

IADT Academic Integrity Policy

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Purpose	The purpose of this policy document is to outline IADT's commitment to Academic Integrity, promote good academic practice.
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1. Introduction

This policy is a revision of the previous IADT Plagiarism Policy which was developed to provide IADT students and staff with information and guidelines on ensuring Academic Integrity and help students avoid plagiarism or other academic misconduct.

2. Purpose

This policy document outlines IADT's commitment to Academic Integrity, promotes good academic practice, and instils a community of academic practice that values honesty, respect, responsibility, rigour, and fairness.

3. Scope

This policy applies to all IADT students and staff.

4. Benefits

The policy contributes to the IADT students' understanding of what constitutes academic misconduct and how to avoid this.

The policy supports and fosters academic integrity throughout IADT in concise and plain language.

5. Statement

IADT takes pride in the development of students' academic scholarship. We seek to foster the learner's skills development, including evidence of their independent thought, critical thinking, the consistent application of core methodologies appropriate to each discipline, in order that reference other people's ideas are clearly evident. These skills demonstrate Academic Integrity.

IADT is committed to fostering an academic environment that values equality, diversity, and inclusion. Our academic integrity policy is designed to ensure fairness and equal opportunities for all students, irrespective of their backgrounds, experiences, or identities. We recognise the diverse needs of our student population and are committed to providing a supportive and inclusive learning environment for all students.

We acknowledge that members of the academic community use and build on the ideas of others in an open and transparent manner with due acknowledgement. Membership of an academic community demands intellectual and creative engagement with the ideas of others Integrity is paramount for true learning and leadership to emerge.

IADT has adopted the following definition of Academic Integrity, taken from European Network for Academic Integrity, and as adopted by the National Academic Integrity Network:

"Compliance with ethical and professional principles, standards and practices and consistent system of values, that serves as guidance for making decisions and taking actions in education, research and scholarship", European Network for Academic Integrity (2018)

When these values are not displayed, this undermines the quality and value of students' coursework, and their subsequent qualifications. It is in the student's best interests to be familiar with best academic practice, ensure the integrity of their work, and thus maintain the quality of the qualification achieved on completion of their studies.

It is the responsibility of the institution, the programme teams, and the lecturers, to ensure that Academic Integrity principles are distributed but ultimately it is the individual student, who is responsible for their academic submissions.

The policy applies to all students undertaking programmes and courses at any level for the purpose of obtaining academic credits. This policy also applies to staff engaged in the assessment of academic work which contributes to credits or an award or other forms of recognition of learning.

IADT endeavours to embed a culture of academic integrity, prevent academic misconduct and detect and manage academic misconduct when it occurs. To that end, the principles of Universal Design for Learning (UDL) including multiple means of engagement, representation, action, and expression are endorsed by this policy. Where alternative modes of assessment are used these must be done with the agreement of the relevant academic staff member.

This policy is informed by, and aligns with guidelines and information from several National and International associations including:

- Quality and Qualifications Ireland (QQI)
- National Academic Integrity Network (NAIN)
- European Network for Academic Integrity (ENAI)

This policy also aligns with several IADT Policies and Procedures. These include:

- IADT Marks and Standards
- Learning, Teaching and Assessment Statement
- IADT Learner Charter
- IADT Student Handbook
- IADT Dignity and Respect

Please see section 13 for definitions.

6. Core Values of Academic Integrity

The International Center for Academic Integrity (ICAI) defines academic integrity as "a commitment to six fundamental values: honesty, trust, fairness, respect, responsibility, and courage. By embracing these fundamental values, instructors, students, staff, and administrators create effective scholarly communities where integrity is a touchstone" (ICAI, 2021).

The values of Academic Integrity inform the mission of IADT to "inspire and enable our students to fulfil their aspirations and become unique and courageous global citizens" (IADT, 2023). Without courage, we as an organisation of learners cannot flourish. IADT strives to be a learning environment that encourages students to face obstacles with honesty, empathy, and respect; we foster courage to meet challenges, honesty in how we meet them, and empathetic respect for ourselves, our fellow students, our staff, and the wider, global community.

In addition to these values -which this policy adopts - responsibility for our scholarship, our success and the actions we take to achieve these are held by the individual and encouraged within our community. Students are ultimately responsible for their learning and the work they submit.

7. Academic Misconduct

Academic Misconduct occurs when the action taken by an individual goes against these values in an academic setting. Academic Misconduct is defined as:

"...all behaviours which contravene academic integrity. Academic misconduct is also known as academic malpractice, academic malpractice or academic impropriety.

Academic misconduct is any attempt by someone to seek unfair advantage in relation to academic activity or which facilitates others to gain an unfair advantage, or to profit from the sharing or selling of your own or others' work without permission. Examples of academic misconduct include, but are not limited to, plagiarism, cheating in any forum or form, cheating by way of falsification or fabrication, contract cheating, copy-editing, purchasing essays, impersonating a learner in an exam, sharing or selling course materials without permission". (NAIN, 2021, p.3)

Academic Misconduct can be inadvertent or intentional. Inadvertent academic misconduct can be avoided by understanding academic techniques such as referencing, appropriate citation methods, adhering to the assessment brief, attending classes, etc.

Examples of Academic Misconduct

- Plagiarism
- Cheating
- Collusion
- Fabrication of Data or Information
- Unauthorised assistance

- Exam Misconduct
- Impersonation
- Resubmission of previously submitted work without permission
- Improper use of technology
- Using references that cannot be verified
- Fabrication of External Placement Reports

Why is Academic Misconduct a Problem?

Academic Misconduct is a problem because it:

- Is unethical to use the work of others without acknowledgement
- May result in the award of grades which do not reflect a student's performance or ability
- May mean that students do not learn from the assessment task
- Devalues the work of other students
- Undermines the credibility of the programmes and the Institute

8. Plagiarism

Plagiarism is using someone else's ideas without acknowledgement. Plagiarism may occur in a variety of assessment methodologies, both traditional and practice based. It can be defined as:

The presentation of another person's words, ideas, arguments, concepts or designs as though they were your own. Plagiarism refers to all media, printed or electronic including images and software.

There are different types of plagiarism. Here are the definitions adopted by the Institute:

- Minor Plagiarism: This is taking parts of work from a source or sources and using them without
 acknowledgement in a submitted assignment. This type of plagiarism often arises because students are
 unsure how and when to reference secondary material.
- Moderate Plagiarism: This occurs when a student closely follows a source, partially changes words and phrases to disguise the end result without citation.
- Serious Plagiarism: The submission of ideas/results as part of an assignment when the student
 completing the assignment knows that all or a substantial part of the work submitted is not their own
 work

Plagiarism may take many forms and vary, both in practice and impact on learning outcomes, depending on the discipline/practice concerned.

9. Generative Artificial Intelligence

Generative AI (GenAI) tools are defined as: "AI systems that generate new data or outputs, such as images, music, or text, rather than classify or process existing data" (Gimpel, et al, 2023). GenAI tools are based on a variety of underlying AI technologies. One such technology is Large Language Models (LLMs) which are a type of machine learning model that can process and generate natural language text. LLMs are a type of generative AI because they can be prompted to produce novel text outputs based on patterns learned from large amounts of training data. GenAI technologies, such as LLMs, will naturally advance and improve over time. Further, other, new technologies will be developed to expand the capabilities of these GenAI tools. It is important for learners and staff to recognise the affordances of these tools – at a given point in time – and the implications with respect to Academic Integrity.

According to the National Academic Integrity Network (NAIN), these tools "are ubiquitous" and "are becoming widely available and embedded in many of the technologies which we use to write documents, analyse data, design presentations and to support learning. It is crucially important to understand how such technologies work and be aware of their limitations as well as their apparent strengths". (NAIN, 2023)

It is crucial to be aware of what these tools can and cannot do, as well as recognise the ethical and other concerns associated with their development and use.

"Assessment is meant to provide the student with an opportunity to demonstrate achievement of the intended learning outcomes of the module or programme, to the standard required. Lecturers often use assessment tasks as a means of helping students focus on the key knowledge and skills that they need to develop and encourage them to practice and build their confidence. It is important that students submit work that they have produced and acknowledge the sources used, as well as paying close attention to the requirements of the task and policies on academic integrity". (NAIN, 2023)

Students are advised to document the process of their work and how they arrived at the outputs submitted. Lecturers will be assessing **the learning**, the process as well as the final product.

"Academic Integrity is breached if students submit the products of GenAl as their own work without acknowledgement or without authorisation to use GenAl in fulfilling the task." (NAIN, 2023)

The if, how, and the extent to which GenAI tools may or may not be acceptably incorporated and the use of GenAI tools in formative and summative learning will be decided by the Faculty, Department, Programme Teams, and lecturers in IADT. When these (or any other tools) are utilised for the creation of academic work, they must be acknowledged and documented. In the use of Generative AI tools, particular guidance should be considered. Some of the issues to be considered in any guidance produced should include, but not be limited to, the following:

- **Critical thinking:** Students must assess the validity and applicability of any Generative AI output that is generated and should be able to effectively critique the work.
- **Context**: Students must be informed of the purpose, process and ramifications of Generative AI tool use in assessment practice.
- **Citation**: If the assessment specifically allows for the use of Generative AI tools, students are required to cite the tool's contribution to their work. This may include citing the specific tool (and version) used, along with additional content such as prompts used and the process followed.
- **Upskilling**: Training will be made available to staff and students: 'Many education systems will initially need to up-skill substantial parts of the population to help them keep up with improving AI capabilities in literacy and numeracy.' (OECD, 2023)
- Fairness: When incorporating these tools into teaching and learning, issues of inequity and access must be considered.
- **Source bias:** Be aware of bias and inaccuracy in the outputs of these tools.
- Data Privacy: GDPR and best practice standards regarding data must be considered in usage.
- **Licensing**: Be aware of the licenses associated with the output of Generative AI tools (e.g. do they have the right to share, used and build upon the output)
- **Purpose of use:** Generative AI should always be used to support learning and academic integrity in line with IADT's values and standards, and with the conceptual underpinning stated above.
- **Ethos**: Innovation in fair usage and ethical experimentation with Generative AI tools are encouraged by the institute in all disciplines to support and empower learners.
- **Consultation**: Open discussion with students and staff regarding the inclusion/exclusion of these tools is encouraged.
- **Support**: Please refer to the IADT guidelines for the use of Generative AI in Assessment.

Additionally, the European Commission has recommended the following ethical considerations in the context of Artificial Intelligence for educators (2022) and this policy endorses these considerations:

- 1. Human agency underpinning autonomy, self-determination and responsibility
- 2. Fairness including equity, inclusion, non-discrimination, and fair distribution of rights and access
- 3. Humanity we approach people with respect of their intrinsic value and not as a data object or a means-to-an-end as the essence of the human-centric approach to Al.
- 4. Justified choice transparency, knowledge, facts, and data to justify necessary or appropriate collective choices in utilisation of these tools

Generative AI is an evolving suite of tools and these guidelines should be revisited at regular intervals.

10. Detection and Investigation

IADT uses tools, such as Turnitin to support academic staff in identifying cases of academic misconduct, such as instances of plagiarism or use of generative artificial intelligence.

It is the policy of this Institute that all students submitting written submissions are required to do so using the Turnitin tool that is integrated into the Institute's virtual learning environment, The Hub [Blackboard]. The Institute reserves the right to update this tool or switch to another provider in future.

When there are questions about the authenticity of work submitted, the lecturer will discuss this with the learner and may ask for proof of process as a 'Viva' (oral defence of the thesis), oral presentation, process walk-through or other means of assessment. Further investigation is at the discretion of the lecturer.

NAIN outline approaches to dealing with academic misconduct including:

"Regulations and procedures for investigating and responding to academic misconduct are set out in straightforward language and made accessible to all members of the academic community, both staff and learners. Disciplinary procedures ensure due process for learners suspected of misconduct. The regulations and procedures identify provider obligations under GDPR legislation regarding sensitive personal information and special category data" (NAIN, 2021)

Learners subject to an investigation of misconduct have access to supports throughout the process, such as IADT Students' Union.

IADT reserves the right to utilise similarity and AI detection tools, for example Turnitin or other supporting software, being mindful of the limitations of these detection tools. The appropriate use of tools such as Turnitin will be detailed in Departmental documents such as Programme Documents or Standard Operating Procedures.

11. Sanctions

Sanctions or penalties for academic misconduct are set out in Appendix 1. These include a range of actions dependent on the severity of the misconduct (minor, moderate or serious).

Each case will include notification to the student, in person or via email, or both. Detailed records of academic misconduct cases will be held by staff and Faculty Admin offices.

A complete compendium of penalties for Academic Misconduct are outlined in <u>Appendix 1: Penalties for Academic Misconduct</u>.

Contract cheating

Recent years have seen the emergence of individuals and online companies (colloquially termed 'essay mills') that offer bespoke assignment writing services to learners across all discipline areas and award types on the National Framework of Qualifications. The use of these services is known as contract cheating.

Commercial contract cheating services include, but are not limited to paraphrasing services (to hinder counterplagiarism tools such as TurnItIn), complete essays, falsified work placement reports, research proposals, and statistical data.

The facilitation of learner cheating is a threat to the integrity, standards and reputation of Irish education and training. Legislation to address this issue was introduced in November 2019. Section 43A of the Qualifications and Quality Assurance (Education and Training) (Amendment) Act 2019 makes it an offence to:

- facilitate a learner to cheat in any way;
- advertise cheating services to learners; and
- publish advertisements for cheating services to learners.

QQI is responsible for bringing prosecutions under this section of the Act. Those convicted of an offence under Section 43A may receive a fine of up to €100,000 and/or imprisonment for a term of up to five years.

If you wish to report concerns about contract cheating or possible breaches of Section 43A of the 2019 Act, please contact QQI at academicintegrity@qqi.ie. You may also contact your Lecturer, the Students' Union or the Teaching and Learning Unit in IADT for advice if you have concerns regarding contract cheating.

12. Roles and Responsibilities

IADT procedures and supports inform students and seek to help them avoid inadvertent Academic Misconduct. The institute will incorporate academic integrity in areas such as: programme development; assessment design and implementation; pedagogical approaches; and supporting learners.

Academic Staff

Individual Academic Staff can support students to minimise incidents of academic misconduct by:

- Creating clear, relevant assessment tasks and assessment briefs linked to the Learning Outcomes of the module, written in plain English
- Going through the assessment brief in class and developing tools/resources.
- Using formative assessment, when possible, to monitor development of summative assessment tasks
- Briefing students on plagiarism and academic misconduct each year
- Developing rubrics to guide students with assessment criteria
- Wherever appropriate, offering multiple means of action and expression to student to demonstrate their learning
- Supporting students by referring them to Learning Support Services and consulting the students Profile of Needs (PONs).
- Providing clear assignment briefs.
- Including verbal or personal presentation components into the assessment strategies of modules where appropriate.

Programme Boards

Programme Boards can help minimise academic misconduct by:

- Advising on clear programme assessment strategies and accompanying module assessment strategies
- Implementing the chosen citation method across the programme
- Implementing consistent assignment brief structure across all years of the programme.
- Include in assessment tasks processes designed to test for academic misconduct e.g. assessment panels, oral examination, project presentations
- Teaching referencing skills across the programme e.g. how to conduct independent research; how to reference material from sources; how to paraphrase; how to write up references properly
- Including examples of plagiarism and/or academic misconduct in the programme handbook

Students

Students can minimise the possibility of accidental academic misconduct by:

- Informing themselves of academic misconduct and what it means in their programme e.g. reading the Student Handbook and their Programme Handbook
- Engaging in discussions with lecturers about how academic integrity can be maintained
- Ensuring they have a clear understanding of the assessment tasks
- Managing their time to deliver considered work to deadline

- Developing the appropriate research and referencing skills
- Reviewing assignments before submission to check for plagiarism and/or academic misconduct
- Using Turnitin for text matching prior to submitting an assignment, where appropriate.
- Using the IADT <u>Library</u> (particularly LibGuides on Referencing) and <u>Learning Support Services</u> to help them with their work, whereappropriate.

Investigator Role

Further investigation of a student's submission is possible through tools such as Turnitin, allowing for a student's work to be compared to their own previous submissions with regard to writing style and other technical details. An investigation of this nature can be requested by a lecturer through their Head of Department or Programme Chair. Such investigations can provide additional information but questions of academic misconduct remain an issue of judgement for lecturing staff.

The Investigator would monitor Turnitin Authorship and alert academic staff to any concerns for further investigation and keep track of incidents of academic misconduct. Additionally, any lecturer with concerns regarding student work and academic integrity can contact the investigator to generate and provide an Authorship Report for further information and investigation. The Investigator Role would be filled as part of Registry.

Reasonable Accommodation

IADT is committed to providing equal educational opportunities for all students, including those with documented disabilities and/or learning differences. Students who require accommodation due to a disability or learning difference are encouraged to contact the Disability Officer and/or the Learning Support Centre to discuss their needs and to provide appropriate documentation. Upon review of the documentation and consultation with the student, a Profile of Needs (PONs) will be generated. IADT lecturing staff will provide reasonable accommodations as guided by the Disability Officer and Learning Support staff to ensure that all students can fully participate in and benefit from the academic environment. Accommodations may include, but are not limited to, extended exam time deadlines, different or accessible formats for course materials (if possible), provision of a scribe, recording of lectures, and modified assessment formats. In appropriate instances, support from the Assistive Technologist will be provided.

It is the responsibility of the student to initiate the accommodation request in a timely manner to allow for the proper arrangements to be made.

13. Definitions

IADT adapts the <u>NAIN (2021): Academic Integrity: National Principles and Lexicon of Common Terms</u>. The following definitions refer to terms used in this Policy. A full list of Terms and Synonyms are available from above document.

Academic Integrity: Compliance with ethical and professional principles, standards, practices and a consistent system of values, that serves as guidance for making decisions and taking actions in education, research and scholarship.

Academic Misconduct: Behaviours perpetrated by individuals or institutions that transgress ethical standards held in common between other individuals and/ or groups in institutions of education, research or scholarship.

Cheating: Actions that attempt to get advantage by means that undermine values of integrity

Collusion: Undisclosed collaboration of two or more people on an assignment or task, which is supposed to be completed individually.

Contract Cheating: Form of academic misconduct when a person uses an undeclared and/or unauthorised third party, online or directly, to assist them to produce work for academic credit or progression, whether or not payment or other favour is involved.

Essay Mill: An organisation, or individual, usually with a web presence, that contracts with students to complete an assignment or assignments for the student, for a fee.

Fabrication: Fabrication in the context of research means making up data, experiments, or other significant information in proposing conducting or reporting research.

Generative AI: Generative Artificial Intelligence (GenAI) is a type of AI that utilises machine learning models or Large Language Models (LLM's) to create new content, including text, images, or music, based on patterns from existing data. The new content is generated via prompt or input from a user.

Plagiarism: Presenting work / ideas taken from other sources without proper acknowledgement.

Impersonation: Misrepresentation or impersonating an individual for the purpose of cheating.

Text-matching software: Software that searches a text-based document and provides a list of in-text similarities and references to matching sources.

Unauthorised assistance: A source of information or a method for obtaining information that has not been authorised by the lecturer or programme team.

Viva: Oral defence of your thesis or submitted piece of work.

14. Support and Information

IADT provides **information and** supports **to both students and staff** in several ways, and there are also resources available online:

- IADT Library: https://iadt.libguides.com/plagiarism
- QQI #MyOwnWork: https://myownwork.qqi.ie/
- Global Academic Integrity: https://globalacademicintegrity.network/
- NAIN: https://www.qqi.ie/what-we-do/engagement-insights-and-knowledge-sharing/national-academic-integrity-network

15. Citation Methods used in IADT

IADT uses a variety of different citation methods, listed below. Programmes use different methods, depending on the discipline.

- American Psychological Association (APA)
- Harvard Referencing Style
- Modern Humanities Research Association (MHRA)
- Modern Language Association (MLA)

References

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<u>09/NAIN%20Framework%20for%20%20Academic%20Misconduct%20Investigation%20and%20Case%20</u> <u>Management%202023.pdf</u>

QQI (2021), Prosecution of contract cheating

Appendix 1: Penalties for Academic Misconduct

Penalties and Examples (Summative Work)

In all cases of suspected academic misconduct, notification is given to the student of concerns, and a record of outcomes made contributing to the student's previous history. The lecturer's discretion is an important component of the assessment and penalisation of minor and moderate. Please reference the Academic Misconduct Protocol (Appendix 2) in conjunction with this document. Please note repeat offenses of academic misconduct will incur stronger penalties up to and including disqualification. The output of GenAl tools is classed as a source and requires citation as referred to in the tables below

Type of Academic Misconduct	Examples	Available Penalties
Minor	 Failure to cite authors or sources Paraphrasing without citation or acknowledgement of source Taking a passage of text, or an idea, and summarising it without acknowledgement of the original source Overreliance on unassimilated information and concepts i.e. copy and pasting large amounts of source material into original work, with or without citation Embedding images or artwork of another person within your original work Inappropriate use of Generative AI tools without express permission from lecturer (with or without citation) 	 Warning from lecturer with no further action Written warning with no further action Assignment awarded F - resubmission required, with no penalty on grade Assignment awarded F - resubmission required but grade capped at C Records of Minor Academic Integrity are noted at Programme Boards and individual instances are recorded on student files (in Faculty Admin Offices).

Type of	Examples	Available Penalties
Academic Misconduct		
Moderate	 Repeated Failure to cite authors or sources. Repeated inappropriate use of Generative AI tools (with or without referencing) First instance of presenting large amounts of copied work or digital assets from other sources without reference. A repeated instance of Taking a passage of text, or an idea, and summarising it without acknowledgement of the original source A first instance passing off collaborative work as your own. Using small amount of code, such as methods, classes, libraries, or APIs in your work without attribution, reference, or acknowledgement (first instance) Self-plagiarism i.e. Representing 	 Written warning via email with no further action Assignment awarded F - resubmission required but grade capped at C Assignment awarded F - no opportunity to resubmit in current year Records of Moderate Academic Integrity are noted at Programme Boards and individual instances are recorded on student files (in Faculty Admin Offices).
Serious	 previous work without reference Further repeated instances of Passing off collaborative work as your own Further repeated instances of Presenting large amounts of copied work or digital assets from other sources without reference Presenting work authored by a third party, including other students, past or present, family, friends and/or purchased from external service providers. Further repeated instances of Using a larger amount of code, such as methods, classes, libraries or APIs in your work without attribution, reference or acknowledgement (first instance) 	 Please see Academic Misconduct Protocol Module awarded F - repeat required Module awarded F - repeat module next academic year Award classification reduced Qualification reduced (e.g. Honours - > no Honours) Disqualified from institution but credits retained Disqualified from institution with credits withdrawn Records of Serious Academic Integrity are noted at Programme Boards and individual instances are recorded on student files (in Faculty Admin Offices).

Appendix 2: Academic Misconduct Protocol

Step 1

- •Lecturer suspects case of academic misconduct. The case is documented, further investigation, student is informed in person and/or in writing.
- •Lecturer consults the penalties to establish if it is Minor, Moderate or Serious academic misconduct. The relevant Head of Department may also be consulted.

Step 2

• Follow steps for each type of academic misconduct, as shown in the Protocol below

Step 3

- Outcome of the process is noted (as shown in the protocols below).
- Programme Board is informed twice a year about student academic misconduct, i.e. type, number of offences and stage of students
- End of process

2.1 Minor Academic Misconduct Protocol

Appeal Student has right to Outcome - If appeal the decision sanctions are Decision to their Head of applied, details are **Lecturer meets** No case to answer or Department; if the Minor academic noted on student **End of Process** student **Head of Department Apply sanctions for** file. Programme misconduct and Lecturer minor academic **Board notified for** disagree, the matter misconduct minor academic is referred to the misconduct. Registrar

2.2 Moderate Academic Misconduct Protocol

Decision No Outcome Head of **Appeal** case to If sanctions **Department** answer - end of Student has the applied, details convenes a process right to appeal are noted on meeting with to the Head of student and the student Faculty. **Apply sanctions for** file. lecturer. The **End of Process Lecturer meets** moderate Moderate student may be A different Head of **Programme** academic academic accompanied **Head of Faculty** Board is **Department** misconduct misconduct deals with the by a third notified of appeal moderate party, e.g. a Reclassify representative academic academic from the misconduct. misconduct as Minor and use **Student Union** protocol

2.3 Serious Academic Misconduct Protocol

Outcome Decision **HoD** convenes No case to answer If sanctions are - end of process a meeting with applied, details another HoD, Appeal the student are noted on Reclassify and the plagiarism as the student Student has moderate and lecturer. The Lecturer file. Serious use protocol the right to **End of Process** contacts student may be academic Head of accompanied OR appeal to the **Programme** misconduct Department by a third **President** Issue referred to **Board notified** (HoD) party, eg a Registrar. Full **Disciplinary Board** of serious representative meeting takes academic from the place. **Students Union** misconduct Sanctions applied