



UK Council  
for International  
Student Affairs

Tier 4 Credibility Interviews  
UKCISA survey report  
*March 2013*

UKCISA

# Tier 4 Credibility Interviews

## UKCISA survey report

### Introduction

In 2009 Tier 4 of the Points-Based System was introduced, requiring international students to qualify for visas on the basis of a set of objective and transparent criteria, demonstrated by documentary evidence of the required funds, level of English and academic ability as assessed by what are now required to be Highly Trusted Sponsor (HTS) institutions. Entry Clearance decisions were therefore made on objective criteria rather than the subjective judgements which had caused such controversy in the past.

It was also made clear that it was for academic institutions to assess academic ability and that apart from universities who were able to use their own tests, language proficiency was to be proved by achieving required standards in UKBA approved 'Secure English Language Tests' (SELTs).

Since this regime has been fully in place, sponsors have as far as they are able given significantly increased attention and priority to ensuring only legitimate and credible students receive offers, not least because their Tier 4 licences now depend, amongst other factors, on no more than 20% of offers made resulting in visa refusals.

Following a number of apparent concerns that there still could be students applying, and possibly being eligible, for visas on the basis of points theoretically scored, the Home Office undertook a pilot study<sup>1</sup> to examine the potential impact of introducing new powers to refuse applications on grounds of credibility. Then in July 2012, it introduced such powers and instituted a limited programme of 'credibility' interviewing covering some 5% of student applications. Institutions were told, however, that as this was still a pilot and a system under development, refusal numbers from these interviews would not count in this first year against HTS licence criteria.

It was therefore a complete surprise when the Home Secretary announced in December 2012 that after so much investment in the objective points-based system and institutional compliance, up to 100,000 students would now be interviewed – a figure which we understand to mean that virtually every single student applicant apart from those deemed 'low risk nationals' will receive at least an initial interview by video-conference.

Whilst the sector welcomes and relies on Entry Clearance Officers' efforts to spot areas of clear abuse such as forgery of documents, missing qualifications, false identity, potential money-laundering, etc, it is very concerned about a number of aspects of this new 'credibility' interviewing system:

- the general message that this gives to international students that whilst they may be eligible under the published criteria, there is another set of **unpredictable and subjective standards** against which they must now qualify and that this may well put off many from choosing the UK

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<sup>1</sup>Home Office (2012) *Tier 4 student credibility pilot analysis of quantitative and qualitative data* accessed at <http://www.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/immigration-asylum-research/occ104/> on 19.3.13

- that these standards relate to a number of areas and especially around 'intentions' which are notoriously **difficult to assess with any certainty** – future career plans for a student starting on a degree course, reasons for choosing one institution over another, choice of one subject over another, motivation for coming to the UK, etc
- that many of these factors have already been considered, *as far as it is possible*, by institutions before offers were made and that this merely **duplicates a process already undertaken by institutions** which are supposed to be Highly Trusted
- that many young people and especially from some cultures, may **find this sort of interview intimidating** and have difficulty answering questions adequately, in a foreign language, in such circumstances although they do have the English language skills for academic study
- that as judgements are being made 'subjectively' it will be difficult if not impossible in most instances to **overturn a decision through the Administrative Review** process and
- that the **process of applying for a visa will now become even more extended** (and in due course doubtless expensive) making it difficult for many to obtain visas in the three month window before the start of their courses

This survey was therefore designed to gather evidence from sponsor institutions of the scale of interviewing undertaken over the first nine months of the new system and the reasons given to students whose visas were refused as a result.

The findings suggest that in many cases institutions, let alone students, found these reasons either difficult to accept as fair, unsound in principle, arbitrary or at the very least contentious.

Many commented that this was not perhaps entirely surprising as they were, of course, based on 'subjective judgements' by one individual as opposed to 'objective criteria' on which the current system had been built. It is difficult to see therefore how many of these decisions – and so many more in the future – will not be equally controversial and lead to widespread disquiet and concern amongst both institutions and applicants.

Whilst it is accepted that these 100,000 interviews annually will now be rolled out, it is hoped that as a result of this report UKBA will

- note those aspects which generate most concern
- re-visit the criteria being used and
- exercise extreme caution when making these subjective judgements which will have such profound effect on students' lives.

## The survey responses

In advance of this extension of credibility interviewing to a very large proportion of Tier 4 applicants, we sought feedback from UKCISA members about their impressions of how the system is working, and any current areas of concern. This report summarises institutions' responses to our survey, and the potential lessons to be learned.

The survey was circulated via the UKCISA e-news, the British Universities International Liaison Association (BUILA) mailbase, the Association of Colleges International Briefing and the Study UK newsletter. This ensured potential coverage of publicly-funded and private colleges and universities across the UK. We received 83 response to the survey, as follows:

Institution type	Total
Higher Education Institution (publicly funded)	45
Higher Education Institution (private sector)	12
Further Education College (publicly funded)	16
Further Education College (private sector)	7
Independent School	2
English language college	1

This is a relatively small sample, and the examples quoted here are therefore illustrative, rather than claiming to be representative of the sector as a whole.

## Frequency of credibility interviews

More than half of respondents reported that some of their students had been called for credibility interviews since 30 July 2012. For a quarter, fewer than ten students were affected, but one in ten respondents had had 40 or more students called for interview.

Figure 1

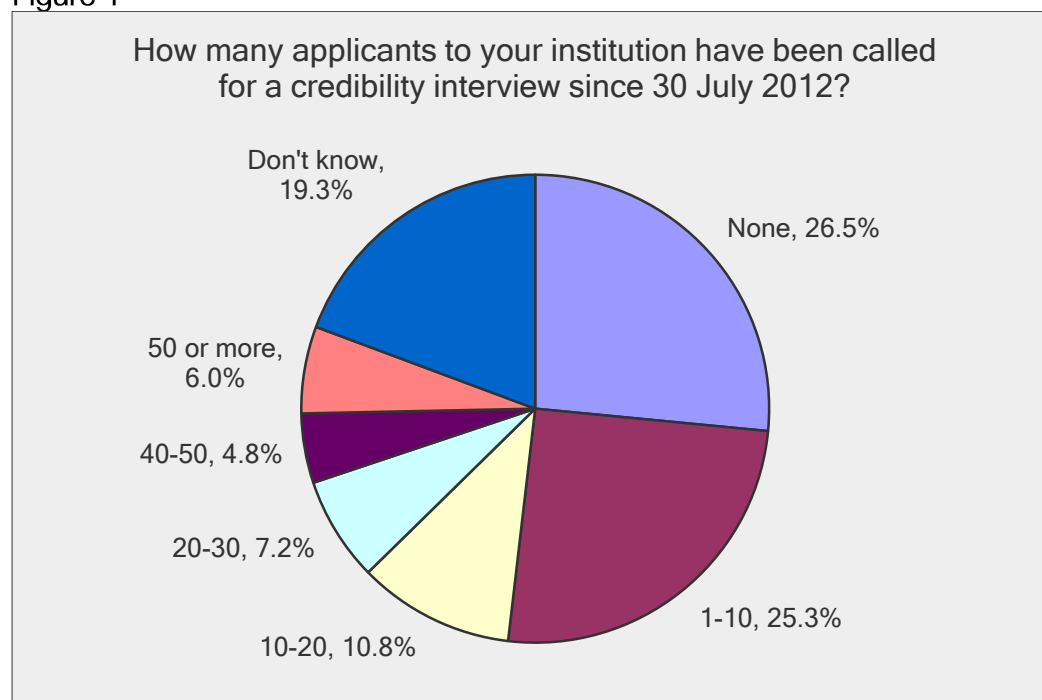
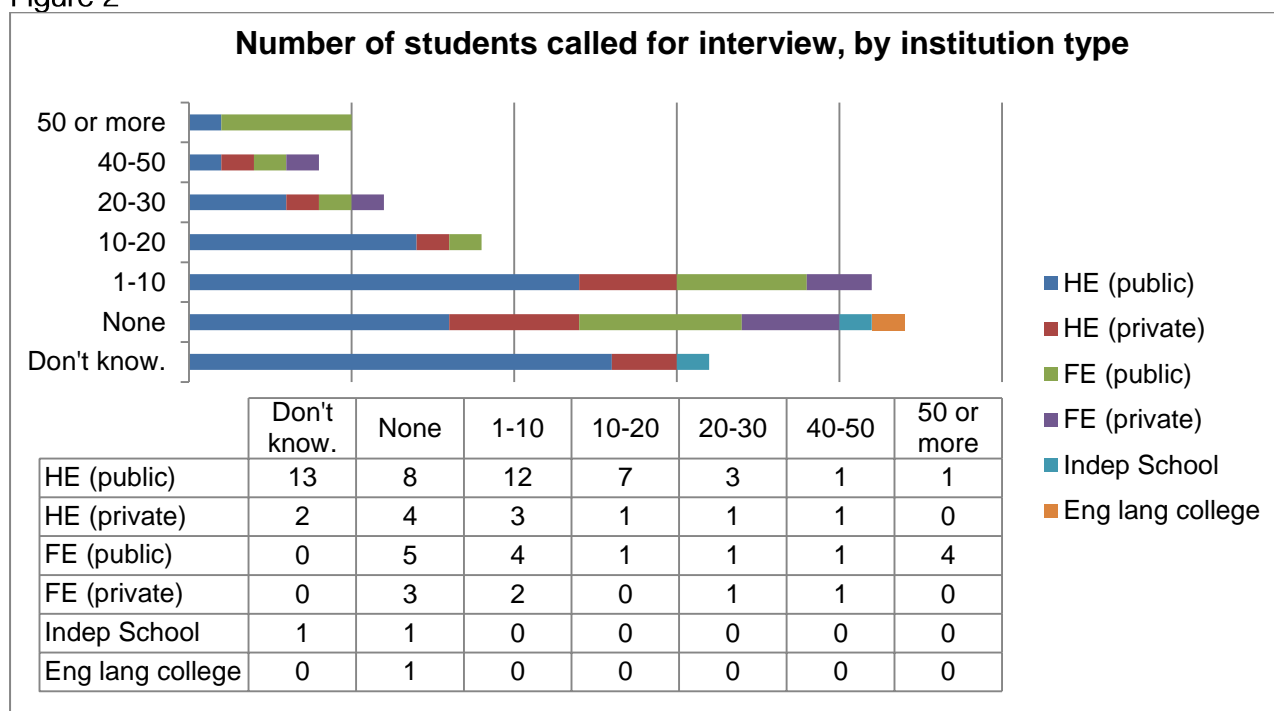


Figure 2 below shows a further breakdown of this distribution by institution-type. It is notable that in this small sample public sector FE colleges appear to have had disproportionately high numbers of their applicants called for interviews, given the relative size of student populations at FE colleges compared to universities. This also matches anecdotal evidence that colleges have been particularly targeted, suggesting that 'risk profiling' is occurring, based among other criteria on type of institution or course level.

Figure 2



## UKBA guidance on credibility interviews

In order to analyse the responses about reasons given for refusals, it may be helpful first to set out the criteria set out for credibility interviews.

UKBA's guidance for entry clearance staff<sup>2</sup> instructs Entry Clearance Officers (ECOs) first to consider the objective requirements of Tier 4 (a valid CAS and appropriate financial evidence), and then the general grounds for refusal (not speaking English to the 'required standard' and using false representations). Only if the applicant has not been rejected under any of these rules should an ECO consider a rejection on credibility grounds.

Key points from the guidance include the following (our emphasis):

8. In assessing whether the applicant is a genuine student, entry clearance officer [sic] must consider the application in the round, taking into account all the following factors and **any other relevant matter, including the education provider's decision to issue a CAS**, and decide whether they consider, based on their expertise in assessing entry clearance applications and the evidence available to them, whether the applicant meets the requirement of paragraph 245ZV(k) [the genuine student criterion]

...

<sup>2</sup> STY02 - Tier 4 - interviews and genuine student rule (GSR) accessed online at <http://www.ukba.homeoffice.gov.uk/policyandlaw/guidance/ecg/sty/sty2/> 19.3.13

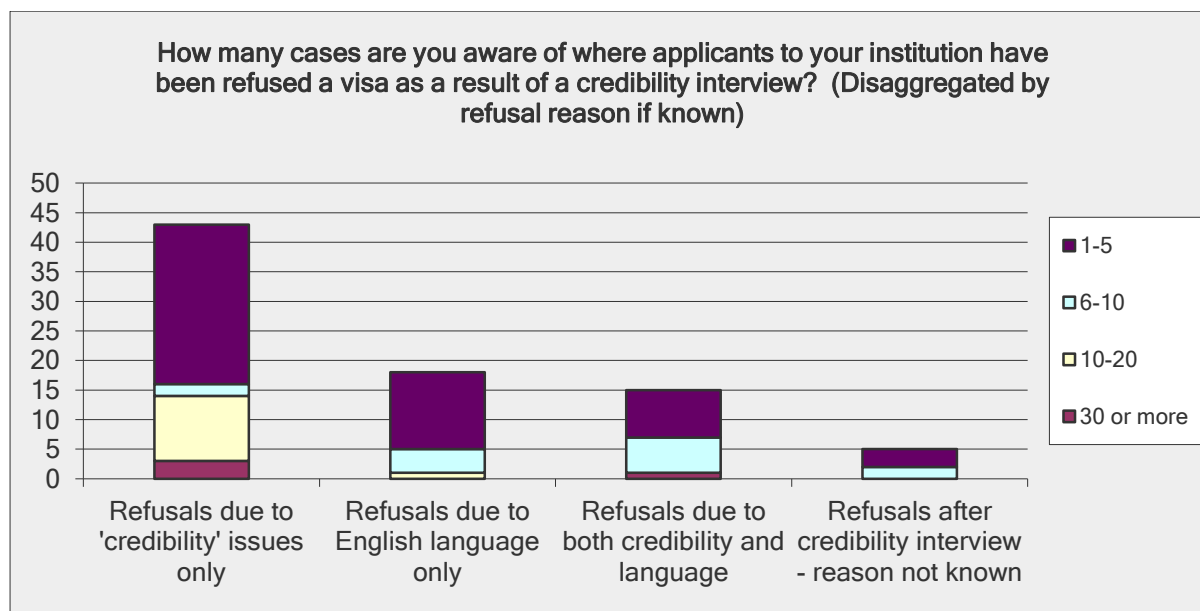
Whether the applicant has the academic ability to study the proposed course is not a relevant consideration for the entry clearance officer and should not form part of any conclusion reached. The academic ability of the applicant is a judgement for the sponsor to make with the benefit of its educational expertise. Similarly the fact that the course does not represent academic progression is not a decisive factor in this consideration.

The relevance of the course to post-study plans, or vagueness about the nature of post-study plans, should not be used as a sole reason to refuse an applicant, rather it will be one of a range of factors to be considered in the round in assessing whether the student is genuine. In this context, whether the course will add to the applicant's employability or whether the course could be undertaken more cheaply in the applicant's home country should not be considered.

For those considered to be genuine students, intention to leave the UK at the end of the course is not relevant as there are many bases on which an individual could lawfully remain in the UK.

## Survey findings about refusal reasons

Respondents were asked about the numbers of refusals on credibility grounds, and on English language. The largest numbers of refusals appear to have been on credibility grounds, both in terms of the numbers of students and the proportion of responding institutions affected. A number of respondents attributed refusals to both credibility and language issues, although the guidance clearly states that if a student is refused on the standard of their English, they should be refused on this grounds alone. However, respondents may have meant that their students collectively were receiving refusals on both grounds, rather than individually, so this finding is unclear.



In the open section of the survey, respondents were asked to comment on the main reasons for refusals. The following were the most commonly mentioned reasons – and often a combination of these were cited. Most of these reasons are potentially in line with the guidance. However, this is where the difficult territory of subjective judgements comes into

play, and we offer here some examples of where respondents commented that the refusals ostensibly made on these reasons might not be justified:

## 1. Insufficient knowledge about the course or institution

Respondents' concerns were primarily that ECO's expectations about students' knowledge of the course appeared to be unreasonably high, or insufficiently flexible to take account of the circumstances of the individual student and the nature of the proposed course. Students seemed often to be expected to know large amounts of detail about modules, assessment plans, and the institution eg facilities offered, location of campuses and accommodation.

Guidance from the institution in preparing for the interview, or students taking course details with them, could be misinterpreted by ECOs as an attempt to cheat the system, rather than as reasonable preparation.

- “ Lack of detailed knowledge (i.e. syllabus) about the chosen course of study. Many students, particularly UG, do not necessarily have a clear idea as to what the course entails. In many cases they are seeking a degree in a subject area and are not expecting to specialise at this point.*
- “ Each student was asked to give details of their course, as such we see this as a running theme; concern here is that if we 'coach' or give further information to students about course content that the ECO would again call into question the student and possibly the institution? A catch 22. We would query whether home students have this depth of knowledge at this point in the recruitment cycle.*
- “ A lot of students complained that even though they did thorough research on the course and institutions, this was not deemed enough.*
- “ I am aware of several students who were refused visas based on their inability to give specific module content for a generic undergraduate foundation programme.*
- “ refusal based on the fact that students could not provide an address where he is going to live in the UK*

## 2. Insufficient research into alternative courses in the UK or the student's home country

Respondents similarly queried the appropriateness of ECO's expectations about the process by which students choose a course and institution, and why it should be a default expectation that multiple options should have been researched in depth, rather than recommendations accepted from friends, family or agents.

- “ The questions and expectations of the officers in some countries do not take into account the cultural background of the students being interviewed. Agents in many countries play a very important role in the decision making process and students rely a great deal on what the agent tells them. They are not as independently minded as students from the UK and Europe, where students would do a lot of research into their option and in the decision making process, concerning course selection.*
- “ Lack of research into alternative courses and providers and explanation as to how and why the student decided to join this college. Why are students expected to do a wide search of courses and providers? Many simply accept recommendations from friends and family as sufficient.*

### 3. Judgements about intention

Refusals were frequently attributed to the ECO not being satisfied about student's intentions after the course and future career plans, including whether the proposed course would lead to the specified outcomes, or not having clear plans, or whether it represented a sufficient return on investment

Intention lies at the heart of the notion of credibility testing, and is particularly hard to pin down when students are on an educational journey, the outcome of which they cannot predict at the start. The comments suggest that in some cases, there is a presumption of guilt applied to students on the basis of factors such as family income or having family in the UK, or the type of institution and/or course which they plan to study, which it can be extremely hard for students to counter.

- “ Lack of explanation as to intentions and reasons for coming to the UK to study. Students have many and various reasons. Are ECOs qualified to distinguish those which are right and which are wrong? Isn't this very subjective?*
- “ One stated that they didn't believe the (17 year old) student when they stated they wished to return to work in their family business upon completing their course, because they didn't believe they would as they had not worked there in the past... despite the fact the student had been in full time education!*
- “ Subjective doubts about intention appear to be a common factor. Also, most of our applicants are not "the brightest and the best", and although we are as sure as we can be of the applicants' ability and intention to study, ECOs appear to be sceptical of these "non-Russell group" students.*
- “ I have seen some of the refusal notes through our agents and reasons are mainly for 'inconsistent answers'. These 'inconsistent' answers mainly involve family members already residing in the UK and motivation for study.*
- “ Refusal notice stated that the UKBA did not find it credible that the student in question was to leave her job in China to undertake pre-sessional and Masters study in the UK only to return to the same employer and the same job role. It was claimed that the student read from notes during the interview prepared from the internet.*
- “ Student stated that on completion of the course they wanted to study for an MBA, but UKBA could find 'no evidence to show that the completion of this course will enhance your future.'*
- “ Asking applicants for their plans after completing is also difficult because part of education should be the opening of new opportunities. Not all students will have concrete plans for post-graduation and I question the extent to which this is a strong indicator of low credibility - yet it has been used as a basis for refusal.*
- “ We had one refusal based on the student future study plans not for what the actual CAS was for, the student was questioned about intended study pathway and because that was not fully known as it was dependant on first course of study the application was refused.*

#### 4. Gaps in study

A number of respondents felt that ECOs did not sufficiently understand that a gap between study is a relatively normal occurrence, which can occur for all sorts of good reasons, and is sometimes a requirement in terms of gaining work experience prior to further study – or indeed working to earn the money for further study.

- “ *Students have been refused on credibility interviews because they had not studied in the past few years and the officer didn't think that they are credible for wanting to return to study.* ”
- “ *The entry requirements of our MBA course at that time included 3-year work experience due to the nature of the course. Therefore nobody could be accepted on our MBA course without work experience i.e. “a gap in studies”.* ”
- “ *Refusals based on a gap between studies and application to come to UK even though students were able to show substantial work experience.* ”
- “ *Gap in education since previous studies (approx 1 year).* ”

#### 5. Career changes

Several respondents mentioned rejections because students wished to change career path. This is clearly a particular aspect of the “intention” issue.

- “ *One student was found to be not genuine because of a 'career' change, they had been studying science related subjects and wanted to change to Business.* ”
- “ *Applicant had a degree in medicine from Pakistan and the ECO did not think it appropriate for her to change careers as she had applied for the MBA programme* ”

#### 6. Progression issues

The guidance notes that “the fact that the course does not represent academic progression is not a decisive factor in this consideration”, suggesting this should not on its own have been used as a reason for rejection. Respondents raised a number of examples where questionable decisions had been made about progression:

- “ *Several students were refused on the basis that they finished school the year before they tried to come to study in the UK and their studies here could therefore not be relevant (e.g. student has HSC Business from 2011 from Bangladesh and wants to do a HNC Business management course in 2012 which according to the ECO is completely irrelevant to previous studies)* ”
- “ *I am aware of 1 student being refused on grounds of the PGCE was not seen as academic progression from a UK MSc. The student was unable to train as a teacher without the PGCE but visa refused on progression of NQF 7 to NQF 7* ”
- “ *The following reason was stated on a refusal for a Level 3 International Foundation Programme designed specifically to allow students to get the correct level qualification and experience to progress to Higher Education: "You state that on completion of this course you will seek admission to university but there is no evidence to show how completion of this course will enable you to do this."* ”

- “ ECO stated that MBA studied in Pakistan was same level as MBA studied in the UK. According to NARIC an MBA in Pakistan is equivalent to UK degree level therefore this was not correct.
- “ I am concerned that this reintroduced a high degree of subjectivity to the application process - in particular on academic progression issues (these could sometimes be resolved through enquiry with institution)

## 7. Absence of previous immigration history

It appears to go against the principles of natural justice for a student to be refused for not having a previous immigration history, but it appears this has been used for a justification on the grounds of not having evidence of having complied with any country's immigration rules.

- “ We have also seen on a refusal notice "Your passport that you have presented with your application does not show any previous travel outside Pakistan, therefore does not demonstrate any previous compliance with the immigration rules of another country."

## 8. Maintenance issues

The main complaint in relation to funding was that students had met the published objective criteria, but were now being subject to additional subjective judgements about the credibility of their funding sources, including whether parental or other family income was sufficient, and reasons for large deposits having been made in the student or parents' bank accounts

If students were attending for interview with no expectation of being quizzed on, for example, sources of funding for a second year's study, or evidence to support the source of lump sum payments into bank accounts, it may have been hard for them to respond adequately on the spot. The guidelines state that financial circumstances should be judged on "whether the applicant has a credible income source". It would save applicants from needless rejections if this criterion could be more clearly spelled out.

- “ Many make reference to finances and the student's family situation and will state reasons such as "Your income is \*\*\* and the cost of the course is \*\*\* therefore I am not satisfied that the substantial financial investment or outlay is commensurate with your family's personal and financial circumstances".
- “ Financial plans while living in London (for example, an uncle would give support but on the basis that he also supports a family, expense was "not proportionate to his economic circumstances").
- “ One refusal was on the basis that the UKBA didn't believe the course was a good use of the money the student's father had left her... but that was eventually overturned.
- “ Not accepting a valid bank statement because a large single amount was deposited in the account to meet the maintenance fees even though the student has already paid the tuition fee for the first year in full. ECO not recognising that a student still has established presence and only needs to show £1600 not £7200.

## 9. Level of English not believed to be consistent with level achieved in SELT

Concerns around English centred around two issues. First, that a visa interview was an intimidating experience where students would not be at their best to demonstrate their competence in English (even leaving aside various reported practical difficulties). Second, real concern that ECOs judgements about English language were failing to match the outcomes of Secure English Language Tests, and the interviewing and testing regimes of institutions (conducted in some cases by specialist language teachers).

- “ *ECOs are not always trained to support effective communication with non-native English speakers.*
- “ *International students are very often not able to express themselves very clearly for cultural and linguistic reasons, and this may be accentuated in an interview situation.*
- “ *We are concerned that our young students may lack the confidence to present themselves well in the face of robust questioning. They are often very shy, timid and have no experience of having been treated with anything but relative deference as they are usually financially privileged and so to be questioned is likely to be a new and frightening experience.*
- “ *Also, feedback from male Pakistani student is that it was the first time he had ever spoken to a Western woman face to face, and he was extremely nervous. We are concerned that UKBA will not take this kind of thing into account.*
- “ *In one case they asked the student to explain the painting on the wall*
- “ *I am also aware of several cases of students being refused visas on the basis of their language abilities even though they had a SELT at the appropriate level for PG study - In one particular case involving a Jordanian student, he was refused a visa based on the interview on account of his English as he was unable to hear the first question he was asked by the interviewer who was sat behind a glass screen. He asked the interviewer to repeat the question but I am informed that from then on she spoke to an interpreter rather than the student and the visa was refused. The student has appealed*
- “ *Another student was interviewed in Nepal and mentioned that they had been interviewed by the University, which was in fact our own 'genuine student' test. Student was refused because this interview was seen by the ECO as an English Language test, and this was not listed on the CAS. However, the student had a valid SELT!*
- “ *We are just reverting to the old system of subjective decisions by ECOs who have no expertise in assessing English language. Are the SELTs not to be trusted after all???*

## Refusals and administrative reviews

We asked respondents how many students had asked for decisions to go to administrative review. Only four instances were quoted where a student successfully had a refusal overturned in an administrative review, though some cases were still pending. Some respondents felt the chances of getting a decision overturned were low because of the subjective nature of the decision making. One commented that reviews “appear not to have been thorough or ‘impartial’” and another described the response as “cursory”.

There was a feeling that administrative review does not work in these cases as there is no independent scrutiny, nor was it clear what direct evidence is available as to what took place in the interview. Also, in order to prove credibility, applicants invariably will need to show new evidence to strengthen their case, though it may not be clear what further evidence they could bring.

Whereas students who are refused on the points-related criteria often make a fresh application instead of requesting administrative review, either for reasons of time, or where they need to supply new evidence of meeting the criteria, students who have been refused on grounds of credibility or English are unlikely to feel confident that a second application will receive a different outcome, as it will be less clear how they could address the factors which led to a subjective refusal.

A student whose application is refused will not only have a 'black mark' on their UK immigration record, but may also find this counting against them in applying for visas to other countries. It is therefore vital to the individual that they are not refused on weak or spurious grounds.

*“ The credibility interviews are very subjective and there is no way for the student to prove that they have answered the ECO's questions in a satisfactory manner, especially when they refer to research about the institution/course etc. Any refusal on credibility is highly damaging for the student as we would be less inclined to issue him another CAS because of high likelihood that they would be refused again for the same reason.*

## General concerns about the credibility interview system

Moving away from the reasons for refusal, to the system of credibility interviewing in general, respondents main concerns were:

1. **Subjectivity** of ECO decision-making, undermining the supposedly objective nature of the points based system, with the process being unfair for students and sponsors.

*“ As above, I understand that the PBS was intended to introduce a more objective system of assessing student credibility. The credibility interviews reverse this position and without firm criteria for assessing matters such as knowledge of course, it is almost impossible for a student to know whether they have sufficient information to pass the test because the UKBA could always say that the student has not given them enough detail.... I think that a transcript of the interviews should also be made available to the student.*

2. **Inconsistency** of decision making and inadequate guidance and training for ECOs, including lack of guidance in communicating with non-native speakers of English. There were several comments about ECOs making incorrect decisions about the level of qualifications, with implications for progression. Respondents also queried on what basis ECOs were using interviews as the basis for refusals on the ground of English when the student had a SELT at the required level.

*“ We interview all students via Skype and ask them questions that are used by UKBA before we issue offers, however, students still fail the interviews.*

*“ It is unclear what training or qualifications the ECOs have to make them able to decide who is a 'genuine' student and, more significantly, who can speak an appropriate level of English. We have also had a student refused for not attending the interview when they did not receive the invitation.*

3. **The nature of the questions asked**, and the level of detail expected

*“ To what extent should a credible student be able to recall specific details about a forthcoming course?*

4. **Interviews being excessively daunting** for students and not providing a suitable environment for students to demonstrate their genuineness or their English ability.

*“ The feedback from students, mainly in the Philippines, is that the interviews are less of an interview and more of an interrogation. Applicants are caught off guard and often feel nervous and uncomfortable so perform poorly in the interview. I understand that abuse of the system takes place and that the UKBA must take extra measures in certain countries but this approach means that students who have a genuine desire to come to the UK for study are being refused on unfair grounds. My other concerns are that this measure of interviews is further damaging the UK's reputation as a welcoming and attractive destination for overseas study.*

5. **Provision of appropriate interview conditions** Several respondents questioned the appropriateness of using telephone interviews, suggesting that these should at most be used for initial filtering, not as the basis for refusals. One mentioned a case where a student was interviewed from behind a glass screen and could not hear the interviewer properly. Many raised cultural issues, and how these combine with age and gender to create issues for some students.

*“ Interviews carried out in Abuja, Nigeria were by telephone, whilst those in India were in person. Tier 4 is no longer a points based system, the system is once again very subjective and raises concerns about whether an ECO should be judging students in this way.*

6. **Delays** in the process – a number of examples were quoted of where students were unable to join courses because of the time taken to arrange interviews, and others were concerned at the impact on posts where backlogs were already problematic. The speed and scale of the proposed increase in numbers interviewed has made this concern particularly acute.

*“ We have also had an instance where a student has been interviewed and the student has not been notified until after the latest start date. Fortunately, we were able to get permission for the student to withdraw his application.*

7. **Further damage to the UK's reputation**, as the whole visa process may be perceived as subjective, unfair and unwelcoming.

*“ We were told that we could ask for feedback; we have, but have received none. In the absence of any explanation or intelligence, many of the decisions appear simply unfair (and that is how applicants are beginning to perceive the whole Tier 4 process).*

8. **The impact on sponsors' HTS status** - Institutions were particularly concerned that it undermined their status as Highly Trusted Sponsors to introduce an unpredictable factor which lay outside their control, particular if refusals would be counted against them in their HTS targets. Some were considering ceasing to make offers to students which were perceived to be too 'high risk' in the view of UKBA. Others mentioned that they felt unable to issue a CAS to a student who had been refused on credibility grounds because these were so hard to challenge. Institutions clearly did not feel there was any sense of the

recently promised partnership working between institutions and UKBA towards what was, after all, a common goal.

- “ The UKBA should either stick with PBS or go back to the way things were and do their jobs themselves and not force institutions to do their jobs for them.*
- “ It would help if after interviews if there are concerns that the university where the offer is held is contacted to see how they have assessed the application.*
- “ Biased on which country and region the students are from. It has led to us rejecting students from these regions even if they have good grades etc.*
- “ This student has already been refused for a visa for one institution, and then applies to another. How can the institution know whether the same decision will be reached with a new application? if it were on the grounds of maintenance, the institution could check statements, but this decision is subjective and possible to change from ECO to ECO - which is a problem in itself.*
- “ We take our role as a HTS very serious sponsor and have rigorous admissions checks in place - we assess student's statement of purpose in detail and expect them to set out exactly why they want to study a particular course and why they want to study at our University. we also ensure that all candidates meet our English language requirements. These students have met with our requirements as a University and I cannot understand why our decisions are being undermined in this way and well qualified and serious students are being prevented from undertaking their studies with us.*
- “ If UKBA are confident that their procedures for HTS accreditation are robust, where is there a need for UKBA to add another process which could undermine both the student and the accredited HTS?*

In summary, as one respondent explained:

- “ We Skype all applicants to try to determine their credibility. We have relatively high entry criteria for an FE college. We don't issue CAS without checking bank statements first. We verify all IELTS reports. We are investing a huge amount of time in trying to make sure that all our students are genuine, and we are not sure what else we can do.*



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