Institute and Faculty of Actuaries

IFoA Speaking Up Procedure

V3 2026

1. Scope of the IFoA Speaking Up Procedure

1.1 This Procedure explains the process which is followed when concerns are raised about an IFoA incident, event, service or behaviour under the IFoA Speaking Up Charter and Policy.

1.2 This Procedure does not impose any regulatory requirements or obligations on IFoA Members, nor is it intended as guidance on regulatory requirements or obligations. It does not vary or change in any way IFoA Members' obligations under the Actuaries' Code. For Members, the Code requirements on speaking up and accompanying Guidance take precedence in the event of any conflict.

2. Raising concerns under the IFoA Speaking Up Charter

2.1 We aim to encourage openness for genuine concerns to be raised, even if they turn out to be mistaken. We do not encourage the raising of concerns under the Speaking Up Charter anonymously. Proper investigation will be difficult if not impossible if we cannot obtain further information from you. It would also be more difficult to establish whether allegations are credible or to provide you with any feedback. If you are concerned about possible negative repercussions if your identity is revealed, you should speak to IFoA's Chief Executive Officer (CEO) or one of the other contact points listed in 3.3 below. Any concerns raised under Speaking Up will be regarded as confidential and only shared on a "need to know" in basis in order to properly investigate and consider the concern raised.

2.2 If you have any queries about the IFoA Speaking Up Charter, Policy and/or Procedure, please contact us by email at speakingup@actuaries.org.uk Please note that this mailbox is monitored by the CEO team. If you consider it inappropriate for the CEO or their team to receive your notification of your concern because it is about them, please consider contacting one of the other individuals listed in 3.3 below.

2.3 Please be aware that any material or documentation which is submitted or created under this Procedure may be shared in the context of other processes as considered necessary or appropriate by the IFoA.

3. How to raise your concern under the IFoA Speaking Up Charter

3.1 *Informal resolution:* before taking a formal route via the Speaking Up Charter, we encourage you to try and resolve your concern informally. This may be done by speaking with an IFoA contact you feel comfortable sharing your concern with. It may be that an informal discussion resolves the matter without further action.

3.2 *Formal resolution:* if you have been unable to resolve your concerns informally or you feel that the matter is more serious, please use the IFoA Speaking Up Form to raise your concern.

3.3 Your completed form should provide as much information as you can. The completed form should then be sent to speakingup@actuaries.org.uk As noted above, this mailbox is monitored by the CEO team. If you do not consider it appropriate for your concern to be received by them, you can direct your completed form to one of the individuals listed below.

President of the IFoA	Paul Sweeting	paul.sweeting@actuaries.org.uk
Chief Executive of the IFoA	Paul Lewis	paul.lewis@actuaries.org.uk
Chair of IFoA Board	David Currie	david.currie@actuaries.org.uk
Chair of IFoA Audit and Risk Committee	Tony O'Riordan	tony.oriordan@actuaries.org.uk
IFoA Chief Operating Officer	Anne Moore	anne.moore@actuaries.org.uk
Chief Membership Officer	Ana Barco	ana.barco@actuaries.org.uk
Chief Regulation & Policy Officer	Emma Gilpin	emma.gilpin@actuaries.org.uk
Chief Technology & Transformation Officer	Emma Faulder	emma.faulder@actuaries.org.uk
IFoA Head of Human Resources	Jo Williams	jo.williams@actuaries.org.uk

3.4 The form includes sections for you to describe:

a) The nature of your concern or of the issue to be reported;
b) Your reason(s) for believing that what you are reporting is an issue;
c) Times and dates when your concerns were raised;
d) Details of the location(s) concerned;
e) Details of any witnesses;
f) Whether any action has already been taken by anyone; and
g) What steps you have taken to attempt to resolve the matter.

3.5 Generally, the earlier you express your concern and the more detail you are able to provide the easier it is to take action. When completing the form you will need to demonstrate that there are reasonable grounds for your concern and that it is genuinely held. The form will help you to do this in a structured way.

4. What happens next

4.1 Having regard to the principles of good administrative decision making, the IFoA will consider your concern and determine whether it should be accepted for consideration under Speaking Up.

4.2 Your concern may not be accepted for consideration if 3 months or more have passed since the IFoA incident, event, service or behaviour giving rise to your concern, unless you are able to demonstrate good reason for not having raised your concern sooner.

4.3 Your concern may not be accepted for consideration if it is already being considered or has been considered under another IFoA process or is subject to external proceedings of any kind.

4.4 If your concern is not accepted by the IFoA for consideration, you will be informed in writing, together with the reasons why.

4.5 There is no right of appeal or review against a decision of the IFoA not to accept your concern for consideration under the Speaking Up Charter.

4.6 If your concern is accepted for consideration, an appropriate representative of the IFoA will be appointed to deal with your concern. An “appropriate representative” of the IFoA will be someone who is of appropriate seniority, is impartial and has had no prior involvement in the concern you have raised.

4.7 The IFoA representative will contact you within 10 working days of acceptance of your concern. Depending on the nature of your concern, it may be that you are able to resolve the matter after an initial discussion with the IFoA representative.

5. Investigation and outcome

5.1 Once your concern has been accepted for consideration there will be an initial assessment to determine the scope of any investigation which may need to take place. As part of the investigation you may be asked to provide further information, this may be in the form of correspondence, documents or orally in a meeting.

5.2 In some cases we may appoint an independent investigator or team of investigators (this may include internal auditors) including persons with relevant experience of investigations or specialist knowledge of the

subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

5.3 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 action taken as a result. You should treat any information about the investigation and its outcome as confidential.

5.4 If permitted to do so by law, we will advise you of the outcome of any investigation we undertake.

6. If you are not satisfied

6.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. Engaging with the Speaking Up process and providing as much information as you can about your concern you can help us to achieve this.

6.2 There is no right of appeal against an outcome reached or decision made as a result of investigating a concern under the Speaking Up Charter.

Version Control

Version	Date	Author/Revised by	Notes/Revisions
1	August 2023	IFoA Council	• New Policy
2	August 2025	Data Protection Officer	• Amended key contact details and moved these to appropriate place in main body • Removed appendices including IFoA Speaking Up Form • General review and update for clarity
3	November 2026	Data Protection Officer	• Amended key contact details
Review interval: Every 2 years		**Last reviewed:** November 2026	