



**apollo
music
projects**

inspiring children
through music

Apollo Music Projects Complaints, Concerns and Whistleblowing Policy.

Overview

This policy is addressed to 'you', whether you are a trustee, director, member of staff, musician, beneficiary, any other individual or organisation with a relationship with us or a member of the general public.

If you're unhappy about a service we provide to you, or have concerns about anything related to our organisation, please let us know. By doing this you will give us an opportunity to put things right and help prevent future problems.

We believe that it is best to resolve issues informally whenever possible. We hope that, by offering you the chance to give us feedback via questionnaires and/ or informal discussion, we can understand what has happened and resolve any problems before a more formal approach is adopted.

Complaints and Concerns – Formal Process

If you would like to raise an issue more formally, you should do this promptly, providing as much information as possible. You can do this:

- verbally to the most senior Apollo representative available*; or
- in writing (marked 'PRIVATE & CONFIDENTIAL') and handed to the most senior Apollo representative available*; or
- by email to info@apollomusicprojects.org or to the most senior Apollo representative available*; or
- in writing (marked 'PRIVATE & CONFIDENTIAL') and sent to the CEO & Programme Director, Apollo Music Projects, 43, Clifden Road, London E5 0LL.

*If you have concerns about raising issues with specific individuals, are unsure about who to raise the issue(s) with, or if you believe that the issue you are raising qualifies (or may qualify) as a 'Serious Incident' under our Serious Incident Policy¹, you should raise your issue(s) by emailing the Board of Trustees at trustees@apollomusicprojects.org.

You may also raise your concerns with the Charity Commission.

Whistleblowing

There is statutory protection for staff who raise legitimate concerns about specified matters in the public interest. These are called 'qualifying disclosures'. A qualifying disclosure is one made by an employee who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;

¹ Under our Serious Incident Policy, a serious incident is one that has resulted in, or could result in, a significant loss of funds or a significant risk to the our work, beneficiaries or reputation.

- a breach of any other legal obligation; or
- concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. You have no responsibility for investigating the matter – it is the charity's responsibility to ensure that an investigation takes place.

If you make a protected disclosure you have the right not to be dismissed, subjected to any other detriment, or victimised, because you have made a disclosure.

Victimisation of an individual for raising a qualified disclosure is a disciplinary offence.

What to include in your communication

A clear description of the complaint or concern, including as appropriate:

- when and where any incident took place;
- what happened;
- who was involved;
- details of any witnesses;
- details of any issue(s) you are raising;
- why you are raising the issue(s);
- whether the issue has been reported elsewhere (e.g. to the Charity Commission); and
- your suggestions as to how any issues can be resolved and/or your desired outcome.

Process

Any issue raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome reported back to you. It may not always be possible to share all details of the outcome with you: for example, where a duty of confidentiality is owed to someone implicated, such as a member of staff.

We may have to report some matters raised to the Charity Commission in line with our duties as a charity registered with that body.

Unless implicated and absent any other conflict of interest, the CEO and Programme Director will be responsible for the handling of your complaint or concern. If it is necessary in order to avoid conflicts of interest and/or ensure independence, or a Serious Incident is involved, a Trustee or other suitable person will be responsible.

You will receive an acknowledgment within 3 working days and, wherever possible, we will seek to conclude our inquiries and communicate the outcome to you within 28 days. In some cases, this may take longer.

We recognise that raising issues can sometimes be stressful and that assistance and support may be required by those involved and affected.

We may need to seek further information from you. If we do, your further cooperation will help us to reach the right outcome.

Where appropriate, an investigation will be carried out by someone who is independent from the issues raised in order to establish the underlying facts.

Feedback and updates will be provided where possible.

Depending on whether or not the complaint or concern is substantiated, its nature and any findings, appropriate and proportionate action will be taken to address any issues identified. If misconduct is

discovered as a result of any investigation under this procedure our disciplinary procedure will be used, in addition to any appropriate external measures.

Where appropriate, incidents may be reported to the police or other relevant authority.

We keep a record of all complaints and concerns raised and their outcomes all of which are reported to the Board of Trustees.

Confidentiality and Anonymity

All issues raised will be treated confidentially and your personal details will not be shared outside the process without your permission unless this is required for legal purposes.

If you decide to remain anonymous (such that your identity is unknown to anyone within the organisation – for example, by sending an anonymous letter or email), and we are unable to seek more information or clarification from you, this may mean that we are not able to investigate your concerns fully or, in some cases, at all. However, we will look into the issues as fully as we are able to, based on the information available.

Appeal Process

If you are unhappy with the outcome, you may appeal to the Chair of the Board of Trustees. If the Chair has a conflict of interest or is implicated in the issues raised then the Board of trustees will set up a panel to consider the appeal.

You must notify us of your appeal (and the reasons on which it is based) within 28 days of your being notified of the outcome. Notification should be given by email or in writing to the person who notified you of the outcome of the complaint or concern you raised.

We will seek to conclude our inquiries and communicate the outcome of your appeal to you within 28 days. The Chair's or panel's decision will be final.

This policy has been approved and endorsed by the Board of Trustees of Apollo Music Projects on 26 October 2023.

Next review date: October 2025.