



Whistleblowing Policy

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Introduction

All organisations face the risk of things going wrong or of unknowingly obscuring malpractice. We have a duty to identify and take measures to remedy all malpractice particularly with regards to issues of fraud and corruption.

By encouraging a culture of openness in organisations CIOL Qualifications (CIOLQ) believe that we can reduce, and in many cases prevent malpractice before it happens.

We want to encourage you to raise issues which concern you in your work and learning. We recognise, however, that people may be worried that by reporting incidents, you will be opening yourself up to victimisation, detriment or risking your job security.

These concerns are understandable, this policy is therefore designed to provide you with information about the protection offered by the Public Interest Disclosure Act (PIDA) as well as the process by which you may raise your concerns.

By being aware about malpractice at an early stage there is more chance that the necessary steps are implemented to safeguard the interests of all candidates and staff and to stop fraudulent activity before things worsen.

Scope

This policy is intended to provide guidance to any individual, employed or contracted by CIOL Qualifications (CIOLQ), who wishes to disclose information relating to the delivery and/or assessment of CIOLQ qualifications in relation to malpractice or maladministration.

Disclosures to CIOLQ may be made by, for example:

- Internal staff
- Assessment Associates
- Board and Council members
- Centre staff
- Candidates

Definitions of types of whistleblowing

Whistleblowing

A disclosure by an individual concerning an act of malpractice, or the covering up of malpractice. Whistleblowing is distinct from complaints and appeals.

Malpractice

Any deliberate activity, neglect, default or other practice that compromises, or could compromise

- the assessment process
- the integrity of a regulated qualification
- the validity of a result or certificate
- the reputation and credibility of CIOLQ and/or its qualifications.

Complaint

Any concern relating to a personal grievance over any of our services received or expected or the services of centres provided to candidates.

Enquiry about results and appeals

Any concern or objection that relates to an assessment result that could risk the integrity of the exam.

How to report a concern

Any person with a concern in respect of CIOLQ qualifications or CIOLQ should consider if it is appropriate and possible to raise the issue directly with the line management of the organisation or individual concerned before escalating to CIOLQ.

If the concern raised is not satisfactorily addressed at this stage, or if it is not possible to raise concerns directly with the line management of the organisation or individual concerned, the issue should be reported directly to the Head of Qualifications by email to qualifications@ciol.org.uk, using the CIOLQ Whistleblowing Report Form (below), attached to an email. If reports are made anonymously and/or specific malpractice details are not provided, it may not be possible to substantiate the disclosure and carry out a full investigation.

What we will do

After you have raised your concern, we will decide on what action to take in a responsible and appropriate manner. Usually this will involve making internal enquiries initially, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised.

If you have raised a concern, we will, as far as possible, keep you informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, we will not be able to inform you of any matters which would infringe our duty of confidentiality to others.

The reported malpractice will be reviewed and further information from the whistleblower will be requested if required.

If deemed necessary, a malpractice case will be opened. We will contact all parties necessary to pursue the investigation. If appropriate, we will also notify and periodically update any other Awarding Organisations affected and/or the regulator.

Upon conclusion of our investigation, we will report back to the whistleblower to confirm the action that has been taken. It should be noted that specific details may not be given on the outcomes of our investigations. CIOLQ has a responsibility to all concerned with respect to confidentiality.

Protection of whistleblowers and confidentiality

The Public Interest Disclosure Act (PIDA)

The Public Interest Disclosure Act (PIDA) is intended to protect individuals who make certain disclosures of information in the public interest, allowing them to bring action in respect of any victimisation.

If an individual has made a disclosure which is protected under PIDA the individual has a right not to be subject to detrimental treatment or breach of an employment contract because of that protected disclosure.

Confidentiality

Concerns will be treated seriously, and actions taken in accordance with this policy and if you ask us to treat the matter in confidence, we will do our utmost to respect your request. CIOLQ will always aim to keep the identity of any whistleblower confidential.

However, if you make the decision not to tell us who you are it will be much more difficult for us to investigate the matter fully or give you feedback. Additionally, while we will consider anonymous reports, it may be more difficult for you to be protected under PIDA where there is no evidence that it is you who has made the disclosure.

If concerns are raised, we give whistleblowers assurance that we will not intentionally cause the whistleblower to suffer reprisal or victimisation as a result of their actions.

Whistleblowers should be aware that the details and nature of their disclosure may inevitably lead to their identification in the course of our subsequent investigation.

Such as in the case of:

- criminal investigations, including fraud
- court proceedings
- another person to whom we are required by law to disclose identities.

Policy updating and reviewing

All policies relating to CIOLQ will be updated on an 18-month cycle or sooner as required.

Policy version and owner

Policy review date	April 2023
Policy owner	Responsible Officer

Regulatory references

Ofqual General Conditions of Recognition
Condition A8: Malpractice and maladministration
Qualifications Wales
Condition A8: Malpractice and maladministration

Appendix A - Whistleblowing Report Form

Please complete the form below as fully as you can. You do not have to give your name and personal details, but our ability to carry out an investigation may be limited if you do not:

Title		Name of whistleblower	
Telephone		Email address	
Job title		Organisation	

CIOLQ qualification/s		No. of candidates affected	
Centre name			
Address			

Details of incident or practice

Please explain your concerns in detail, including relevant dates, locations and the names of any individuals involved. If any certificates have been issued, please also confirm, including dates and amounts if possible.