



The only awarding body
run *by* counsellors
for counsellors

2024 - 2025

CPCAB Whistleblowing Policy



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1. Introduction

At CPCAB we are committed to the highest standards of openness and accountability. We encourage staff, tutors, candidates and others who have serious concerns about any aspect of our Qualification Service to come forward and voice those concerns. CPCAB's policy for dealing with whistleblowing aims to:

- provide a way to raise a concern that is confidential where possible ([see part 5](#));
- take concerns seriously and respond in good time.

This policy does not apply to issues specifically related to a centre's relationship with its candidates or appeals about assessment decisions. You should read it in conjunction with CPCAB's policies on complaints, malpractice & maladministration, sanctions and appeals (available via the [CPCAB website](#)).

2. What is Whistleblowing?

Whistleblowing is when you raise a serious concern in which you don't have a direct involvement or a prospect of personal gain. Concerns raised for your own benefit are 'complaints', even if you raise them anonymously.

We are required by our regulators to investigate allegations including:

- malpractice, in particular in relation to the assessment of candidates;
- maladministration in relation to CPCAB qualifications, including failure to adhere to CPCAB published procedures.

CPCAB normally doesn't communicate directly with candidates, who are contracted to their registered training centre rather than to us. In cases of whistleblowing this may be relaxed.

3. Investigations

Initial investigations are carried out by an allocated panel of CPCAB staff. If urgent action is needed it will be taken before the investigation is launched. In the event of serious problems being identified the investigation may potentially be referred to:

- a different department within CPCAB or an external consultant;
- Ofqual (the Office of Qualifications & Examinations Regulation), Qualifications Wales or CCEA (Northern Ireland);
- an appropriate professional organisation, eg BACP;
- the Police, if the situation is very serious.

However, less serious concerns may be resolved by agreeing an action plan, without the need for a formal investigation.

4. How to Raise a Concern

You can raise concerns verbally or, preferably, in writing (please see pro forma in [appendix 1](#)). You should include the background and history of your concern, with relevant details such as names and dates and whether you have already made a direct complaint. You should explain why the situation concerns you and declare any personal interest or opportunity of personal gain. You don't have to provide proof of an allegation beyond all doubt, but you must be able to show that you have reasonable grounds for concern.

- **Tutors, exams officers or other centre staff** can raise a concern either directly with CPCAB Head Office or with their designated CPCAB External Verifier during a verification visit who will make the referral to Head Office on their behalf.
- **Candidates** are encouraged to raise concerns via their recognised centre, if at all possible, preferably informally in the first instance (see CPCAB's complaints policy). Where this is not possible, as stated above CPCAB will waive its normal practice of not communicating directly with candidates.
- **Other individuals** are asked to make a judgment about the most appropriate place to report their concern, depending on its nature.

CPCAB will respond to your concern, normally within two working weeks:

- acknowledging that we have received your concerns;
- indicating how we will investigate (if an investigation is appropriate);
- giving an idea of how long any proposed investigation is likely to take.

We will let you know when the process has been concluded. However, for reasons of confidentiality it may not be possible to inform you of the outcome.

5. Protection of the Whistle-blower

All concerns will be treated in confidence in the first instance and we will make every effort not to reveal your identity. Do bear in mind, though, that your identity could be revealed during an investigation because of some of the information you have provided. If it's a very serious matter, you may be asked to provide a statement or even come forward as a witness. We can't accept responsibility for your identity being revealed as part of an investigation resulting from whistleblowing.

If your allegation was made in good faith but the investigation doesn't confirm it, no action will be taken against you. However, allegations must never be made frivolously, maliciously or for personal gain. Please see [CPCAB's complaints policy](#) for our definition of a vexatious complaint. Any investigation into allegations of potential malpractice will not influence (or be influenced by) any disciplinary or redundancy procedures that already involve you.

The Public Interest Disclosure Act 1998¹ provides a worker with potential protection when making a 'qualifying disclosure'. See the footnote, below, for information about the PIDA.

¹ THE PUBLIC INTEREST DISCLOSURE ACT

Protection under PIDA (with thanks to Ofqual's Whistleblowing Policy)

PIDA gives protection to whistleblowers for disclosures that tend to show that:

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

6. Anonymous Allegations

You are requested to include your name and contact details with your allegation if possible. Concerns raised anonymously or through a third party have less validity and it may not be possible to investigate them, depending on the seriousness of the concern and the possibility of confirming the allegation.

This policy will be reviewed at least annually as part of CPCAB's documentation update.

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Disclosures may be protected under PIDA if:

- The disclosure is made **in good faith**;
- The initiator reasonably believes that the information disclosed and any allegations he or she makes are **substantially true**;
- The initiator does not make the disclosure so that he or she can make a **personal gain**;
- In all the circumstances it is reasonable for the initiator to make the disclosure.

In addition at least one of the following must apply:

- The disclosure must relate to **malpractice** or a wrongdoing which is of an exceptionally serious nature;
- The initiator must reasonably believe that he or she will be **subject to detriment** if the disclosure is made to the subject of the complaint;
- The initiator must reasonably believe that evidence will be **concealed or destroyed** if the disclosure is made to the subject of the complaint;
- The initiator has made a very similar disclosure to the subject of the complaint or to the prescribed regulator that the initiator believes to be relevant.

A disclosure will NOT be a protected disclosure if the initiator:

- Commits a **criminal offence** in making it;
- Has received the information in the course of providing legal advice or **legally privileged information**.

Appendix 1

It will help us to investigate your concern if you are able to provide us with the details below.

Name:	
Telephone number(s):	
Email:	
Position:	Programme Manager/Tutor/Candidate/Other (please give details)
Centre:	
Qualification(s) concerned:	
Nature of concern:	<p>Please include the background and history of the concern, giving as many relevant details as possible, such as names and dates and whether the complaint has already been made directly to its subject. You should also declare any personal interest you may have in the situation, or opportunity of personal gain. You can continue on a blank sheet if you wish.</p>
Date:	

Please complete all sections as fully as you can and send to the Qualification Standards Team at standards@cpcab.co.uk