Whistleblowing Policy

Policy Created: March 2023

Last Reviewed: February 2026

Next Review: February 2027 (or sooner if significant changes in legislation, guidance, or organisational activities occur)

Reviewed by: Laurence Clark

Responsible Officer: CEO

Approved by: CEO

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1. Introduction and Commitment

Pathways Associates CIC is a disabled-led Community Interest Company dedicated to enabling people with learning disabilities, autistic people, and their families to live the lives they choose as equals in their local communities.

The organisation is committed to being open, honest, and accountable, encouraging a free and transparent culture in dealings between the Board, colleagues, associates, Experts by Experience, and service users. Whistleblowing enables individuals to raise serious concerns about wrongdoing, malpractice, or risks without fear of reprisal, supporting early intervention and improvement.

As of February 2026, this policy aligns with the Public Interest Disclosure Act (PIDA) 1998 (as amended), ACAS guidance on whistleblowing (updated 2025), Protect charity best practice for small organisations, and the CIC Regulator's emphasis on ethical governance. It promotes a no-blame culture, integrating with our Freedom to Speak Up Policy (internal concerns) while focusing on protected disclosures. This policy supports our Safeguarding Adults and Children Policy (reporting harm), Duty of Candour Policy (transparency in errors), Complaints Policy (feedback mechanisms), Corporate Responsibility Policy (ethical standards), and Patient Safety Incident Response Policy (incident reporting).

It reflects our values of being led by lived experience (Experts by Experience co-design whistleblowing awareness), partnership (collaborating with external bodies like Protect or regulators), inclusion and respect (accessible, non-discriminatory processes), innovation (using confidential digital reporting tools), and integrity (transparent investigations and protections).

We commit to protecting whistleblowers, investigating concerns promptly, and learning to prevent future issues.

2. Scope

This policy applies to all whistleblowing concerns, including malpractice, illegal acts, health/safety risks, damage to the environment, or cover-ups. It covers protected disclosures under PIDA (e.g., criminality, miscarriages of justice, regulatory breaches). The policy applies to colleagues, associates,

volunteers, Experts by Experience, contractors, service users, families, and partners. It covers internal and external disclosures but encourages internal first. It does not cover personal grievances (use Grievance Policy) or anonymous reports (though considered where possible).

3. Key Objectives

The organisation aims to encourage safe, confidential reporting of serious concerns without fear of detriment. It seeks to investigate fairly and proportionately, protect whistleblowers under PIDA, learn systemically to improve practice and culture, comply with legal duties (e.g., reporting to regulators), and foster trust through transparency and support.

4. Core Principles

Concerns are treated seriously, with protections against retaliation (e.g., dismissal, victimisation). Confidentiality is maintained where requested, though anonymity limits investigation. Investigations are impartial, timely, and feedback-focused. No-blame learning aligns with our Just Culture. Accessibility ensures easy-read forms, advocates, and support for disabled whistleblowers. Proportionality tailors responses to our small CIC.

5. Roles and Responsibilities

The Board provides strategic oversight and receives quarterly anonymised reports. The CEO holds overall accountability and appoints a Whistleblowing Champion (independent if needed). The Whistleblowing Lead (Lynn James-Jenkinson) receives reports, advises, and coordinates investigations. Line managers support reporters and cooperate with enquiries. All colleagues, associates, and volunteers report concerns promptly and support a positive culture. External experts (e.g., Protect) are consulted if complex.

6. Procedures

Raise concerns verbally or in writing to your line manager, Whistleblowing Lead, CEO, or Board member. For external: Protect (020 3117 2520), CQC (03000 616161), or police if criminal. Anonymous options are available via email or post.

The process includes:

- Acknowledgement within 2 working days
- Assessment for investigation (within 5 days)
- Impartial enquiry (aiming for 20 working days)
- Feedback on outcomes and actions
- Appeal to the Board if dissatisfied

Protections: No detriment; support (e.g., counselling). Malicious reports may lead to disciplinary action.

7. Training, Awareness, and Support

Annual whistleblowing training is provided for all (accessible, covering PIDA rights and processes). Induction includes policy briefing. Awareness is raised via posters, easy-read guides, and team meetings. Support includes confidential advice from Protect, wellbeing checks, and advocacy.

8. Monitoring, Review, and Continuous Improvement

The policy is reviewed annually or post-incident. Monitoring occurs via logs, audits, and feedback. Learning is co-produced with Experts by Experience. Feedback is welcomed; annual anonymised summaries are in the CIC report.

9. Conclusion

Pathways Associates CIC is dedicated to a whistleblowing culture that promotes safety, ethics, and improvement. By protecting reporters, investigating transparently, and learning together, we uphold our disabled-led values and ensure trust for better outcomes.