



XYZ MUSIC ACADEMY LTD

Whistleblowing Policy

Policy Owner: Managing Director
Approved By: XYZ Music Academy Ltd
Review Date: Annually
Version: 1.0

1. Policy Statement

XYZ Music Academy Ltd is committed to conducting its activities with honesty, integrity, openness, and accountability. We encourage all employees, workers, contractors, volunteers, tutors, and stakeholders to raise genuine concerns about wrongdoing, malpractice, safeguarding concerns, or unlawful conduct without fear of retaliation.

This policy provides a framework for reporting concerns that are believed to be in the public interest and ensures that all disclosures are handled fairly, consistently, and confidentially.

XYZ Music Academy is committed to creating a culture where individuals feel confident to speak up when something appears wrong.

2. Purpose

The purpose of this policy is to:

- Encourage individuals to report concerns at an early stage.
 - Provide a clear procedure for reporting concerns.
 - Protect individuals who raise concerns in good faith.
 - Ensure concerns are investigated appropriately.
 - Promote transparency and accountability across the organisation.
 - Support the safeguarding and welfare of children, young people, vulnerable adults, staff, and stakeholders.
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3. Scope

This policy applies to:

- Employees
- Directors
- Managers
- Tutors
- Contractors
- Consultants
- Volunteers
- Agency workers
- Apprentices
- Work experience students

This policy applies to concerns arising in relation to any activities undertaken by XYZ Music Academy Ltd.

4. What is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected wrongdoing, illegal activity, malpractice, or risks to others.

Examples include:

Safeguarding Concerns

- Abuse or neglect of a child.
- Failure to follow safeguarding procedures.
- Failure to report safeguarding concerns.
- Inappropriate conduct towards students.

Criminal Activity

- Fraud.
- Theft.
- Financial misconduct.
- Bribery.
- Corruption.

Health and Safety Concerns

- Unsafe working conditions.
- Failure to comply with health and safety legislation.
- Risks to staff, students, or visitors.

Professional Misconduct

- Breaches of professional standards.
- Serious breaches of company policies.
- Abuse of position.

Legal or Regulatory Breaches

- Breaches of legislation.
- Failure to comply with statutory duties.
- Data protection breaches.

Other Concerns

- Deliberate concealment of wrongdoing.
- Serious damage to the environment.
- Misuse of company funds or resources.
- Actions that could bring XYZ Music Academy into disrepute.

5. Matters Not Covered by this Policy

This policy is not intended for:

- Personal grievances.
- Employment disputes.
- Pay concerns.
- Interpersonal disagreements.
- Performance management concerns.

These issues should be addressed through the appropriate company procedures, such as:

- Grievance Policy
- Disciplinary Policy
- Complaints Procedure

However, where a personal grievance also raises wider public interest concerns, it may be considered under this policy.

6. Protection for Whistleblowers

XYZ Music Academy will not tolerate retaliation against any individual who raises a concern in good faith.

No individual will suffer:

- Dismissal.
- Disciplinary action.
- Loss of opportunities.
- Harassment.
- Victimisation.
- Unfair treatment.

because they have raised a genuine concern.

This protection applies even if an investigation concludes that no wrongdoing occurred, provided the concern was raised honestly and in good faith.

7. Confidentiality

All concerns will be handled confidentially wherever possible.

The identity of the individual raising the concern will only be disclosed where:

- Permission has been given.
 - Disclosure is required by law.
 - Disclosure is necessary to conduct a fair investigation.
 - Safeguarding obligations require disclosure.
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8. Anonymous Disclosures

Anonymous disclosures will be considered.

However, anonymous reports may be more difficult to investigate thoroughly.

Individuals are encouraged to provide contact details wherever possible.

9. How to Raise a Concern

Concerns should be raised as soon as possible.

Individuals should provide:

- Details of the concern.
- Relevant dates and times.
- Names of individuals involved.
- Any supporting evidence available.

Concerns can be reported to:

Stage 1 – Line Manager

Where appropriate, concerns should initially be raised with the individual's line manager.

Stage 2 – Senior Management

If the concern relates to the line manager, or if the individual feels unable to report to them, concerns should be raised directly with:

Managing Director

XYZ Music Academy Ltd

or

Designated Safeguarding Lead (DSL)

where safeguarding concerns are involved.

10. Safeguarding Concerns

Any concern relating to:

- Child protection.
- Abuse.
- Neglect.
- Exploitation.
- Radicalisation.
- Harm to a vulnerable adult.

must be reported immediately to the Designated Safeguarding Lead.

The whistleblowing process must never delay a safeguarding referral.

Where necessary, referrals will be made to:

- Children's Social Care.
- Adult Social Care.
- Police.
- Local Authority Designated Officer (LADO).

In accordance with safeguarding procedures.

11. Investigation Process

Upon receipt of a concern:

Step 1: Acknowledgement

The concern will be acknowledged within five working days where possible.

Step 2: Initial Assessment

A senior manager will determine:

- Whether the concern falls under this policy.
- The level of risk involved.
- Whether immediate action is required.

Step 3: Investigation

An appropriate investigation may include:

- Interviews.
- Review of records.
- Collection of evidence.
- Consultation with external agencies.

Step 4: Outcome

Where appropriate, the whistleblower will receive feedback regarding:

- Whether the concern was investigated.
- Whether action has been taken.

Confidentiality obligations may limit the detail that can be shared.

12. Malicious or False Allegations

XYZ Music Academy encourages genuine concerns.

However, allegations that are knowingly false, malicious, or made with the intention of causing harm may result in:

- Disciplinary action.
 - Termination of contracts.
 - Further legal action where appropriate.
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13. External Disclosures

The organisation encourages concerns to be raised internally first where possible.

However, individuals have the right to raise concerns with appropriate external bodies, including:

- The Police
- The Health and Safety Executive (HSE)
- Local Authority Safeguarding Teams
- The Information Commissioner's Office (ICO)
- HM Revenue & Customs (HMRC)
- The Charity Commission (where applicable)

Individuals should seek advice before making disclosures externally.

14. Record Keeping

XYZ Music Academy will maintain secure records of:

- Concerns raised.
- Investigations conducted.
- Actions taken.
- Outcomes reached.

Records will be retained in accordance with the company's Data Protection Policy and applicable legislation.

15. Monitoring and Review

The Managing Director will monitor the effectiveness of this policy and review it annually or sooner if:

- Legislation changes.
- Regulatory requirements change.
- Serious incidents occur.
- Organisational changes require revision.

16. Related Policies

This policy should be read alongside:

- Safeguarding & Child Protection Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- Disciplinary Policy
- Grievance Policy
- Complaints Policy
- Health & Safety Policy
- Data Protection Policy
- Equality, Diversity and Inclusion Policy

Policy Approval

Approved by: Managing Director, XYZ Music Academy Ltd

Effective Date: June 2026

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