

CMI Awarding Body

CMI Investigation Procedure - V6

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AB/PRO/0012 - January 2026 - V6

History

Date	Amendments Made
January 2026 / V6	Full review of the document Incorporate CMI Partner Connect Amend SQA Accreditation to Qualifications Scotland Accreditation

Intended Audience

- CMI Quality Managers
- CMI Markers and Moderators
- CMI Partner Relationship Managers
- CMI Partner Engagement Managers
- CMI Awarding Body Support Team
- CMI Centres

All of CMI's policies are published on the [CMI Policies Webpage](#)

Purpose

This document details procedures for investigating and determining suspected cases of malpractice, maladministration, complaints, incidents and appeals. These procedures are designed to be fair, thorough, impartial and objective, meeting or exceeding current legal requirements. Regulations require CMI to publish procedures to Centres to deal with investigations involving Learners, Centre staff and any others involved in the delivery, assessment and the award of qualifications, and to take appropriate action to maintain the integrity of CMI qualifications and apprenticeship assessments. This document fulfils that requirement.

Scope

This procedure applies to all Chartered Management Institute (CMI) Awarding Body employees, contracted staff and CMI Centres. It sets out the requirements for conducting an investigation.

Regulatory Requirements

This policy meets the regulatory requirements set out by our regulators: Ofqual, CCEA Regulation, Qualifications Wales, and Qualifications Scotland Accreditation.

[Ofqual - General Conditions of Recognition](#)

[Qualifications Wales - Standard Conditions of Recognition](#)

[CCEA Regulation - General Conditions of Recognition](#)

[Qualifications Scotland Accreditation - Regulatory Principles \(2021\)](#)

Regulator or Relevant Regulatory Body	Reference Details	Legislation/Regulatory Reference
Ofqual	General Conditions of Recognition	Condition No: A7 - Management of Incidents A8 - Malpractice and Maladministration
Qualifications Wales	Standard Conditions of Recognition	Condition No: A7 - Management of Incidents A8 - Malpractice and Maladministration
CCEA Regulation	General Conditions of Recognition	Condition No: A7 - Management of Incidents A8 - Malpractice and Maladministration
Qualifications Scotland Accreditation	Regulatory Principles 2021	Principle 7. The awarding body must have an effective approach for communicating with its staff, stakeholders and SQA Accreditation. Principle 18. The awarding body and its providers must ensure that it

		has safeguards to prevent and manage cases of malpractice and maladministration.
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Definition

The term 'investigation' describes the action of investigating suspected cases of malpractice, maladministration, complaints, incidents and appeals.

Investigation Procedures

CMI takes robust steps to prevent any Adverse Effects in the delivery, assessment and award of CMI qualifications. Where it is not possible to prevent this, it is important that these cases are dealt with promptly and in line with CMI procedures.

The CMI procedure for an investigation includes:

1. Investigation
2. Report
3. Decision
4. Sanctions and penalties
5. Appeals against decisions
6. Maintaining records

Investigation

CMI may decide to:

- Instruct the Centre to conduct an investigation
- Conduct an investigation itself; or
- Nominate a third party to carry out the investigation on its behalf.

The fundamental principle of the investigation is that the investigation must be conducted in a fair, reasonable and legal manner, ensuring that all relevant information is considered without bias. CMI will typically deal with the Centre Programme Director. Investigations may involve a visit to the Centre (pre-arranged or unannounced). If a Centre is asked to conduct its own investigation, any associated costs with the investigation will not be refunded.

- **Centre-led Investigation.** CMI will provide the Centre with relevant guidance and support. The Programme Director should carry out the investigation within a given timeframe, consistent with a fair and thorough process.
- **CMI-led Investigation.** CMI will conduct the investigation if the Centre lacks the capacity, or if the issue is very serious (e.g. alleged fraud or a serious threat to qualification integrity). This will be carried out by the Quality Manager, Senior Quality Manager, Head of Quality or Head of Awarding Body, depending on the severity of the issue and/or where escalation is required. CMI may apply a fee depending on the level of resources, time and complexity required. Please refer to the [CMI Fees Guide](#) for further information.
- **Third Party Investigation.** Where a third party is nominated to carry out an investigation on CMI's behalf, CMI will liaise with the relevant Third Party and provide them with all the information to allow them to conduct a full investigation on CMI's processes and procedures, providing any feedback to CMI where applicable.

Investigation Objectives

Investigations should aim to:

- Establish the facts relating to allegations/complaints to determine if irregularities occurred.
- Establish the facts, circumstances, and scale of the allegation.
- Identify the cause of irregularities and those involved.
- Identify and take action to minimise risk to current Learners and certification.
- Evaluate action(s) already taken by the Centre.
- Determine if remedial action is required to reduce risk and preserve qualification integrity.
- Ascertain if action is required regarding certificates already issued.
- Obtain evidence to support any sanctions.
- Identify patterns or trends, identifying any updates to current policies (CMI and Centre policies).

During the Investigation

The following principles should be adhered to:

- **Confidentiality** – By their very nature, investigations usually necessitate access to information that is confidential to a Centre or individuals. All material collected as part of an investigation must be kept secure and not disclosed to any third parties (other than the regulators or the police, where appropriate), in line with GDPR and data protection legislation requirements
- **Rights of individuals** – Suspected individual(s) will be:-
 - Informed of the allegation and supporting evidence in writing.
 - Given the opportunity to seek advice, respond to the allegation, and submit a written statement.

- Informed of possible consequences and potential disclosure to other parties (for example, regulators, Police, funding agencies and professional bodies).
- Informed of the appeals process.
- **Interviews** - Interviews should be conducted to gather information. Centre staff interviews should follow Centre policy (for example, disciplinary enquiries) and allow for accompaniment. Minors or vulnerable adults should have a parent/guardian present or permission obtained. Legal representation for one party implies the same opportunity for others.
- **Retention and storage of evidence and records** – All relevant documents and evidence should be retained in line with CMI's policy.

And/Or

- **Sanctions** – Any sanctions applied to a Centre or an individual by CMI will be commensurate with the level of non-compliance identified (and evidenced) during the investigation and will be in line with the CMI's sanctions policy.

Investigation Report

Where the investigation has been carried out by the Centre, the Programme Director is required to submit a written report to CMI via CMI Partner Connect. Where the investigation has been carried out by CMI, the allocated investigator will complete the investigation report directly within CMI Partner Connect. All investigation reports must be created and managed through CMI Partner Connect using the **Incident Investigation Report form**. This ensures a centralised and auditable record of the investigation lifecycle, including:

- **Initial Reporting.** Creation of the incident report and capture of initial details.
- **Information Gathering.** Formal requests for information from the Centre and management of the Centre responses directly through the system.
- **Internal Investigation.** Documentation of internal findings, including whistleblower details (if applicable), investigation background, Centre background and any interviews held.
- **Outcome and Review.** Recording of final internal findings, sanctions and Senior Leadership review.
- **Centre Notification.** Communication of the final decision to the Centre and managing their response to the findings.
- **Closure.** Documenting lessons learnt and formally closing the investigation.

The report should be accompanied with one or more of the following, as applicable:

- A statement of the facts, a detailed account of the circumstances.
- Written statements from interviewed Centre staff and Learners.

- Relevant Learner work and internal assessment or quality assurance records.
- Details of remedial action taken by the Centre to ensure the integrity of certification now and in the future
- Evidence of any mitigating factors

Using CMI Partner Connect for Investigations

All investigation activity must be recorded in CMI Partner Connect. The key stages of the process are:

1. **Initiation.** The Awarding Body Quality Team creates an “Incident Investigation Report” in CMI Partner Connect.
2. **Evidence Collection.** CMI can issue an “information request” to the Centre through CMI Partner Connect, selecting the relevant organisation and products. The Centre receives a notification and must respond by completing the “Response for Information from Centre” form and attaching relevant evidence.
3. **Internal Processing.** CMI staff complete the internal sections regarding the investigation brief, interviews, and wider impact. All sections must be saved to ensure data is retained.
4. **Decision and Review.** Findings and proposed sanctions are documented. The report is then reassigned to the Senior Quality Manager or Head of Quality for review before the outcome is finalised.
5. **Communication.** The investigation outcome is shared with the Centre through the “Final Findings for the Centre to review” section of the form. The Centre has an opportunity to provide its comments by completing the “Response to the findings” section of the form.
6. **Conclusion.** Once all actions are complete, the investigation is formally closed on the system.

The Decision

The investigation report will be submitted to the Senior Quality Manager/Head of Quality (who has not been previously involved in the investigation) for a final decision. The decision stage aims to:

- Identify compromised regulatory/Centre approval criteria
- Consider the facts of the case
- Decide, on the facts, whether malpractice and/or maladministration has occurred
- Establish responsibility
- Determine appropriate remedial action.

In the event of wrongdoing:

- **By a Centre:** CMI will take action to minimise risk to certification integrity, maintain public confidence, discourage recurrence, ensure no gain from compromised standards, and advise regulators where relevant.
- **By a Learner:** CMI will consider the Centre's remedial action and advise on its appropriateness.
- **By CMI:** CMI will take immediate action to contain and mitigate any adverse impact on assessments, results or certification by correcting any errors, reviewing or amending affected outcomes, investigating the root cause and implementing corrective and preventative actions.

Decisions will be justifiable, reasonable, consistent, and based only on available evidence.

Sanctions

CMI will impose sanctions on Centres where the allegations have been proven, in line with CMI Sanctions Policy, which can be accessed on [CMI Policies Page](#).

Sanctions aim to:

- Minimise the risk to the qualification integrity of CMI qualifications, both now and in the future
- Ensure that only those Learners who have reached the required standard are awarded the qualification
- Maintain public confidence in the delivery and awarding of qualifications
- Serve to deter similar conduct from others.

The sanction will depend on the nature and scale of the allegation.

Appeals against decisions

Please follow the CMI Appeals Policy and Procedure, which can be accessed on the [CMI Policies Page](#)

Maintaining Records of Investigations

Centres must retain records and documentation in line with Centre and CMI record retention requirements. Records should include the investigation report, written statements, Learner work/assessment records, and details of remedial action. CMI will hold documentation within CMI Partner Connect.

Alerting other Awarding Bodies

CMI **must** notify other Awarding Bodies of cases that could have an Adverse Effect and where these cases are likely to impact the other Awarding Bodies. CMI must pay due regard to this requirement and notify other Awarding Bodies, as appropriate. This will usually be appropriate where:

- The Centre where the Adverse Effect has occurred (or is suspected to have occurred) is also approved by another Awarding Body (for the same or different qualifications), and the suspected wrongdoing may have implications for activities delivered on behalf of that other Awarding Body
- The Centre where the incident has occurred (or is suspected to have occurred) is also approved with another Awarding Body for the same qualifications, and there is a risk that the Centre could move its operations to the other Awarding Body in an attempt to avoid sanctions and continue sub-standard practices
- The Centre where the incident has occurred (or is suspected to have occurred) has indicated that it is seeking approval from another Awarding Body for the same or different qualifications.

Monitoring and Review

This policy will be reviewed in line with CMI's Document Control Policy.