an international student is enrolled, the University is obligated to maintain appropriate oversight and monitoring of students’ engagement with their studies, and compliance to the conditions of their Student Visa.
4. **Principles**
	1. Several factors will be considered when assessing if a student is a “genuine” student as detailed below. Please note that this is not an exhaustive list and will not be appropriate in every case. Other issues that arise may be taken into consideration as well.
		1. Immigration history
		2. Education history, study, and post-study plans
		3. Personal and financial circumstances
		4. The relevance of the programme being applied to.
		5. English Language ability
		6. Motivation to study at the University on the specified programme
		7. Credibility Interview Assessment
		8. Engagement with academic studies and with the University
		9. Proximity of UK address to campus of study
		10. Payment of Tuition Fees
	2. Where the University’s assessment of an application determines an applicant is not genuine in their intentions to study, the application will be rejected, or the offer of study withdrawn.
	3. Where the University has been notified by UK Border Force or UKVI and concerns raised as to a student visa holder’s genuine intentions or capability to study, the University will conduct an interview with the applicant in person to further assess the applicant’s genuine intention to study and capability to study. The findings will be escalated to a University panel who will determine the outcome of the interview, and whether the applicant will be permitted to enrol. The panel will consist of two senior members of staff, the Director of Global Engagement or nominee and the Chief Marketing, Communications and Student Recruitment Officer or nominee.
	4. Where concerns are raised about the English language level of a student on arrival at the university, prior to enrolment or post enrolment, the University will review the English language evidence submitted at application stage and conduct an interview in person to assess the student’s English language capability. The findings will be escalated to the University panel who will determine the outcome of the interview, and whether the applicant will be permitted to enrol or, if post enrolment, whether the student is permitted to continue with their studies.
	5. As a Student Sponsor Licence holder, the University is required to monitor the engagement of the student visa holders it sponsors. Data capture of in-person attendance at lectures and seminars is analysed weekly and any non-compliance will be acted upon in accordance with the University’s [International Student Engagement Monitoring Procedure](https://www.cardiffmet.ac.uk/international/study/info/Pages/Attendance-and-Engagement-Monitoring.aspx). Students who fail to engage or fail to re-engage to a satisfactory standard following appropriate support interventions, will be withdrawn from their programmes of study and student visa sponsorship withdrawn.
5. **Role and responsibilities of Applicant and Student:**
	1. To act with honesty and integrity and provide accurate information to the University at all stages, from application through to course completion.
	2. The Applicant or Student must respond and engage in all reasonable requests of the University for meetings or further information made under this Policy. Failure to engage in any written request of the University to provide information or to attend an interview within 5 working days may result in the University reporting to the UKVI to withdraw sponsorship of the student.
	3. As a student visa holder, the Applicant or Student must abide by all requirements as set out to them by the UKVI, UK Border Force and Cardiff Metropolitan University.
6. **Related Policies and Procedures**
	1. This Policy should be read in conjunction with the:
		1. University [Student Visa Compliance Policy](https://www.cardiffmet.ac.uk/about/policyhub/Documents/student-visa-compliance-policy-statement.docx)
		2. University [International Student Engagement Monitoring Procedure](https://www.cardiffmet.ac.uk/international/study/info/Pages/Attendance-and-Engagement-Monitoring.aspx)
		3. University [Admissions Policy](https://www.cardiffmet.ac.uk/study/adviceforapplicants/admissions_policy_2023/Pages/default.aspx)
		4. University [Policy on the Use of Fraudulent, False, Incorrect or Misleading Information to gain admission to the University](https://www.cardiffmet.ac.uk/study/adviceforapplicants/Documents/FRAUDULENT%20FALSE%20INFORMATION.pdf)
		5. Home Office Student Sponsor Guidance [Document 2 – Sponsorship Duties](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1169179/Student_Sponsor_Guidance_-_Doc_2_-_Sponsorship_Duties_2023-07-17.pdf).
		6. Home Office Immigration Rules [Appendix Student](https://www.gov.uk/guidance/immigration-rules/appendix-student)
		7. Home Office [Case Worker Guidance](https://assets.publishing.service.gov.uk/media/660d17f367958c0011365aac/Student%2Band%2BChild%2BStudent.pdf)
7. **Appeals Procedure**
	1. An applicant may appeal a decision to refuse a particular place on a programme within 7 working days following the date of the University’s decision. An appeal under this policy is defined as ‘a request for reconsideration of an admission decision and /or the outcome of an Intention to Study Assessment interview.
	2. A student or former student may appeal a decision to withdraw them from their programme within 7 working days following the date of the University’s decision. An appeal under this policy is defined as ‘a request for reconsideration of an immigration compliance decision and /or the outcome of an Intention to Study Assessment interview’.
8. **Monitoring and Review**
	1. The policy will be reviewed and updated every three years unless legislative or regulatory changes necessitate earlier review.
	2. The University reserves the right to revise its policies relating to compliance with its UKVI student sponsor duties at any time.



**Intention to Study Assessment Procedure**

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Key Details

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| PROCEDURE TITLE   | Intention to Study Assessment Procedure  |
| VERSION   | 2   |
| PREVIOUS REVIEW DATES   | 19/09/2025  |
| NEXT REVIEW DATE   | 05.07.2026   |
| IMPLEMENTATION DATE   | 05.07.2024  |
| PROCESS OWNER (JOB TITLE)   | Head of Global Student Advisory Service |
| UNIT / SERVICE   | Global Engagement - Immigration Compliance  |

Version Control

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| ***VERSION***   | ***DATE***   | ***REASON FOR CHANGE***   |
| *1.0*   | *31.01.2024*   | *First version*   |
| *1.1*   | *11.03.2025*  | *Follow up on action plans*  |
| *2*   | *19.09.2025* | *Following review of policy and name change*   |
| *2.0*   | *00 Month 0000*   | *Second version*   |
| *3.0*   | *00 Month 0000*   | *Third version*   |

**Introduction**

The following procedure is to be followed when concerns have been raised about an international applicant or student’s capability or genuine intention to study. This should be read in conjunction with the Intention to Study Assessment Policy.

The following procedure should be followed where concerns are raised about:

* an international applicant who has arrived in the UK but has not yet enrolled as a Cardiff Metropolitan University student or;
* an individual who is an enrolled international student.
1. **Applicants**
	1. Prior to enrolment, concerns about a student visa holder’s genuine intentions or capability to study, may be raised by UK Border Force, UKVI or a Cardiff Met staff member.
	2. The applicant must be immediately contacted via telephone and invited to attend an interview at the University within 3 working days of the call. This will be followed up by an email invitation. An applicant will not be permitted to enrol in advance of the interview.
	3. Once the latest enrolment date has passed, if no response has been received from the applicant, a report will be made to UKVI to confirm they have not enrolled and that the University is withdrawing their sponsorship. This will result in the cancellation of the applicant’s visa.
2. **Students**

2.1 Once an applicant is enrolled at the University as a student, and the

 University has grounds to believe that a place was obtained on the basis of

 fraudulent, false, incorrect or misleading information then the student may

 be dealt with under this procedure or referred under the [Policy on the Use of](https://www.cardiffmet.ac.uk/media/cardiff-met/content-assets/english-documents/The-Use-of-Fraudulent-False-Incorrect-or-Misleading-Information-to-Gain-Admission-to-the-University-Policy-1.docx)

 [Fraudulent, False, Incorrect or Misleading Information to Gain Admission to](https://www.cardiffmet.ac.uk/media/cardiff-met/content-assets/english-documents/The-Use-of-Fraudulent-False-Incorrect-or-Misleading-Information-to-Gain-Admission-to-the-University-Policy-1.docx)

 [the University](https://www.cardiffmet.ac.uk/media/cardiff-met/content-assets/english-documents/The-Use-of-Fraudulent-False-Incorrect-or-Misleading-Information-to-Gain-Admission-to-the-University-Policy-1.docx) or the [Student Disciplinary Procedure.](https://www.cardiffmet.ac.uk/media/cardiff-met/content-assets/english-documents/student-disciplinary-procedure.docx) The University

 reserves the right to determine which procedure is the most appropriate for

 each case.

2.2 Where the Student is to be investigated under the Intention to Study

 Assessment Policy, they will be invited to attend an interview to allow them

 to respond to concerns that have been raised about their genuine intention

 and/ or academic/ language capability to study at the University.

1. **Interview for Applicants and Students**

3.1 Two members of the Immigration Compliance team will conduct the

 interview and the interview will be video recorded. The recorded interview

 will be forwarded to a panel along with any recordings of previous credibility

 interviews (where applicable), as well as relevant academic documentation

 and a recommendation on how to proceed. This provides the panel with all

 available details required to determine the outcome.

3.2 The panel will consist of the Director of Global Engagement or nominee and

 the Chief Marketing, Communications and Student Recruitment Officer or

 nominee.

 3.3 The applicant or student will receive the outcome of the Intention to Study

 Assessment within 5 working days of the interview.

 3.4 All data and recordings will be stored securely and handled in line with

 GDPR guidelines.

 3.5 Once a decision has been reached, the Immigration Compliance Team will

 inform the Applicant or Student via email and provide instructions on the

 appropriate next steps.

 3.6 The University will inform UK Border Force and/or UKVI of the outcome

 where appropriate.

1. **Possible outcomes for Applicants**

**The Panel may agree one of the following outcomes:**

4.1 **Enrolment is permitted**:

4.1.1 Where the applicant is able to respond to the interview questions

 with the expected level of English language competence as confirmed in

 their English language qualification/evidence submitted when applying to

 study at the university, and they show they understand all questions and

 information without the use of translation software or an interpreter, and;

 4.1.2 Where the applicant confirms they have made/will be making

 accommodation arrangements to live locally within 2 weeks of the meeting

 and;

4.1.3 Where based on the responses provided during the interview, the

 interviewers are satisfied that the applicant has a genuine intention to

 study.

4.2 **Enrolment permitted on the condition of an action plan:**

4.2.1 Where the Panel is not adequately assured that the applicant has

evidenced 4.1.1. and / or 4.1.2 and/ or 4.1.3 above the applicant may be permitted to enrol on the condition that they engage with a detailed action plan which will include further meetings with the Immigration Compliance Team, close monitoring of attendance and liaison with the school regarding progress.

4.2.2 This action plan should span the first term. Once signed by the applicant,

 the action plan will be emailed to them to remind them of the

 agreement they must follow to prove to the University they have a genuine

 intention to study and will be monitored by the Immigration Compliance

 Team.

4.3 **Enrolment is prevented:**

4.3.1 Where the panel concludes on the basis of evidence and recommendations

 from the interviewers that they are not satisfied the applicant has a genuine

 intention to study; or their spoken English language capability and

 comprehension is insufficient for their level of study, or their language

 capability does not match the standard confirmed in their English Language

 qualification/evidence, the applicant will not be permitted to enrol.

4.3.2 The Immigration Compliance Team will write to the applicant with interview

feedback and confirm the panel’s decision, with details of how to request a reconsideration of an immigration compliance decision and /or the outcome of an Intention to Study Assessment interview’. This must be submitted within 7 days of the date of the decision/outcome.

4.3.3 A report will be made to UKVI to confirm the applicant has not been

 permitted to enrol and the University is withdrawing sponsorship. This will

 result in the cancellation of the applicant’s visa.

1. **Possible outcomes for Students**

**The Panel may agree one of the following outcomes:**

* 1. **Continuation of studies is permitted**

 5.1.1 Where the student is able to respond to the interview questions

with the expected level of English language competence as confirmed in their English language qualification/evidence submitted when applying to study at the university, and they show they understand all questions and information without the use of translation software or an interpreter and;

 5.1.2 Where the Student confirms they have made/will be making

 accommodation arrangements to live locally within 2 weeks of the meeting

 and;

 5.1.3 Where the interviewers are satisfied that the student has a

 genuine intention to study.

* 1. **Student is investigated under the Policy on the Use of Fraudulent, False, Incorrect or Misleading Information to Gain Admission to the University.**
	2. **Student is Investigated under the Student Disciplinary Procedure**
	3. **Withdrawal from programme of study**
		1. Where the panel concludes on the basis of third party evidence from organisations or departments including UK Border Force, UKVI, Immigration Enforcement Team and feedback from the interviewers that they are not satisfied the student has a genuine intention to study; or their spoken English language capability and comprehension is insufficient for their level of study; or their language capability does not match the standard confirmed in their English Language qualification/evidence, the student will be withdrawn from their programme of study.

 5.4.2 The Immigration Compliance Team will write to the applicant to confirm the

outcome of the interview and panel decision. The Student will also be sent details of how to request a reconsideration of the decision which must be submitted within 7 days of the withdrawal notification.

5.4.3 A report will be made to UKVI to confirm the Student has been withdrawn

 and that the University is withdrawing their sponsorship. This will result in

 the cancellation of the Student’s visa.

1. **Action plans**
	1. Where it is appropriate to devise an action plan, the Applicant/Student must sign to confirm that they understand what is expected of them and agree to the required actions.All action plans will involve follow up meetings with members of the Immigration Compliance Team, to track engagement with the agreed plan. Attendance at these meetings will be compulsory.
	2. Students will be monitored against their action plan over the length of a term. At the end of this period, if the student has fully engaged, no further action will be necessary.
	3. Where students fail to fully adhere to the action plan, a report with recommendations, will be sent for review to a panel consisting of the Director of Global Engagement or nominee and the Chief Marketing, Communications and Student Recruitment Officer or nominee.
	4. Where the review concludes that the student does not have a genuine intention to study, the student will be informed in writing, they will be withdrawn from their programme of study and a report sent to UKVI to confirm the University is withdrawing sponsorship. This will result in the cancellation of the student’s visa.