



CMI Awarding Body Whistleblowing Policy – Ref: AB/POL/0013/Jul18/V03

Purpose

This policy applies to individuals who do not work for CMI, and 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 have a positive commitment and open approach to whistleblowing. Our policy and procedure is intended to be used in line with the Public Interest Disclosure Act 1998 (PIDA). This provides protection for whistleblowing on wrongdoing. Our policy encourages Learners/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; and
- 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 have 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 our Complaints Policy for conducting enquiries into complaints about awarding organisations and qualifications.

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. We cannot take action over grievances of this nature.

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

Scope

This policy applies to individuals who do not work for CMI, including CMI Centre staff.

The content of the disclosure

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.

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

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

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

- by email to awardinbody awardingbody@managers.org.uk
- through our 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

What happens after the disclosure is made?

1. If you choose to make a whistleblowing disclosure to CMI, and have provided contact details, we will send you an initial acknowledgement that we have received your disclosure.
2. We will normally ask you to provide as much of the evidence as possible that you have seen to support your disclosure.
3. We will conduct a full investigation (for further details please refer to the CMI Investigation policy). We 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. We will consider each disclosure of information sensitively and carefully, and decide upon an appropriate response. We may share with third parties any information received in the disclosure where we consider it necessary to do so.
5. In most cases, we will keep you updated as to what action is being taken in response to your disclosure. We 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?

If you disclose your identity, it will be easier for us to:

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

We very much hope that the assurances we give in this policy will encourage you to disclose your identity to those who need to know. However, if you wish to raise an issue anonymously, we will, of course, consider your disclosure.

Confidentiality

We will always endeavor to keep a whistleblower's identity confidential where asked to do so, although we cannot guarantee this and we may 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 we are 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.
- 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.