

**CMI Awarding Body Whistleblowing Policy and Procedure – Ref:
AB/POL/0013/Dec20/V04**

History

Date	Amendments made
June 2019	Thorough review of the Policy Insertion of 'History' and 'Distribution' sections

Distribution

- All Quality Managers
- All Lead Moderators
- New Partner Relationship Manager
- Customer Service team
- Assessment and Support Coordinator
- HE Partnership Support Executive
- Digital Delivery
- Quality Auditor
- CMI Centres

Scope

This policy applies to individuals who do not work for CMI, including Learners and staff at CMI Centres.

Purpose

This document aims to set out the policy for those who wish to make certain disclosures to CMI relating to:

- the development, delivery and award of CMI qualifications
- assessment arrangements on CMI qualifications
- other matters likely to be of relevance or interest to CMI in our role as an Awarding Body

Introduction

This policy details CMI's commitment to the provision of duty of care to CMI Learners and CMI Centres. CMI has a positive commitment and open approach to whistleblowing. This policy and procedure is intended to be used in line with the Public Interest Disclosure Act 1998 (PIDA) which provides protection for whistleblowing on wrongdoing. The CMI policy encourages Learners/staff at CMI Centres to raise concerns with CMI should they feel the issue would not be addressed independently by the CMI Centre.

If you are concerned about issues that you see or hear regarding CMI qualifications, usually these concerns are easily resolved by following CMI or CMI Centre policies and procedures. However, those procedures may not appear to be appropriate where:

- there is no relevant procedure;
or
- you have genuine concerns about using a particular procedure at either the outset or the end of the process;
or
- your concern is about conduct likely to harm the reputation of CMI.

It can be difficult to know what to do in this situation. You may be worried about raising such issues or you may want to keep the concerns to yourself, perhaps feeling it is not any of your business or that it is only a suspicion. However, CMI has introduced this policy to enable you to raise genuine concerns about such matters at an early stage and in the

right way. CMI would rather you raised the matter when it is of first concern, rather than wait for proof. Please also see the CMI Malpractice and Maladministration Policy and procedure.

Definitions

Whistleblowing is a term used when an individual discloses information relating to suspected malpractice or wrongdoing and/or the covering up of suspected malpractice or wrongdoing. The suspected malpractice or wrongdoing is often committed by a Learner or a CMI Approved Centre, although this is not always the case.

Whistleblowing is distinct from both complaints and employment disputes.

Complaints: an expression of personal dissatisfaction. Examples of complaints that we will normally investigate can be found in the CMI Complaints Policy.

Employment Disputes: Where a worker has a dispute about his or her own employment position or contract. If you are experiencing such a dispute you should take this up with your employer or another responsible body. CMI cannot take action over grievances of this nature.

The content of the disclosure

An individual may decide to make a whistleblowing disclosure to CMI to prevent harm or to hold an organisation to account.

Disclosing a genuine concern which, in your honest, reasonable belief, is in the public interest and suggests that wrongdoing has been committed, is being committed or is likely to be committed, could qualify for protection under PIDA. Wrongdoing includes (but is not limited to):

- a criminal offence that has been, is being, or is likely to be committed
- a person who has failed, is failing, or is likely to fail to comply with a legal obligation
- a miscarriage of justice that has occurred, is occurring, or is likely to occur
- the health and safety of an individual which has been, is being, or is likely to be endangered
- the environment has been, is being, or is likely to be damaged, or
- information relating to any of the above that has been, or is likely to be, deliberately concealed.

The CMI policy additionally covers any conduct not included above which appears likely to, or may, cause harm to the reputation of CMI.

Procedure

What should you do if you have a concern about suspected malpractice or wrongdoing?

Whistleblowing disclosures can be made in one of the following ways:

- by email to awardingbody@managers.org.uk
- through the CMI Customer Services Department on 01536 207496 between the hours of 9am and 5pm (UK time) Monday to Friday
- or by post to: Head of Awarding Body & Compliance, Chartered Management Institute, Management House, Cottingham Road, Corby, Northants, NN17 1TT

Allegations of suspected malpractice or wrongdoing may be made anonymously (via post or telephone).

What happens after the disclosure is made?

1. If you choose to make a whistleblowing disclosure to CMI, and have provided contact details, CMI will send you an initial acknowledgement that we have received your disclosure.
2. CMI will normally ask you to provide as much evidence as possible to support your disclosure.

3. CMI will conduct a full investigation (for further details please refer to the CMI Investigation policy). CMI will look into anonymous whistleblowing disclosures or pass them on to the relevant Quality Manager (where appropriate). However, it may not always be possible to investigate or substantiate anonymous disclosures.
4. CMI will consider each disclosure of information sensitively and carefully, and decide upon an appropriate response. CMI may share with third parties any information received in the disclosure where it is considered necessary to do so.
5. In most cases, CMI will keep you updated as to what action is being taken in response to your disclosure. CMI will normally send you an update within 28 working days of receiving your disclosure, but this may take longer if the issue is particularly complex.

What if I don't want to reveal my identity?

CMI very much hopes that the assurances given in this policy will encourage you to allow disclosure of your identity to those who need to know. If you disclose your identity, it will be easier for CMI to:

- Look into the matter
- Protect your position
- Give you feedback where appropriate.

However, if you wish to raise an issue anonymously, CMI will, of course, consider your disclosure.

Confidentiality

CMI will always endeavor to keep a whistleblower's identity confidential where asked to do so, although cannot guarantee this. There may be the need to disclose your identity to:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud)
- the courts (in connection with court proceedings)
- another person to whom CMI is required by law to disclose your identity.

A whistleblower should also recognise that he or she may be identifiable by others due to the nature or circumstances of the disclosure.

What happens after the investigation?

The Head of Awarding Body and Compliance will ensure, to the appropriate extent, that the findings of the investigation are communicated to:

- you, as the person raising the wrongdoing concern (assuming that contact details have been supplied)
- the individual(s) under investigation and if appropriate, other external authorities who may need to consider whether action should be taken on the basis of the findings.