



Whistleblowing Policy for CIFA Education Ltd

December 2024
CIFA Whistleblowing Policy
Doc Number: WBP
Version 1



1: Purpose and Scope	2
2: Definition of Whistleblowing	2
3: Responsibilities	2
4: Reporting Procedure	2
4.1: Raising a Concern	2
4.2: Anonymous Reporting	3
5: Protection Against Retaliation	3
6: Investigation Process	3
7: Training and Awareness	3
8: Monitoring and Review	4
9: External Reporting	4
10: Contact Details	4



1: Purpose and Scope

CIFA Education Ltd. ("CIFA") is committed to the highest standards of integrity, transparency and accountability. This policy guides raising concerns about malpractice, misconduct or unethical behavior within CIFA. It is designed to ensure that such concerns are properly addressed and that individuals making disclosures are protected from retaliation.

This policy applies to all employees, contractors, volunteers, and any other individuals working with or for CIFA, in compliance with the UK Public Interest Disclosure Act 1998 (PIDA), other relevant UK legislation, and global best practices.

2: Definition of Whistleblowing

Whistleblowing is the act of reporting suspected wrongdoing or dangers in the workplace. This may include but is not limited to:

- Criminal offenses (fraud, theft, corruption).
- Breach of legal or regulatory obligations.
- Health and safety risks.
- Environmental damage.
- Harassment, discrimination or abuse.
- Deliberate concealment of any of the above.

This policy does not cover personal grievances that do not involve public interest; such issues should be addressed under CIFA's grievance procedures.

3: Responsibilities

- **Management:** Ensure this policy is effectively implemented and that individuals feel safe to raise concerns without fear of retaliation.
- **Employees and Others:** Report concerns promptly and honestly.
- **Whistleblowing Officer:** Oversee the investigation of disclosures and ensure confidentiality and compliance.

4: Reporting Procedure

CIFA Education Ltd encourages all employees and contractors to report concerns about any wrongdoing or misconduct that could harm the integrity of the organisation. Reports can be made confidentially and without fear of retaliation.

4.1: Raising a Concern

Concerns that should be reported under this policy include, but are not limited to:

- Financial malpractice, fraud, or misrepresentation
- Misuse of company resources



- Breaches of regulatory or legal obligations
- Discrimination, harassment, or workplace misconduct
- Health and safety violations
- Environmental breaches
- Bribery and corruption

Disclosures can be made verbally or in writing to:

- **Line Manager:** If appropriate.
- **Whistleblowing Officer:** Operations Manager
- **External Reporting Channels:** In cases where internal reporting is not viable, individuals may contact a regulator, such as the UK's Financial Conduct Authority (FCA)

4.2: Anonymous Reporting

Anonymous disclosures are accepted but may limit the ability to investigate fully. Confidentiality will be maintained to the extent possible.

5: Protection Against Retaliation

- Retaliation against whistleblowers is strictly prohibited.
- Individuals who believe they have faced retaliation should report it to the Whistleblowing Officer or escalate the matter to an external body.
- Any act of retaliation will result in disciplinary action, up to and including dismissal.

All reports of bribery will be treated with strict confidentiality and handled in line with our whistleblowing procedures. Whistleblowers will be protected against retaliation, as outlined in this policy.

For more details on how bribery is defined, prevented, and addressed, please refer to the Anti-Bribery Policy (**Doc Ref: ABP**).

6: Investigation Process

- All concerns will be acknowledged within five business days.
- Investigations will be conducted fairly, thoroughly and promptly, maintaining confidentiality.
- Outcomes will be communicated to the whistleblower, subject to legal and confidentiality obligations.

7: Training and Awareness

- All staff will receive training on this policy and their rights and responsibilities.
- Regular updates will be provided to ensure ongoing compliance with UK and international standards.



8: Monitoring and Review

- This policy will be reviewed annually or sooner if required by changes in legislation or organisational needs.
- The effectiveness of the whistleblowing system will be monitored through audits and feedback.

9: External Reporting

In the UK, whistleblowers may contact relevant prescribed persons such as:

- Financial Conduct Authority (FCA).
- Health and Safety Executive (HSE).
- Information Commissioner's Office (ICO).

Internationally, reports can be made to bodies like Transparency International or local regulatory authorities where CIFA operates.

10: Contact Details

For further information or to report a concern:

- Whistleblowing Officer: Gurkan Gucerı (Operations Manager)
- Email: Gurkcifa@gmail.com

This policy is effective from 12/12/24.