

# Whistleblowing Policy

**This policy is reviewed annually to ensure compliance with current regulations**

Approved/reviewed by	
ABPI Director of Examinations September 2023	
Date of next review	September 2024

## Whistleblowing policy

The ABPI is committed to managing the ABPI examination to the highest standards of transparency and ethics. We expect all candidates and ABPI staff and contractors to be honourable in all aspects concerning the attempting and management of the exam process.

However, all institutions face the risk of things going wrong from time to time or of unknowingly harbouring illegal or unethical conduct. The ABPI is committed to the highest standards of openness, probity and accountability to prevent such situations occurring or to address them when they do occur.

Whistleblowing is the reporting of a suspected wrongdoing in relation to the ABPI examination. This policy is relevant to any suspected misconduct at any stage of taking the examination, whether before, during and/or after taking the exam. A whistleblower is a person who raises a genuine concern in good faith. If you have any concerns related to suspected wrongdoing (a whistleblowing concern) you should report it to the ABPI immediately.

You are encouraged to set out your concerns in writing so that the ABPI can acknowledge your request as received and being processed. Please email [exams@abpi.org.uk](mailto:exams@abpi.org.uk) in the first instance, or, if your concern is about the ABPI Examinations Team, or the Director of Examinations, you should contact the ABPI Chief Executive directly.

**The aims of this policy are:**

- to encourage candidates and colleagues (whether friends, family or otherwise) to report any suspected wrongdoing as soon as possible
- to provide guidance on how to raise or disclose concerns
- to reassure that a genuine concern raised in good faith will not cause reprisals for the discloser

**Protect (<https://protect-advice.org.uk/>) (an independent charity), offer a confidential helpline about whistleblowing.**

**Misconduct affected by this policy includes but is not limited to:**

- attempts to cheat at the ABPI examination, or suspecting this might happen
- cheating by reviewing an unauthorised copy of exam questions or exam question answers before taking the exam
- cheating by attempting to copy or otherwise view or steal someone else's exam responses, or suspecting this might happen
- accepting or receiving a bribe related to taking the examination, or suspecting this might happen in future
- being asked to give a bribe related to taking the examination, or suspecting this might happen in future
- misrepresenting your identity when taking the ABPI examination, or suspecting this might happen
- taking the examination on behalf of another person, or suspecting this might happen
- using a mobile handheld device (internet enabled or similar) or unauthorised document to look up answers during the examination or suspecting this might happen
- attempts to access live exam questions, or suspecting this might happen
- criminal activity such as fraud, dishonesty or deception
- behaviour which assists another candidate in an unauthorised manner
- failure to follow the directions of the exam proctor
- leaving the examination session at any time unless authorised to do so by the proctor
- communicating with another person during the examination session other than the proctor

- serious incapacity during exam sittings caused by alcohol or illegal drugs
- use of words or behaviour which is threatening abusive or insulting to other candidates, the proctor or any staff member of ABPI

The above list should be read in conjunction with the ABPI Examination Malpractice Policy (available [here](#))

## **The procedure:**

### **Raising a concern**

Where appropriate, if the matter arises during the course of conduct of an examination, you are encouraged to tell the proctor as soon as possible to alert them of the issue. The proctor will note your comments, and this will be reported to the ABPI Director of Examinations. The ABPI Director of Examinations will assess the level of investigation required and, proceed to compile an investigator's report as necessary. (See also the ABPI Examination Malpractice Policy).

It is important that you contact the ABPI Director of Examinations as soon as possible to raise concerns about any issue or suspicion of malpractice. We hope that in the majority of cases you will be able to raise concerns with the ABPI Director of Examinations. You may tell him/her in person or put the matter in writing if you prefer. The ABPI Director of Examinations may be able to resolve your concern quickly and effectively, and can report issues to the ABPI Chief Executive as required.

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The ABPI will treat all disclosures seriously and will investigate as appropriate, where possible with confidentiality respected. After having made initial inquiries the ABPI reserves the right to contact third parties including the police or known employers of affected persons to report any suspected serious misconduct.

If you are unsure whether a particular act constitutes something to be reported, or you have any queries we encourage you to contact the ABPI Director of Examinations as soon as possible. If you feel that the ABPI Director of Examinations has not sufficiently addressed your concern within initial investigations, or you prefer not to raise it with him/her for any reason, you should contact the ABPI Chief Executive directly.

The ABPI Chief Executive has overall responsibility for this policy and for reviewing the effectiveness of actions taken in respect of concerns raised under this policy, particularly in relation to the conduct of exams.

## **Investigations**

We will arrange a meeting with you as soon as possible to take down a written summary of your concern and to discuss your concern. You may bring another person of your choice with you to any meetings held under this policy. We ask that your companion respects the confidentiality of your disclosure and any subsequent investigations. We will provide you with a copy of the written summary after the meeting as soon as reasonably possible.

Once you have raised a concern, the ABPI Director of Examinations will carry out an initial assessment to determine the scope of any investigation and will communicate with you to give an indication of how we propose to deal with the matter, in line with all procedures set out in the ABPI Examination Malpractice Policy. You may be required to attend additional meetings in order to provide further information about the circumstances of your complaint.

The investigation will then be considered by the ABPI Director of Examinations before deciding the outcome of the assessment. The ABPI Examinations Director reserves the right to seek further review of an investigation by the ABPI Chief Executive and/or the Chair of the independent Exam Governance Committee depending on the nature and complexity of the case. Communication of the outcome will be sent to: (a) you; (b) the individual(s) under investigation; and, where appropriate, (c) members of the individual's employer's legal or management teams (where appropriate) and any external authorities who may need to consider whether action should be taken.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

## **Outcome**

If a conclusion decided by the ABPI Examinations Director is that there has been serious inappropriate behaviour by

someone, including any activity amounting to an offence under the Bribery Act, or leading to a pecuniary advantage obtained by deception, that conclusion will be reported to the ABPI Chief Executive and Executive Legal Director, and may be reported to the ABPI Exam Appeal Board, as well as, where appropriate and not already involved, to any external authorities including the Police and any employers affected.

While we cannot guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this. If you are not happy with the way in which your concern has been handled either during the process or after a result has been published by either the ABPI Examinations Director or Chief Executive, you can raise it with the independent ABPI Exam Appeal Board.

Having received the investigating officer's report, the outcome could be to prescribe any or all the following sanctions:

- No further action
- No case to answer
- Award a mark of zero for the unit concerned for relevant persons
- Ask a candidate to retake or undertake further examination units under specific conditions agreed in writing with the ABPI Director of Examinations
- Refer the matter to the employer of the relevant person(s) or to the appropriate national authorities

## **Appeals**

As a whistleblower you may appeal against any decision made by the relevant ABPI representative referenced above, by writing within 14 days of notification of the result to the ABPI Director of Examinations who will refer the matter to the independent ABPI Exam Appeal Board to make a final decision. The appeal must set out the grounds and further information on which the appeal is being made.

The following grounds of appeal are applicable for whistleblowers and candidates to give:

- New evidence which could not reasonably have been made available at the original disciplinary hearing, or
- A procedural irregularity occurred which had a detrimental impact on the outcome of the disciplinary hearing, or
- The penalty imposed was disproportionate given the nature of the alleged disciplinary offence.

The appeal may uphold, remove or amend any terms of the candidate under investigation's outcome. The ABPI Exam Appeal Board decision is final.

## **Contacts**

### **ABPI Director of Examinations**

**Andrew Croydon**

**+44 (0) 207 9303477**

**[exams@abpi.org.uk](mailto:exams@abpi.org.uk)**

**ABPI Chief Executive**  
**Dr Richard Torbett**  
**+44 (0) 207 9303477**  
**getintouch@abpi.org.uk**

**ABPI Exam Appeal Board:**  
**Legal representative**  
**Chair of ABPI Exam Governance Committee**  
**ABPI Board of Management Reputation Sponsor**

**Contact in writing via [ABPI exams@abpi.org.uk](mailto:ABPI_exams@abpi.org.uk) or**  
**2<sup>nd</sup> Floor Goldings House, Hay's Galleria, 2 Hay's Lane,**  
**London, SE1 2HB**

**Protect (<https://protect-advice.org.uk/>) (an independent charity)**

**Helpline: (020) 31172520**

**E-mail: [Contact our Advice Line - Protect - Speak up stop harm \(protect-advice.org.uk\)](https://protect-advice.org.uk/)**