

Qualifications Fraud

Policy and Protocol for Response and Prevention

Important information regarding this document

The overarching responsibility, oversight and review for the policy and protocol in relation to the response to and prevention of admissions fraud lies with the Director of Student and Academic Services, University of London.

This Protocol was approved by the University of London's Senior Leadership Team (SLT) on 23 March 2021, and took effect from 1 April 2021. This version of the document supersedes any previous versions.

Equality Impact Assessment

A departmental assessment affirms this policy as neutral in terms of equality-related issues.

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TABLE OF CONTENTS

INTRODUCTION AND POLICY OVERVIEW.....	1
SCOPE AND STAKEHOLDERS.....	1-2
PRINCIPLES.....	2-3
OUTLINE PROCESS FOR INVESTIGATION AND RESOLUTION.....	3-5
Determining the validity of the case.....	3
Steps for handling qualifications fraud cases.....	3-4
Onward reporting of outcomes and action.....	4-5
RECORD-KEEPING AND PREVENTION OF QUALIFICATIONS FRAUD.....	5
CONTACTS AND RESOURCES.....	6



INTRODUCTION AND POLICY OVERVIEW

1. The University of London (UoL) takes instances of qualifications fraud in respect of its awards and graduate documentation seriously. Graduate documents are tangible legal documents, and the prevention of such fraud is a priority for the University. This document outlines the University's policy, protocol and approach to prevent and respond appropriately to qualifications fraud to mitigate its impact, including that on the University's reputation.
2. This policy and protocol have been produced by UoL to provide guidelines and best practices to enable UoL colleagues to:
 - address qualifications fraud of UoL awards and courses in a systematic and timely manner
 - prevent qualifications fraud
 - share good practice with the sector
3. In producing this document, UoL consulted Prospects, Higher Education Degree Datacheck (HEDD), which was launched with funding from the Higher Education Funding Council for England (HEFCE). In addition, existing good practice and other sector guidance alongside cases previously handled by the University and other HE case studies have informed relevant aspects of the protocol.
4. Qualifications fraud is different from assessment offences, in that assessment offences include plagiarism and offences related to examinations and coursework. For guidance on handling allegations of assessment offences, please use the following link:
https://london.ac.uk/sites/default/files/governance/procedure-for-allegations-of-assessment-offence_0.pdf

SCOPE AND STAKEHOLDERS

5. Under the Fraud Act 2006 section 2, it is an offence to make a false representation with the intention of making a personal gain, causing a loss to someone else or exposing someone else to the risk of loss. This policy and protocol apply to qualifications fraud, also referred to as degree fraud, covering:
 - Misrepresentation
 - Forgery
6. Qualifications fraud can be committed by individuals (e.g. course applicants, students, alumni and job applicants) as well as organisations (e.g. fake certificate websites and degree mills).



7. The fraud may be intentional or unintentional. Irrespective of this, qualifications fraud is a serious offence, and can be subject to legal action and imprisonment.
8. The University may become aware of instances of qualifications fraud through various channels including an employer, recruiter, alumnus/alumna, member institutions, recognised teaching centres and via online platforms such as LinkedIn. Occasionally, individuals not linked to the UoL may also contact UoL. This may be to request the verification of fake graduation documentation that they claim to have been issued by UoL, or certified copies of such documentation.
9. UoL teams that are likely to encounter instances of qualifications fraud, and may have responsibility to address them include:
 - UoL Worldwide: Admissions, Registry, Diploma and Transcripts, Marketing, Public Relations
 - The VC's Office: Legal Services, Development Office, HR, Communications
 - ICT and CoSector
10. The Resources and Contacts section lists external bodies that can be contacted for further advice and to report fraudulent organisations.

PRINCIPLES

11. The investigation and resolution to qualifications fraud must be premised on:
 - **Timeliness:** As soon as an instance of qualifications fraud is suspected or evidenced, appropriate action must be initiated.
 - **Communication:** Relevant teams must keep open channels of communication and contact appropriate UoL colleagues to discuss next steps, action and review. Where necessary, member institutions and recognised teaching centres must be informed or consulted.
 - **Confidentiality:** Confidentiality must be maintained throughout the process. Information regarding the case at hand must be discussed on a need to know basis only.
12. Where possible and appropriate, a single point of contact and response must be maintained with the parties involved, including the informer/enquirer.
13. The Director of Student and Academic Services and the Director of Operations of UoL Worldwide will be made aware of all qualifications fraud cases at the start of the enquiry by the Head of Transcripts and Student Records.



14. The Head of Transcripts and Student Records maintains a register of all qualifications fraud cases. Any lessons learnt will inform updates to this policy by the Senior Project Manager: Student Services.

OUTLINE PROCESS FOR INVESTIGATION AND RESOLUTION

15. UoL categorises qualifications fraud cases as follows:

- Misrepresentation – by an individual
- Misrepresentation – by an organisation
- Forgery – by an individual
- Forgery – by an organisation

16. Qualifications fraud needs to be dealt on a case-by-case basis.

Determining the validity of the case

17. Where fraud in respect of a UoL award and/or graduate documentation is suspected:

- The UoL officer {e.g. Admissions, Development Office, Marketing, Communications} (see section 9) contacts the Head of Transcripts and Student Records with a description of the case and request for verification of documents and/or records.
- The Head of Transcripts and Student Records checks the authenticity of the claim by crosschecking with the records held by the Transcripts and Diploma Production units.
- There are two possible outcomes:
 - a. **No qualifications fraud is detected:** If the award and/or graduate document is confirmed as being authentic, the Head of Transcripts and Student Records will inform the UoL officer. The case may require further checks in respect of non-qualifications fraud. The Transcripts Office may keep a record of the enquiry for monitoring and lessons learnt purposes. The investigation may be recorded on the individual's file.
 - b. **Fraud is detected:** If the Transcripts Office has confirmed that the award and/or graduate documents are fraudulent, the following procedure will apply.

Steps for handling qualifications fraud cases

18. Below is a protocol and basic checklist that UoL uses to deal with qualifications fraud cases. The approach depends on whether the offending individual is linked to UoL (a current student or graduate of UoL), or not linked to UoL.



A. Fraud committed by current students and graduates

If the case relates to a current student or a graduate:

- i. The Head of Transcripts and Student Records investigates the case in the first instance and respond to the third party. Thereafter, the Head of Transcripts and Student Records passes on the case to the Associate Director: Student Affairs for investigation.
- ii. The Associate Director: Student Affairs issues a cease and desist letter* to the student or graduate. This letter is agreed and signed by the Director of Student and Academic Services.
- iii. The Associate Director: Student Affairs informs the Head of Transcripts and Student Records: of the outcome of the case.

B. Fraud committed by individuals not linked to UoL

If the case relates to an individual who is not linked to UoL:

- i. The Head of Transcripts and Student Records liaises with the Director of Student and Academic Services to identify appropriate action.
- ii. Certain cases may require escalation and/or police involvement. The Head of Transcripts and Student Records involves the Director of Student and Academic Services in such action.
- iii. The Head of Transcripts and Student Records may require to issue a cease and desist letter* to the individual, as agreed and signed by the Director of Student and Academic Services.

* *HEDD provides helpful templates for cease and desist letters in its [toolkit for higher education providers](#).*

Onward reporting of outcomes and action

19. The Head of Transcripts and Student Records is responsible for informing the enquirer who alerted UoL of the suspected fraud of the outcome of the case.
20. In case of enquiries originating from a verification or confirmation of awards agencies, the Head of Transcripts and Student Records would inform the agency of the outcome of the UoL investigation. It is up to the agency to inform relevant parties, including the police and employers, depending on their policy and the nature of the fraud.
21. For enquiries contracted by a body responsible for the prevention of crimes or a government authority, such as the Home Office, UK Border and Immigration Agency and the NHS, the UoL investigation may form part of a larger crime investigation. In such cases,

an officer from UoL (e.g. Director of Student and Academic Services, Head of Transcripts and Student Records, Associate Director: Student Affairs) may be required to provide a statement on behalf of UoL in writing or at a Tribunal.

22. Relevant UoL PR and Communications team(s) draft any press releases. This may, for example, be necessary for cases involving public figures or government bodies.

RECORD-KEEPING AND PREVENTION OF QUALIFICATIONS FRAUD

23. The Head of Transcripts and Student Records registers the case outline and outcome for future case reference.
24. The Head of Transcripts and Student Records communicates policy update requirements to the Senior Project Manager: Student Services, who records the lessons learnt and maintains an up-to-date policy and protocol for the response to and prevention of qualifications fraud.
25. To help prevent qualifications fraud, students and graduates must be aware that replacement certificates can only be obtained from UoL, and under no circumstances they should attempt to recreate the certificate themselves, nor purchase one from a 'replacement certificate' website. Students must only trust documents issued by UoL's official channels. For a replacement certificate, please contact the Head of Transcripts and Student Records.
26. Recognised teaching centres, students and alumni are forbidden from posting photos or scanned copies of their degree certificates and transcripts on social media. Whilst students from other distance and online education organisations may encourage their students to post their qualifications and achievements online, UoL forbids this for security reasons. UoL monitors its websites and social media sites. Offending posts may be recorded, and need to be taken down immediately.
27. UoL engages with regulatory bodies such as HEDD, which maintains a database of bogus providers and has a repository of fake certificates. UoL passes information on qualifications fraud discovered at UoL to HEDD as may be appropriate and beneficial for the sector.



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CONTACTS AND RESOURCES

Higher Education Degree Datacheck (HEDD)

Web link www.hedd.ac.uk
Reporting form www.hedd.ac.uk/contactUs.htm
Fraud helpline 0845 077 1968

HEDD Degree fraud advice for higher education providers

<https://luminare.prospects.ac.uk/media/8b902615-cf3f-4856-bcaa-871d08f732d4/advice-and-guidance-on-degree-fraud-for-he-providers.pdf>