

Global Speak Up Policy **Statement**

See something? Hear something?
SAY SOMETHING



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UNIVERSITY PRESS & ASSESSMENT

Introduction

We believe that our organisational goals should never be achieved at the expense of high ethical standards. To ensure that Cambridge stays on the right path, we strive to make it as easy as possible to speak up when something seems amiss. We encourage our employees and everyone we work with to raise concerns, and we do not tolerate retaliation against anyone who reports a concern.

The purpose of this policy is to explain how you can raise concerns about suspected misconduct in confidence and without fear of retaliation. It also describes what you can expect from Cambridge if you speak up. This Speak Up Policy applies to all employees, temporary and agency staff, consultants, contingent workers, contractors, Assessment Specialists and other third parties providing services to Cambridge in all geographical locations.

Policy statement

Cambridge truly values the help of all those who identify and speak up about potential concerns that need to be addressed. Speaking up is encouraged, and those who do speak up will be protected. Speaking up is essential for us to maintain our reputation, success and ability to operate both now and in the future.

What concerns are covered by this policy?

This Speak Up Policy can be used to raise concerns about suspected misconduct within Cambridge, including any violation of our Code of Ethics and / or any policies under which we operate. Examples of concerns that can be raised using this Speak Up Policy are:

- Breaches of confidentiality
- Bribery or corruption
- Bullying
- Conflicts of interest
- Data security incidents
- Discrimination - which could include ableism, ageism, antireligious, homophobia, racism, sexism, transphobia, or anything that unfairly treats a person or group differently on the grounds of their characteristics or background
- Environmental, or health and safety issues
- Fraud
- Harassment
- Human rights violations, such as slavery, human trafficking or child labour
- Improper use of company resources
- Inadequate financial or non-financial recordkeeping
- Microaggressions
- Money laundering or violations of sanction laws
- Nepotism or favouritism
- Publishing ethics concerns
- Violations of any of our policies
- Violations of competition laws and rules

Do **not** use this policy:

- To report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your relevant local authorities or call your country's emergency phone number.
- For any grievances you may have in relation to your terms of employment
- To settle personal or legal disputes

This policy is NOT intended to replace other policies that support raising concerns via the alternative channels outlined below:

- Assessment specialists / examiners reporting candidate or centre malpractice during marking or moderation, who should follow the normal procedure set out in the role-specific instructions from each product group (English, International Education or OCR):
 - Your own conflicts of interest should be declared via the relevant onboarding process, or be disclosed to declaration.disclosure@ocr.org.uk
 - Safeguarding: If you are aware of, or believe you have witnessed a safeguarding concern within one of our centres please refer to our [Global Safeguarding Policy](#) and the 'Report and Respond' section within that Policy.

- Centre staff, candidates, parents or the public, who should follow the guidance on our website pages:

[English](#)
[International Education](#)
[OCR](#)

How and when to Speak Up

How to Speak Up

In many situations, your manager will be in the best position to resolve your question or concern. However, if you don't have a direct manager or don't want / feel able to discuss an issue with your manager, you can contact any of the people and groups listed below:

- **Our Speak Up Portal** – where you believe that the matter cannot be dealt with through other available channels, you can use our [Speak Up Portal](#) to raise concerns confidentially and anonymously in your own language. Our Speak Up Portal is available 24 / 7, 365 days a year. When raising a concern via the Speak Up portal, you will have the option to confirm your identity, remain partially anonymous or maintain 100 percent anonymity; all contact between those involved in an investigation can be made via the portal.
- **The Business Ethics and Compliance Team** – based in the UK, our Business Ethics and Compliance Team assists in overseeing our organisation-wide efforts to ensure that we conduct business with integrity and fairness. You can contact the team directly by emailing compliance@cambridge.org, or you can email our [Group Director, Business Ethics and Integrity](#), or you can call on +44 (0)1223 325688.

- Any member of the **Executive Board**
- A member of the **People and Culture Team**
- Any documents that may support your report

If you are an Assessment Specialist and would like to make a complaint about your own personal circumstances, such as the way you have been treated during any dealings with Cambridge or health and safety matters, you should contact either your Cambridge contact or your manager in the first instance, or one of the alternative channels listed below:

English Speaking Team:
Email: speaking@cambridgeenglish.org
Tel: +44 (0)1223 553900

English Writing Team:
Email: writingteam@cambridgeenglish.org

International Education:
Assessor Development
Email: assessor.development@cambridgeinternational.org
Tel: +44(0)1223 553500

OCR
Email: complaints@ocr.org.uk

What information should be provided?

When you speak up (in person, in writing, online or by phone), please provide as much detailed information as you can to enable us to assess and investigate your concern, such as:

- The background, history and reason for the concern
- Names, dates, places and other relevant information

When to Speak Up

Cambridge depends upon its employees, temporary and agency staff, consultants, contingent workers, contractors, Assessment Specialists and other third parties providing services to Cambridge to ask questions or raise concerns so that we can take appropriate action.

We encourage you to speak up as soon as possible. If you know about or suspect misconduct, speak up with the facts that you have. We do not expect you to have all the answers and you are not expected to prove that your concern is well founded, though we will need enough information to be able to investigate properly. Please do not investigate the matter yourself. We guarantee that no disciplinary measures or other steps will be taken against you if your genuine concern later turns out to be mistaken or misguided.

If you are unsure whether you should speak up or would like some advice about something you have seen or heard, you can anonymously use the **Ask a Question** feature of our Speak Up Portal.

Confidentiality and non-retaliation

Will reports remain confidential?

All reporting is done confidentially, which means that information about your concern will only be shared with a limited number of people on a strictly need-to-know basis. Information will only be disclosed outside this small group if we are required to do so by law or if an important public interest is at stake. You can help us protect confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

Can concerns be raised anonymously?

Concerns can be raised anonymously. If you do raise a concern anonymously, all contact can be made via the Speak Up Portal; just log back into the Portal using the access number and password created when raising the concern to view any messages, provide additional information and receive status updates.

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How are those who speak up protected?

We encourage you to speak up about misconduct. Anyone speaking up in good faith will not suffer for raising concerns. Any form of threat or retaliation will not be tolerated. Retaliation against someone who has raised a concern is treated as a violation of our Code of Ethics and can be grounds for disciplinary action, including dismissal.

What is retaliation?

Retaliation is when adverse action is taken against an employee who has raised a concern. Retaliation can take many forms, such as demotion, suspension, dismissal, adverse impacts on working conditions or denying employee benefits, or creating a hostile or intimidating work environment.

What happens if you notice retaliation?

If you see or believe retaliation is taking place against you or someone else for raising a concern about suspected misconduct, you should report this via the Speak Up Portal. Employees who have raised a concern in good faith will be contacted periodically after an investigation has been completed to ensure they are not experiencing retaliation.

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What happens when a concern is raised?

What to expect if you Speak Up

If you are a Cambridge employee and raise a concern to a line manager they will:

- **Listen carefully:** Remembering that the person who has approached them has done something difficult and very important.
- **Respond respectfully:** Take every concern seriously, even if they disagree or have questions about the reporter's motives. Make sure the reporter knows they are committed to addressing the issue.
- **Protect confidentiality:** Avoid discussing the conversation with others and only share details on a need-to-know basis.

If you are either a Cambridge employee or an external third party, and raise a concern via any of the other channels described in this policy, we will:

- **Listen carefully:** Depending on the nature of your concern, we will aim to give you an indication of how we propose to deal with the matter. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal. In certain circumstances it may also be necessary for us to report the matter to the authorities.

- **Respond respectfully:** We will contact you as soon as possible to discuss your concern. If you wish to involve a friend or colleague to support you, please make us aware of this. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. If the matter is being handled internally, we will provide you with a timeframe for updates and details of who to contact for further information.
- **Protect confidentiality:** We will only share details of the concern raised to a small group of people on a need-to-know basis. Where possible and appropriate, we will keep you informed of the decisions that have been taken and the outcome of any enquiries / investigations that have been made. It may not be appropriate to do this in all cases; for example, we will not be able to inform you of anything which would infringe the duty of confidentiality owed to others, or would compromise other open investigations or constitute a breach of data protection laws.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will handle the matter fairly and properly. By following this policy you can help us to achieve this.

How investigations are handled

Cambridge follows a two-phased approach when handling concerns:

- **Initial review**
 - We assess the concern and decide if it requires further review and investigation (and, if so, by whom and in which form)
 - We may ask you for additional information

- **Investigation**

- If required, the investigation itself focuses on an objective, factual analysis of the case. If needed, we may involve outside experts (e.g. lawyers or accountants) to support under strict rules of confidentiality.
- We will carry out our review and investigation in an independent, fair and unbiased way for all parties involved and following relevant laws and ethical principles

Participating in an investigation

If you become involved in an investigation, or are asked to provide information relating to an investigation, we ask you to cooperate and answer all questions completely and honestly. Failure to cooperate with an investigation may lead to disciplinary action. All parties involved are entitled to confidentiality in order to avoid unnecessary damage to their reputation. So if you participate in or learn about an investigation, please keep the matter confidential.

Seeking guidance

If you have any questions relating to this Speak Up Policy Statement, please contact the Business Ethics and Compliance team – compliance@cambridge.org



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