



Whistleblowing Policy

Version 8.0



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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Rean Panesar	Aug 2018	Aug 2019	First Policy.
2.0	Rena Panesar	Aug 2019	Aug 2020	Updated
3.0	Rena Panesar	Aug 2020	Aug 2021	Updated
4.0	Rena Panesar	Aug 2021	Aug 2022	Updated
5.0	Rena Panesar	Aug 2022	Aug 2023	Updated
6.0	Rena Panesar	Aug 2023	Aug 2024	Updated
7.0	Rena Panesar	Aug 2024	Aug 2025	Updated
8.0	Policy Pros	Oct 2025	Oct 2026	Retemplated and updated.



Whistleblowing Policy

Introduction

Pathways LDN is committed to maintaining the highest standards of integrity, accountability, and financial probity in the delivery of all our training and apprenticeship programmes. We recognise that our employees and associated individuals are often the first to identify potential risks or wrongdoing.

This policy is designed to encourage all individuals to raise genuine concerns about potential malpractice, illegal acts, or financial mismanagement without fear of reprisal. We comply fully with the Public Interest Disclosure Act 1998 (PIDA), which protects whistleblowers who raise concerns in the public interest.

Purpose

The purpose of this policy is to:

- Encourage disclosure by establishing a clear, accessible, and confidential channel for all individuals to raise serious concerns (by blowing the whistle) about misconduct within the organisation.
- Ensure that any suspected misuse of public funds (DfE/ESFA funding) or any other breaches of policy, legal or ethical responsibilities are reported, investigated, and addressed swiftly.
- Reassure those who raise a concern in good faith that they will be protected from any detrimental treatment or victimisation as a result of their disclosure.

Who and what this policy applies to

This policy applies to all individuals working for or with Pathways LDN, including:

- Employees (permanent, temporary, and part-time).
- Directors.
- Self-employed contractors and consultants.
- Agency staff.

The policy covers disclosures related to actions that have occurred on company premises, at employer sites, or through company-related activities and communication channels.



Definitions

Whistleblowing (or blowing the whistle) occurs when a worker raises a concern about wrongdoing within an organisation.

A **whistleblower** is an individual who raises a whistleblowing concern.

Qualifying Disclosures: Qualifying disclosures are concerns which adversely affect those accessing our services, work colleagues, members of the public or the organisation itself that may relate to historical, current, or possible future wrongdoing. However, to qualify, they must be in the public interest.

Qualifying Disclosures may relate to:

- Criminal offences (or suspected criminal activity)
- Breaches of a legal obligation
- Miscarriages of justice
- Danger to the health and safety of any individual/group
- Damage to the environment
- A deliberate attempt to conceal any of the above.

Please note: Bullying and harassment are not qualified unless the matter is in the public interest.



Roles and Responsibilities

Directors

- Maintain oversight and ownership of this policy.
- Supporting line managers to investigate issues relating to whistleblowing.
- Ensuring that all whistleblowing concerns raised are taken seriously.
- Ensuring that whistleblowers are advised of any progress made (where appropriate).
- Ensuring that suitable action is taken to resolve concerns.
- Liaising with the relevant authorities as necessary.

Line Managers

- Ensuring that all whistleblowing concerns raised are taken seriously.
- Ensuring that whistleblowers are advised of any progress made (where appropriate).
- Ensuring that suitable action is taken to resolve concerns.
- Reporting to the Senior Management Team regarding whistleblowing concerns and actions taken.
- Fully cooperating with investigations.

Staff

- Raising genuine whistleblowing concerns in a timely manner and in line with the procedure and principles of this policy.
- Know what whistleblowing is and the process for making a disclosure.
- Make any disclosure in good faith.
- Fully cooperating with investigations.



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Principles

- Cooperation is key. Everyone is responsible for preventing wrongdoing by reporting it when it occurs.
- Public interest first. Do the right thing – raise concerns about wrongdoing that affects learners, staff, partners, public funds, or safety.
- Don't delay. Raise concerns as soon as possible, even if you only have a reasonable suspicion and not proof, so risks can be assessed and prevented.
- Concerns must always be raised in good faith. Making malicious or knowingly false reports may lead to action.
- Evidence preservation. Keep original proof safe, create read-only copies, and record access.
- No victimisation. Whistleblowers and witnesses will be protected from detriment. Retaliation is a disciplinary offence.

Legal Protection for Whistleblowers

Whistleblowers who are workers¹ are protected by law and should not be mistreated or lose their jobs, nor suffer any form of retribution, victimisation, or detriment due to their actions when raising a concern in good faith (meaning that they reasonably believe that the allegation is true).

Despite non-workers not being protected under the Act, at Pathways LDN, we promise that any staff member who raises a concern in good faith will not be subject to disciplinary action or other sanctions, even if the investigation finds the allegations unproven.

However, where allegations are made that are knowingly untrue and/or made for personal gain, we may seek to take disciplinary and/or legal action against the perpetrator.

¹ Workers includes employees, trainees, and agency workers and does not generally include staff who are genuinely self-employed, non-executives directors, etc.



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Limits to Protection Under PIDA

It is important to note that disclosure will not be protected under PIDA where an individual is committing an offence by making that disclosure, for example, by breaching the Official Secrets Act or Section 59 of the Data Protection Act.

Right to be Accompanied

While there is no legal right to be accompanied to meetings, we want whistleblowers to feel comfortable raising their concerns. Therefore, we will usually allow whistleblowers to be accompanied to any formal meetings by a colleague or trade union representative.

Likewise, those who are interviewed as part of an investigation may bring a companion to any formal meeting if they wish. This may be particularly wise if they are implicated in any wrongdoing and may face disciplinary action following the investigation.

Confidentiality

In any investigation, the whistleblower, anyone interviewed and/or involved in the investigation, and their companions will be expected to keep the information they are given access to and the identities of those involved confidential.

Note: whistleblowers who report their concerns to the media will, in most cases, lose their right to anonymity.

Raising Concerns Anonymously

Whilst we accept anonymous whistleblowing concerns, staff should be aware that it is not always possible for us to fully investigate a concern without a detailed account and/or the option to seek further information. It is, therefore, advisable for whistleblowers to reveal their identities.

Where a whistleblower wishes to make a claim confidentially, we will do our utmost to respect their request. However, we are unable to absolutely guarantee confidentiality.

If we are in a position where we cannot maintain confidentiality and so have to make disclosures, we will discuss the matter with the whistleblower first.



Procedure

Raising a Concern

If you are concerned about wrongdoing, you should, in the first instance, raise the matter with your line manager or directly with a Director (Paul or Rena).

Wherever possible, whistleblowing concerns should be raised in writing and should include the following:

- The background and history of any concerns; and
- Names, dates, and places (where possible); and
- The reasons why you are particularly concerned about the matter.

If you cannot raise their concern in writing, we ask that you speak to your line manager or a Director, who will help you to report and record the concern accurately.

Please note that **you do not need proof** at this stage, but may attach any evidence you do have to your written concern if doing so will not jeopardise any investigation.

Investigation

In the first instance, the addressee will usually make internal enquiries to determine whether the concern is believed to be credible. This may involve meeting with you to confirm receipt of your concern and gather as much detail as possible.

Where there are reasonable grounds to suspect that wrongdoing has occurred, a formal investigation will be conducted by an appropriately senior and impartial individual. The investigation will be kept confidential to ensure fairness to all parties.

In situations where impartiality cannot be maintained during a formal investigation, the matter may be passed on to a third-party external inspector for an unbiased review.

Note: Where serious crime has occurred and individuals are at risk, an internal investigation may be paused to allow the relevant authorities (such as the police) to complete their own investigation without interference.



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Conclusions and Lessons Learnt

Following the investigation, the Directors will decide what, if any, action should be taken.

The action taken will be recorded, and where appropriate, the investigator(s) will prepare a lessons learnt report to outline how Pathways LDN may better protect itself, its staff, its learners, its funders and its other stakeholders.

In addition, the Directors will:

- Refer concerns regarding the misuse of public funds, fraud, or serious mismanagement directly to the Department for Education (DfE)/Education and Skills Funding Agency (ESFA) via their established whistleblowing channels.
- Refer the matter to Local Authority Children's Social Care (or Adult Social Services) if a concern involves actual or potential abuse, neglect, or exploitation of a learner or apprentice.
- Refer the matter to the Police/National Crime Agency/Serious Fraud Office if a concern involves criminal actions.
- Refer the matter to the Information Commissioner's Office (ICO) if the concern involves serious breaches of the UK GDPR or Data Protection Act 2018.

Timescales

Due to the varied nature of whistleblowing concerns, it is not possible to lay down precise timescales for such investigations. However, the investigator will ensure that investigations are undertaken as quickly as possible without affecting their quality and depth.

If the investigation is a prolonged one, the investigator will endeavour to keep the whistleblower informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

Keeping Whistleblowers Informed

We will write to you to acknowledge your concern within 2 working days, and we will try to keep you updated as much as possible. However, we will only disclose facts about the final outcome where it is appropriate to do so and will not breach the confidentiality of other individuals.



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All written communications will be sent to their home address.

Raising the Matter Externally

In exceptional circumstances only and where you feel that you cannot make a disclosure to any of our managers/Directors, or if you have raised the concern and feel that it has not been properly dealt with, you may, by law:

- Contact Protect (<https://protect-advice.org.uk/>) for impartial advice.
- Inform an official (prescribed) person or body who has responsibility for your concerns. A list of these persons and bodies can be found [here](#).
- Seek legal advice.

Support for Whistleblowers

Pathways LDN will support anyone who raises a concern in good faith. A named contact (usually the manager or Director the concern was reported to) will stay in touch throughout, explain the steps, answer questions, and provide regular updates (as appropriate).

Whistleblowers are protected from detriment. If there is a risk to well-being or working relationships, we will consider temporary adjustments to duties, locations, or reporting lines, and we will offer access to pastoral support or counselling where available.

Reasonable adjustments will also be provided to meet any health or disability needs, including accessible formats and communication support.

Director Contact Details

Paul: paul@pathwaysldnlimited.com

Rena: rena@pathwaysldnlimited.com



Non-Compliance

Breaches of this policy include but are not limited to victimisation of a whistleblower, concealing evidence, or making malicious/vexatious claims for personal gain.

All deliberate breaches of this policy will be taken seriously and may lead to us taking action under our Disciplinary Policy and Procedure or otherwise applying the most appropriate sanctions.

Where appropriate, we will also involve the Police or other appropriate authorities/agencies concerning breaches.

Monitoring and Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.