Esgobaeth Llandaf
Diocese of Llandaff
Mae Ffydd Yn Cyfrif | Faith Matters

Llandaff Diocesan Board of Finance (DBF) Whistleblowing Policy

September 2026

1. Introduction
2. Scope
3. Purpose
4. Responsibility
5. Reporting
6. Investigation
7. Confidentiality
8. Whistleblower protection

1. Introduction

Llandaff DBF seeks to conduct our activities honestly and with integrity at all times. All organisations, however, face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them.

By encouraging a culture of openness and accountability, we hope that we can help prevent such situations occurring. We expect everyone working or undertaking tasks for Llandaff DBF to maintain high standards in accordance with our code of conduct and to report any wrongdoing that falls short of these fundamental principles. It is the responsibility of everyone to raise any concerns that they might have about malpractice.

'Whistleblowing' means the internal or external reporting of suspected misconduct, illegal acts, abuse of people or resources, or failure to take necessary action by anyone at Llandaff DBF. An individual is a whistle-blower if they report certain types of wrongdoing. The wrongdoing they disclose must be in the public interest, so it must

affect others, for example other employees, members of congregation or the public. A whistle blower must reasonably believe that the information disclosed, and any allegation contained in it are substantially true.

The Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998 governs the making of disclosures concerning workplace activities and is intended to protect employees who blow the whistle on bad practice from being subjected to any detriment or unfairly dismissed as a result.

2. What is whistleblowing?

2.1. Whistleblowing protection does not cover reporting of issues such as feedback from management, general workplace interactions, complaints that are not actually misconduct, grievance procedures, etc.

2.2. An individual should use this policy if they have a genuine concern that there are reasonable grounds for believing that any of the following are happening, have happened, or are likely to happen:

- A criminal offence, e.g. fraud;
- The organisation, or someone acting on behalf of the organisation, is breaking the law;
- A miscarriage of justice;
- The health and safety of any individual is endangered;
- Risk or actual damage to the environment;
- Wrongdoing is being covered up;
- Sexual harassment

2.3. We value any concerns reported in good faith under this procedure. If an individual is uncertain whether the matters concerning them are within the scope of this policy (for example, if they are suspicious but uncertain as to whether the law has been broken, or whether a person is acting outside the scope of their authority), the LDBF encourages them to report the concerns in accordance with the procedure set out below.

3. Scope

This policy applies to all staff, both past and present, including employees, workers, office-holders, consultants, contractors, casual workers and agency workers.

4. Responsibilities

4.1. Employees, volunteers and office-holders within the DBF should ensure they read and understand their responsibilities under this policy; namely to come forward as described in the Reporting section below, to raise any concerns. Employees, volunteers and office-holders must also ensure that they do not treat anyone raising a concern unfairly.

4.2. Line managers and team leaders have a specific responsibility to facilitate the operation of this policy and to ensure that employees feel able to raise concerns without fear of reprisals in accordance with the procedure set down below. If a concern is reported to them, they should:

- Discuss the matter with the person reporting;
- Signpost them to the correct policy, if the concern is not in scope for this policy;
- Seek advice from the DBF Board of Trustees if they are unsure whether the concern is in scope for this policy;
- Support the person to report the concern to the DBF Board of Trustees, or report the concern on the person's behalf.

4.3. Llandaff DBF board of trustees has overall responsibility for whistleblowing policy. This includes responsibility for:

- taking action in relation to any concerns reported to them via this policy;
- monitoring and reviewing the operation of the policy;
- making any recommendations for change within the organisation resulting from application of the policy.

5. Reporting

5.1. It is recommended by the Public Interest Disclosure Act 1998 that individuals make their disclosure to their employer (internal disclosure). In the first instance, concerns should be reported to the individual's line manager. If this is not possible, or if the concern involves the individual's line manager, they should report it to the Diocesan Secretary. If the concern involves the Diocesan Secretary, they should report it to the Chair of the DBF or the Bishop's office. If none of these routes are possible, they should contact the HR team at the Representative Body.

5.2. If an individual feels unable to make an internal disclosure, they may also be protected if they report their concerns externally; however stringent conditions must be met for external disclosures. Disclosures to a "responsible third party" or a "prescribed person" are likely to gain protection. However wider disclosures, such as to the police or the media, will only qualify in very limited cases. See GOV.UK for information on prescribed persons.

5.3. Individuals can raise their concerns verbally or in writing in the first instance. They should state that they are reporting a concern under the Whistleblowing Policy, and whether they wish their identity to be kept confidential.

5.4. An individual reporting will be asked to formally outline their concerns in writing. This will be acknowledged, and records kept of all subsequent actions. Then they'll be invited to a meeting to discuss the concerns, which will be attended by the person they reported to and one other named person who will be either a member of Llandaff DBF Board of Trustees or of the HR Department of the Representative Body.

5.5. Individuals may be accompanied by either a colleague or a trade union representative at this meeting. This companion must agree to maintain confidentiality in relation to the concern.

5.6. After this meeting, feedback will be given as to how the matter will be taken forward. If concerns remain, Llandaff DBF Board of Trustees will appoint an Investigation Officer, who will either be a member of that Board, a member of the HR Department of the Representative Body or an external consultant.

6. Investigation

6.1. The length and scope of any investigation will depend on the subject matter of the

disclosure.

6.2. So far as it is appropriate and practicable, individuals who raised concerns will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent the LDBF from giving them specific details of the investigation or actions taken. It is not normally appropriate to set a specific timeframe for completion of investigations in advance, as the diverse nature of disclosures contemplated makes this unworkable. The LDBF will, however, aim to deal with all disclosures in a timely manner and with due regard to the rights of all individuals involved.

6.3. We recognise that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after the investigation. The LDBF will endeavour to inform individuals who raised concerns if a referral to an external authority is about to or has taken place, although it may be necessary to make such a referral without the individual's knowledge or consent if LDBF considers it appropriate.

6.4. We will always endeavour to handle investigations promptly and fairly, but if an individual has made a disclosure under the procedure outlined and they are not satisfied with the investigation or its conclusion, they should write directly to the Chair of the DBF, detailing their concerns.

7. Confidentiality

7.1. Every effort will be made to keep the identity of an individual who makes a disclosure under this policy confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, the individual will also be expected to keep the fact that they have raised a concern, the nature of the concern and the identity of those involved confidential.

7.2. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose the identity of the individual raising the concern. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in the view of the LDBF such circumstances exist, efforts will be made to inform the individual that their identity is likely to be disclosed.

7.3. If it is necessary for the individual raising a concern to participate in an investigation, the fact that they made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect them

from any victimisation or detriment as a result of having made a disclosure. It is likely, however, that the individual's role as the whistleblower could still become apparent to third parties during the course of an investigation.

8. Whistleblower Protection

8.1. No individual who raises genuinely held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action. Detriment includes unwarranted disciplinary action and victimisation. If an individual believes that they are being subjected to a detriment within the workplace as a result of raising concerns under this procedure, they should report this immediately, using the same reporting structure as for concerns. Staff who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

8.2. If an investigation under this procedure concludes that a disclosure has been made maliciously, vexatiously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action. Those choosing to make disclosures without following this procedure or anonymously may not receive the protection outlined above.

END OF POLICY

VERSION HISTORY

Draft prepared: 09 October 2025

HR advisor amendments: 07 May 2026

Approved and adopted by DBF with amendments: 20 July 2026

Amendments made: 28 July 2026

Published: 01 Sep 2026