

Leaders in music, disability & technology



WHISTLEBLOWING POLICY

Updated: September 2025

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1. Introduction

- 1.1 Drake Music is committed to the highest possible standards of openness, integrity and accountability. We expect employees, and others that we deal with, who have serious concerns about any aspect of the work that we do to come forward and voice those concerns.
- 1.2 The purpose of this Policy and the accompanying Whistleblowing Procedure is to make it clear that you can raise your concerns in confidence without fear of victimisation, subsequent discrimination or disadvantage. Drake Music encourages you to raise serious concerns in the first instance within the organisation, rather than overlooking a problem or 'blowing the whistle' outside, and we would rather that you raised the matter when it is just a concern rather than waiting for proof.
- 1.3 You may feel that speaking up would be disloyal to your colleagues or to the charity. You may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- 1.4 You should continue to raise appropriate concerns with relevant external agencies such as the Health and Safety Executive and the Charity Commission.
- 1.5 The Policy and Procedure applies to all employees and those contractors working for or on behalf of Drake Music, for example, agency staff and associates. It also covers suppliers and those providing services under a contract with the charity in their own premises, the premises of another contractor, and other sites. The Policy also applies to organisations working in partnership with Drake Music.
- 1.6 The Policy has been prepared in response to the Public Interest Disclosure Act 1998 in accordance with Government guidance on the issue.
- 1.7 Drake Music recognises employees/contractors/associates may wish to seek advice and be represented by their trade union representative when raising a concern under the Policy and acknowledges and endorses the role trade union representatives play in this area.

2. Aims and scope of the Policy

- 2.1 This Policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns.
- provide avenues for you to raise those concerns and receive feedback on any action taken.
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have raised any concern in good faith.

2.2 There are existing procedures in place to enable employees to lodge grievances relating to their employment. The Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures, including the charity's Complaints Procedure. This Policy therefore includes your concerns about: -

- conduct which is an offence or a breach of law.
- harassment of others; *
- sex, race or disability discrimination against others; *
- disclosures related to miscarriages of justice.
- health and safety risks, including risks to the public as well as other employees.
- damage to the environment.
- the unauthorised use of public funds.
- possible fraud and corruption.
- sexual or physical abuse of clients.
- breaches of Drake Music's Standing Orders, and policies.
- anything that makes you feel uncomfortable in terms of known standards, your experience or the standards you believe Drake Music subscribes to; or
- other unethical or improper conduct (not otherwise included in this list)
- concealing information about any of these matters.

*Complaints relating to harassment of, or discrimination against, you will be dealt with under the specific procedures relating to those matters.

2.3 It should be emphasised that this Policy is intended to assist individuals who have discovered malpractice or serious wrongdoing, provided they make the disclosure in accordance with the Policy. It is not designed to question financial, or business decisions taken by Drake Music nor may it be used to reconsider any matters that have already been addressed under the harassment, complaint or disciplinary procedures. Individuals who make disclosures outside the arrangements set out here will not be protected under this Policy and may not be protected under the Act.

3. Drake Music's promise to you

- 3.1 Drake Music is committed to good practice and high standards and wants to be supportive of employees and others who work for the charity.
- 3.2 Drake Music recognises that the decision to report a concern can be a difficult one to make. If you raise your concern based on reasonable belief and in good faith, you have nothing to fear because you will be doing your duty to your employer and the public and The Public Interest Disclosure Act 1998 will protect you from dismissal or other detriment. If your concern is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.
- 3.3 Drake Music will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith, even if you are genuinely mistaken in your concerns. Any harassment or victimisation of a whistleblower may result in disciplinary action against the person responsible for the harassment or victimisation.
- 3.4 Any investigations into allegations arising from your whistleblowing will not influence or be influenced by any other HR procedures to which you may be subject.

4. Confidentiality

- 4.1 All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. If we are not able to resolve your concern without revealing your identity (e.g., because your evidence may be needed in Court), we will discuss this with you.

5. Anonymous allegations

- 5.1 This policy encourages you to put your name to your allegation whenever possible.
- 5.2 Concerns expressed anonymously are much less powerful but may be considered by Drake Music, taking into account:
 - the seriousness of the issues raised;
 - the credibility of the concern; and
 - the likelihood of confirming the allegation from attributable sources.
- 5.3 The Chief Executive Officer will decide in each case whether a complaint made anonymously should be investigated.

6. The responsible officer

- 6.1 The Chief Executive Officer has overall responsibility for the maintenance and operation of this Policy. Confidential records will be kept in relation to concerns raised, including any investigations and outcomes. If the concerns relate to the Chief Executive Officer then all reporting is via the Trustee Board of the Charity.

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Procedures

1. How to raise a concern

- 1.1 As a first step, you should normally raise concerns with your immediate manager, Chief Executive Officer or if you wish your Trade Union. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.
- 1.2 If you are unsure whether or how to raise a concern you can contact the independent voluntary organisation Protect on 020 3117 2520 or via <https://protect-advice.org.uk/contact-protect-advice-line/> for guidance.
- 1.3 Concerns may be raised orally or in writing. Drake Music encourages you to identify yourself when raising your concern, but if you wish you may remain anonymous.
- 1.4 The CEO is the Officer responsible for this Policy, they will be informed of all concerns raised under the Policy.
- 1.5 If you believe that senior management is involved, or if you are not satisfied with your Chief Executive Officer's response to your concerns, you should approach the Chair of the Trustee Board.

- 1.6 The earlier you express the concern the easier it is to take action.
- 1.7 Although you are not expected to provide proof for your concern, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.
- 1.8 You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.
- 1.9 You may invite your trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised. Any meetings that need to be arranged with you can be held off-site if you wish.
- 1.10 If you are not an employee of Drake Music, we would prefer that you raise your concern in the first instance with the Chief Executive Officer.

2. How Drake Music will respond

- 2.1 Whoever you raise your concerns with, normally your Chief Executive Officer, a person not associated with the matter may be appointed to look into it. You will be informed who this person is. Confidentiality will be maintained in accordance with Section 4 of the Whistleblowing Policy.
- 2.2 In order to protect individuals and those accused of misdeeds or possible malpractice, this un-associated person will carry out initial enquiries in order to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the charity has in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection, harassment or discrimination issues) will normally be referred for consideration under those procedures.
- 2.3 Following these initial enquiries, Drake Music will respond to your concerns as appropriate. Your concern may: -

- be investigated by management, internal audit, or through the disciplinary process.
- be referred to the police.
- be referred to an external auditor or specialist.
- form the subject of an independent inquiry.

- Some concerns may be resolved by action agreed with you without the need for formal investigation. If urgent action is required, this will be taken before any investigation is conducted.
- 2.4 Within seven working days of a concern being raised, the person appointed to look into it will contact you (in a way which does not arouse suspicions in your workplace):
- acknowledging that the concern has been received.
 - indicating how we propose to deal with the matter.
 - giving an estimate of how long it will take to provide a final response.
 - telling you whether any initial enquiries have been made.
 - supplying you with information on staff support mechanisms.
 - advising you of your entitlement to seek advice and representation from your trade union representative.
 - telling you whether further investigations will take place and if not, why not.
 - agree with you how to proceed if you have chosen to remain anonymous.
- 2.5 Drake Music will do what it can to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the charity will arrange for you to receive advice about the procedure and other appropriate support.
- 2.6 Drake Music accepts that you need to be assured that the matter has been properly addressed. Subject to legal constraints and any confidentiality or other issues, we will inform you of the outcome of any investigation.

3. How your concerns can be taken further

- 1.1 This Procedure is intended to provide you with an avenue within Drake Music to raise concerns. If you are unsure whether or how to raise a concern you can contact the independent voluntary organisation Protect on 020 3117 2520, for guidance.
- 1.2 Drake Music hopes you will be satisfied with any action taken as a result of raising a concern. If you are not, and if you feel it is right to take the matter outside the Charity, the following are possible contact points:
- Citizens' Advice
 - your union representative
 - relevant professional bodies or regulatory organisations
 - the police

- 1.3 If you do take the matter outside the organisation, you should be careful not to disclose confidential information, and ensure that you comply with the requirements of the Public Interest Disclosure Act 1998 so that you do not lose the protection of the Act against dismissal or other detriment. Seek advice from the contact point about this.

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