Enemy of Boredom

Whistleblowing Policy

Approved by:	Steve Godwin, CEO
Date approved:	12th October 2026
Next review due by:	Within 12 months of approval, or sooner if legislation or statutory guidance changes
Policy owner:	Tracey Clark, COO
Applies to:	Everyone who works for or on behalf of Enemy of Boredom

1. Scope

This policy applies to everyone who works for or on behalf of Enemy of Boredom, whether paid or unpaid, including employees, tutors, volunteers, contractors, self-employed consultants providing services personally, and agency staff. This policy does not form part of anyone's contract of employment and may be amended at any time.

It should be read alongside our Child Protection and Safeguarding Policy, Complaints Policy, Staff Code of Conduct and Employee Handbook, which includes our grievance and disciplinary procedures.

Learners, parents and carers are not covered by this policy. They can raise a concern through our Complaints Policy or, if it is about a learner's safety, by speaking to the DSL.

2. Aims

This policy aims to:

- encourage anyone affected to report suspected wrongdoing as soon as possible, knowing that their concern will be taken seriously and investigated, and that their confidentiality will be respected;
- let everyone know how to raise a concern about potential wrongdoing;
- set out clearly how we will respond to a concern;
- explain the legal protection available to a person who raises a concern; and
- assure people that they will not be victimised for raising a genuine concern through the steps in this policy, even if they turn out to be mistaken.

3. Legal and statutory framework

Whistleblowing law is in Part IVA of the Employment Rights Act 1996, inserted by the Public Interest Disclosure Act 1998 and since strengthened, including by the Employment Rights Act 2025. It protects a worker from being dismissed or treated badly by us or by a colleague, because they have made a protected disclosure.

Since 6 April 2026, a disclosure that sexual harassment has happened, is happening, or is likely to happen is expressly a qualifying disclosure, in its own right, as well as being covered by our Equality and Diversity Policy.

We also act in line with our duties under Keeping children safe in education, which expects staff to feel able to raise concerns about poor or unsafe practice and potential failures in safeguarding, and with the national standards for non-school alternative provision, which expect a staff code of conduct that includes whistleblowing procedures.

The law protects your right to make a protected disclosure. No confidentiality clause, non-disclosure agreement or similar term in a contract or settlement agreement, however it is worded, can lawfully stop you making a protected disclosure in the public interest.

4. Definitions

Whistleblowing: raising a concern that reports wrongdoing which it is in the public interest to report. This is called a "protected disclosure" in law.

Whistleblower: a person who raises a genuine concern of this kind.

A qualifying disclosure is one the person making it reasonably believes tends to show one or more of the following has happened, is happening or is likely to happen, and reasonably believes is in the public interest:

- a criminal offence, such as fraud or corruption;
- a failure to comply with a legal obligation or statutory requirement;
- a miscarriage of justice;
- a danger to the health or safety of any individual, including a learner or a member of staff;
- that sexual harassment, as defined in the Equality Act 2010, has happened, is happening, or is likely to happen;
- damage to the environment; or
- a deliberate attempt to conceal any of the above.

In our setting this can include a breach of financial management procedures, a safeguarding failure, unsafe practice, a failure to follow safer recruitment requirements, abuse or neglect, inappropriate conduct towards a learner, or an attempt to conceal a safeguarding or welfare concern.

Not whistleblowing: a personal grievance, such as being bullied or harassed yourself, or a concern about your own employment contract, is not usually whistleblowing. Section 6 explains where to take this instead. Sexual harassment is different: reporting sexual harassment, including harassment of you,

can be a protected disclosure. You can raise it under this policy, the grievance procedure or section 10 of our Equality and Diversity Policy, and you are protected whichever route you use.

5. Roles and responsibilities

- **The COO** receives concerns under this policy, decides how they are investigated, and is responsible for its overall operation.
- **The Designated Safeguarding Lead** receives any concern that is also a safeguarding matter, alongside the COO.
- **The CEO** is involved in serious concerns, as set out in section 8, and receives concerns about the COO.
- **The Chair of the Board of Directors** receives a concern about the CEO.
- **All staff** are encouraged to raise a genuine concern, and to support a colleague who does.

6. Deciding where a concern should go

Before raising a concern, think about whether it is whistleblowing or something else, using the definitions in section 4.

- If it is a personal grievance, for example about your own treatment, pay or working conditions, use the grievance procedure in our Employee Handbook.
- If it is dissatisfaction with our provision or service, use our Complaints Policy.
- If it concerns the safety or welfare of a learner or adult at risk, it is a safeguarding concern. Report it to the DSL immediately, under our Child Protection and Safeguarding Policy, as well as raising it under this policy if it is also whistleblowing.
- If you are not sure, raise it anyway. We would rather hear a concern that turns out to be better dealt with elsewhere than not hear it at all. Protect, the whistleblowing charity, has free and confidential guidance and an advice line to help you decide.

7. How to raise a concern

Report your concern to the COO. You can do this in person, by phone, by video call or in writing, using a hr@eobacademy.com. You can also tell your Head of Centre or line manager, who will pass it to the COO on the same working day. If the concern is about the COO, or you believe they may be involved in wrongdoing, report it to the CEO. If it is about the CEO, report it to the Chair of the Board of Directors. Where the concern relates to safeguarding, also report it to the DSL immediately, in line with our Child Protection and Safeguarding Policy.

Raise your concern in writing wherever possible, including the names of those involved, dates, places, and as much evidence and context as you can. Tell us about any personal interest you have in the matter. You do not need to be certain that wrongdoing has happened, only to have a reasonable belief.

8. How we respond

The person who receives your concern (the recipient) will:

- meet with you. in person or by video call, usually within 10 working days, and sooner where a learner may be at risk You may bring a companion, such as a colleague, trade union or professional association representative; who is not involved in the concern and who must keep it confidential.
- get as much detail as possible and record it. If it becomes clear the concern is not whistleblowing, the recipient will pass it to the right policy or procedure under section 6;
- confirm to you that you are protected from unfair treatment or dismissal for raising the concern, unless you have knowingly made a false allegation, (section 10); and
- decide whether there is enough cause for concern to justify further investigation.

You will be given a copy of the written summary of your concern after the initial meeting. We will then tell you how it is being dealt with, and give an estimate of how long it will take to reach an outcome.

Safeguarding always comes first. Where a concern suggests a learner may be at risk, or that an adult who works with learners may have met the harm threshold, the DSL acts on it straight away under our Child Protection and Safeguarding Policy, including any referral to the LADO, children's social care or the police. The whistleblowing investigation will not delay or get in the way of that process.

Where further investigation is needed, the recipient arranges it, involving the Senior Leadership Team and the CEO where appropriate. The investigator will be someone who is not involved in the concern. In some cases we may need an external, independent investigator, and in others we may need to report the matter to the police, the LADO, the local authority or another regulator. We tell you how the matter is being investigated and when you can expect to hear about next steps. Throughout the investigation we check in on the wellbeing of both you and anyone the concern is about, and offer support where it would help.

We keep your identity confidential where you ask us to and where it is reasonably practicable, but we cannot always guarantee this, for example where the law requires disclosure, where safeguarding duties apply, where the police are involved, or where it is necessary to investigate the concern fairly. If we need to share your identity, we will talk to you first wherever we can. Everyone involved in handling a concern must keep it confidential and share it only with those who need to know. We consider anonymous concerns, although they can be harder to investigate, so we encourage you to give your name.

9. Outcome of the investigation

Once the investigation is complete, the investigator prepares a report on the findings, confirms whether wrongdoing has occurred, and recommends how to put things right and whether a referral is needed to an external body, such as the local authority, the LADO or the police.

We tell you the outcome, although we may need to withhold some details for reasons of confidentiality. The COO, and the Board of Directors where necessary, reviews the relevant policies and procedures to help prevent the same thing happening again. We cannot always guarantee the outcome you want, but we will deal with your concern fairly and appropriately. If you are not satisfied with how your concern has been handled, you can ask the CEO (or the Chair of the Board of Directors, if the concern involved the CEO) to review it, or raise it outside Enemy of Boredom as set out in section 12.

10. Malicious or vexatious allegations

We encourage everyone to raise a concern whenever they believe there may be an issue. If you raise a concern in good faith and the investigation finds no wrongdoing, you will not face disciplinary action. If an allegation is shown to have been deliberately invented or made knowing it to be untrue, we will consider whether disciplinary action against the person who made it is appropriate.

11. Protecting you from unfair treatment

We will not tolerate anyone being treated badly because they raised a genuine concern. This includes being bullied, ignored or excluded, being overlooked for training, or a fixed-term contract not being renewed because of the concern. Anyone who does this, including a colleague, may face disciplinary action which may be treated as gross misconduct.

Covering up wrongdoing, or pressuring someone not to report it, is also a disciplinary matter. Never agree to keep quiet about wrongdoing, even if a manager or someone more senior asks you to.

12. Escalating a concern beyond Enemy of Boredom

We hope every concern can be resolved internally, but you have the right to raise a genuine concern with a prescribed person or body outside Enemy of Boredom, particularly if you believe it has not been properly dealt with, or you reasonably believe you would be victimised for raising it here. Depending on the nature of the concern this may include the local authority, the LADO, the police, the Health and Safety Executive, or Ofsted. The gov.uk list of prescribed persons and bodies explains who to contact for different kinds of concern.

Where your concern is about safeguarding practice at Enemy of Boredom, you can also contact the LADO or children's social care directly, or use the NSPCC's whistleblowing advice line, which exists specifically to support staff raising this kind of concern.

It will very rarely, if ever, be appropriate to go to the media, and we strongly encourage you to seek advice before raising a concern outside Enemy of Boredom. Protect's free and confidential advice line can help you decide whether, and how, to raise a concern outside Enemy of Boredom, and what protection the law gives you.

13. Training

All staff are told about this policy at induction, and it forms part of annual safeguarding and Staff Code of Conduct training. The COO, the Chair of the Board of Directors and Heads of Centre receive additional training on handling a disclosure.

14. Monitoring arrangements

This policy is reviewed annually by the COO. At every review, the policy is approved by the CEO. It is reviewed sooner if legislation or statutory guidance changes. It is available to all staff, and to commissioners and the public on request.

15. Related policies

- Child Protection and Safeguarding Policy
- Complaints Policy
- Staff Code of Conduct
- Equality and Diversity Policy
- Data Protection Policy