

CFA UK Awarding Organisation Whistleblowing policy

1 Introduction

- 1.1 CFA UK is a professional membership body for investment professionals in the UK and part of the worldwide network of member societies of CFA Institute. We are also the Awarding Organisation for qualifications specific to the UK investment profession. CFA UK is committed to protecting the integrity of the development, delivery and award of its qualifications.
- 1.2 This policy is aimed at any individual involved in the development, delivery and award of CFA UK qualifications (eg candidates, training providers, test centre staff, CFA UK staff and volunteers involved in qualifications).
- 1.3 All those accessing this policy should be mindful of the national regulator's (Ofqual) requirements which may be readily found at:

<https://www.gov.uk/guidance/ofquals-whistleblowing-policy>

2 Definitions

- 2.1 **Whistleblowing** (Ofqual)
- 2.2 Whistleblowing is one way in which an individual can raise a concern about wrongdoing, risk or malpractice.

- 2.3 **Malpractice**

The breach of any published regulation or Code of Practice and actions which would damage the reputation and worth of CFA UK qualifications if not addressed and which might include:

- A criminal offence such as bribery to influence assessment results.
- Cheating in set test/examination conditions.
- Obtaining examination/test questions before the date or period they are due to be taken.
- Altering, falsifying assessment records to deliberately change the achievements of learners.

- 2.4 **Complaints and Appeals**

Whistleblowing does not apply to either making a complaint or an appeal. A complaint is usually a grievance and could relate to poor administration or customer service.

Appeals are generally made against the outcomes of assessment where it is felt that the gap between the expected and actual result is far greater than was anticipated.

Guidance on appeals and/or complains can be obtained via the CFA UK Assessment Queries Policy and Appeals and Candidates Complaints Policy which may be readily found on the CFA UK website.

3 Whistleblowing Procedure

Raising a concern

3.1 Stage 1

Whatever the circumstance, where there is a concern that malpractice has taken place in relation to CFA UK qualifications, you should address your concerns directly to the CFA UK's Director of Education via the CFA UK Whistleblowing form which is attached here as Annex A and which may also be found separately on the website (give link again).

CFA UK Response Procedure

3.2 Stage 2

CFA UK's Director of Education will evaluate your concern and may ask you for more evidence / information using the contact details you provided on the CFA UK Whistleblowing Form.

CFA UK's Director of Education will decide whether and how to pursue the issue expressed by you. You will receive an update on any course of action taken by CFA UK within 20 working days of raising your concern. Where the investigations take longer, due to the issued being investigated, this may take longer.

Upon conclusion of any investigation, CFA UK's Director of Education will provide you with a summary update of outcomes given the need to protect confidentiality. This will be provided within ten working days of the conclusion of the investigation.

Where there are reasonable grounds to conclude that wrongdoing related to the awarding body activities has taken place, the Director of Education will provide the regulator (s) with full details of the investigation/evaluation and outcome.

Important Note:

At all stages of the matter being investigated, CFA UK will take all possible steps to protect your identity given the details / context expressed in the next section of this document under 'Confidentiality'.

CFA UK will consider each disclosure of information sensitively and carefully and decide upon an appropriate response. Information received in a disclosure may be shared with third parties where considered necessary.

4 Confidentiality

4.1 CFA UK will always endeavour to keep a whistleblower's identity confidential where asked to do so, although by law and by regulation, 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;
- The national regulator responsible for the standards of the qualification(s) concerned.

In circumstances where it may not be possible to keep the whistleblower's identity confidential, this will be discussed with the whistleblower.

A whistleblower should also be aware that they may be identifiable by others due to the nature or circumstances of the disclosure.

5 Protection of whistle blowers

You will receive CFA UK's support if you report wrongdoing under this procedure. If you believe that you are being disadvantaged by CFA UK as a result of the report, you should immediately inform the Director of Education or HR Department (for internal employees). You will not be victimised or disadvantaged by CFA UK for doing this. The only caveat to this is that, if your allegations are proven to be false and not made in good faith, disciplinary proceedings are likely (for internal employees or CFA UK members).

6 How to contact us

6.1 Please use the whistleblowing report form on the CFA UK website It may be completed electronically and sent to info@cfauk.org.

Whistleblowing disclosures can also be made by telephoning 020 7648 6200 between the hours of 9.30am to 5.30pm Monday to Friday and by post to:

Director of Education
CFA Society of the UK
Education Department
3rd Floor, Boston House
63-64 New Broad Street
London EC2M 1JJ