

Path Hill Outdoors Whistleblowing Policy

Status:	Updated Policy Date:	Scheduled Review:
Statutory	September 2025	September 2026

Policy Statement

Path Hill Outdoors is committed to maintaining the highest standards of honesty, openness and accountability and recognises that all its employees have an important role to play in achieving this goal.

Staff are usually the first to know when someone inside or connected to the organisation is doing something illegal or improper, but often feel apprehensive about voicing their concerns. This may also be because they do not feel their concerns will be taken seriously or because they feel they will be victimised, bullied or even dismissed as a result. Path Hill Outdoors does not believe that it is in anyone's interests for employees with knowledge of wrongdoing to remain silent. Path Hill Outdoors takes all malpractice and impropriety seriously, whether managers, staff, contractors or volunteers commit it. This document sets out a procedure whereby employees can report their concerns to the organisation.

It is important to recognise that this procedure is primarily about resolving problems to the mutual benefit of all, rather than allocating blame. However, there may inevitably be some cases where resolution to everyone's satisfaction, may not be feasible.

While Path Hill Outdoors cannot guarantee that we will respond to concerns in the way every employee may wish, we will try to handle the matter fairly and properly. We believe that the following procedure provides a framework for us to do this.

Issues Covered By This Policy

It is impossible to give a complete list of the activities that constitute misconduct or malpractice but broadly speaking, Path Hill Outdoors would expect employees to report the following:

- Safeguarding issues that affect our students
- Criminal offences
- Failure to comply with legal obligations
- Miscarriage of justice
- Actions which endanger the health and safety of staff, students or members of the public
- Actions which cause damage to the environment
- Actions which are intended to conceal any of the above

It will not always be clear that a particular action falls within one of these categories and employees will need to use their own judgement. However, Path Hill Outdoors would prefer employees to report their concerns rather than keep them to themselves. If employees make a report in good faith then, even if it is not confirmed by an investigation, the concern will be valued and appreciated and the employee will not be subject to any detrimental action in connection with this matter. However, if employees make a false or malicious report, or report a concern for personal gain they may be subject to action being taken against them under Path Hill Outdoors' disciplinary procedure.

The Procedure

Making the concern known

Reports can be made either orally or in writing. Path Hill Outdoors would normally expect employees to raise their concerns with the Director. However, if the employee believes that this Director is either involved in the wrongdoing or is aware of the concern and is condoning the action then the employee should raise the issue with another Director.

All matters raised under this procedure will be dealt with as confidential information. Any information will only be based on a strictly "need to know" basis.

When raising the initial concern and throughout any subsequent investigation, the employee may be accompanied by a trade union representative or fellow Path Hill Outdoors employee.

Proving the Concern

Path Hill Outdoors does not expect employees to have absolute proof of any misconduct or malpractice that they report. However, employees will need to be able to show reasons for their concerns.

Anonymity

Path Hill Outdoors will do everything possible to keep the employee's identity secret, if that is the employee's request. However, there may be circumstances (for example, if the report becomes the subject of a criminal investigation) wherein the employee is required as a witness. Should this be the case Path Hill Outdoors will discuss this with the employee at the earliest opportunity.

In exceptional circumstances, a concern may be raised anonymously. Whilst in many respects this may appear unsatisfactory, there may be a justifiable reason for this anonymity. As a result, the concern should still be investigated as if the identity of the complainant were known.

Investigating the report

Once a report has been received, the employee will receive an acknowledgement within five working days. There are of course, two sides to every story and Path Hill Outdoors will need to make

preliminary inquiries to decide whether a full investigation is necessary. If such an investigation is necessary then, depending on the nature of the misconduct, the concerns will either be:

- Investigated (by Management, Finance, etc)
- Referred to the appropriate external person (for example our auditors, police, regulatory authority, partner organisation etc) for investigation.

Keeping the complainant informed

Subject to any legal constraints, Path Hill Outdoors will inform the employee who raised the concern of the outcome of any investigation(s) and, where possible, any action that has been taken. If as a result of a concern being raised under this procedure, disciplinary action is taken against a member of staff, the employee(s) involved in raising the concern do not have a right to any information arising from the discipline process. The Discipline Procedure is confidential.

Appealing against the decision

If you are unhappy with the outcome of an investigation Path Hill Outdoors would prefer that the employee submits another report explaining why this is the case. Employees may submit this to any Director. Concerns will be investigated again if there is good reason to do so.

Raising the concern externally

It may be that the employee does not feel that it is appropriate to raise the matter again internally and they wish to raise their concerns with another organisation, such as a regulator. This is of course an option for employees providing they have enough evidence to support their concerns.

Path Hill Outdoors strongly advises that before reporting any concern externally, employees seek advice from Public Concern at Work (020 7404 6609, whistle@pcaw.org.uk or <http://www.whistleblowing.org.uk>), an independent charity that promotes good practice, compliance with the law and accountability in the workplace.

Where the complaint involves an employee working for an external organisation, the employee concerned should raise the matter with their Line Manager, who will ensure that a decision is made regarding this issue. If Path Hill Outdoors feels that it is necessary to raise the issue with the other organisation, it is likely that the complaint will be raised with the external organisation using their complaints procedure, as the whistle blowing legislation only covers employees; therefore it would not be appropriate to use this procedure to raise the issue.

If Path Hill Outdoors does not support the employees concern and decides not to pursue the matter, the employee is able to raise the matter externally (see above for guidance).

Reviewed by

A handwritten signature in black ink, appearing to read "Julia Warwick".

Julia Warwick- Director September 2025