Whistleblowing Policy

Policy statement
We are committed to the highest standards of honesty, integrity, safety and care. Everyone has a responsibility to speak up about wrongdoing. We will: take concerns seriously and handle them promptly, fairly and confidentially; protect whistleblowers from victimisation or detriment; and learn from concerns to improve our services. This policy supports the Public Interest Disclosure Act 1998 (PIDA) and does not replace normal grievance/complaints procedures for personal employment issues.

What is whistleblowing?
Raising a concern that is in the public interest about suspected or actual wrongdoing, risk or malpractice, for example: criminal offences (e.g., theft, fraud, bribery); Health & Safety dangers (including unsafe mortuary practices, unsafe driving, or infection-control failures); safeguarding risks to children or adults at risk; modern slavery/human rights concerns in our supply chain; environmental damage or unlawful waste handling; data protection/confidentiality breaches (UK GDPR); and cover-ups or deliberate concealment of any of the above. If your concern relates only to your own employment terms or a personal conflict, use the Grievance Policy instead.

Who is protected?
Workers under PIDA include employees, agency workers, trainees, and some contractors. Volunteers and suppliers can also use this policy; we will treat concerns consistently.

Speaking up – how to raise a concern
Choose the route you feel most comfortable with. You can raise concerns openly, confidentially, or anonymously (note: anonymity can limit investigation). First line (preferred): Your Line Manager, or Whistleblowing Officer (WBO). Alternative internal routes: Directors; Safeguarding Lead (for safeguarding matters): Directors; Data Protection Lead (for data/privacy matters): Directors. What to include: what happened, when/where, who's involved, any evidence, any witnesses, and any immediate risks to safety.

External "prescribed persons"
If internal reporting is not appropriate, you may report to a relevant regulator/prescribed person (and still be protected if the disclosure is qualifying and made appropriately), for example: Police (criminal matters); HSE (serious health & safety); ICO (data protection breaches); Local Authority / Coroner (as relevant to funeral operations); CMA (price transparency/consumer protection issues). Nothing in this policy prevents anyone from seeking independent legal advice or, where life/serious harm is at risk, contacting emergency services.

Our response & investigation
We will acknowledge receipt within 2 working days (unless anonymous). Initial triage will occur within 5 working days to assess risk, scope and investigator. Investigations will be proportionate, impartial, and conducted by someone not involved in the concern. We may interview relevant people and review records/CCTV/evidence. We will tell you (where possible) whether the concern is substantiated/partially substantiated/not substantiated, and outline actions taken or planned.

Some details may be limited to respect confidentiality and law. We aim to conclude most investigations within 20 working days; complex cases may take longer and we will keep you updated.

Confidentiality & data protection
We will protect your identity as far as reasonably possible. Your information will be kept secure and processed in line with UK GDPR and our Data Protection Policy. Information is shared strictly on a "need-to-know" basis.

Protection from detriment
You will not be dismissed, disciplined, demoted, denied work, or otherwise treated unfairly because you raised a genuine concern in good faith—even if it turns out to be mistaken. Any victimisation or retaliation against a whistleblower (or anyone assisting an investigation) will result in disciplinary action and may be unlawful under PIDA.

Malicious or vexatious allegations
Deliberately false or malicious allegations are serious misconduct and may lead to disciplinary action. Genuine mistakes are not misconduct.

Immediate risks
If you believe there is an immediate risk to life, safety, or security (e.g., serious infection-control breach, dangerous driving, unlocked mortuary, missing keys or fridge failure), call 999 if required and alert the WBO/On-Call Manager straight away.

Record-keeping & learning
The WBO will keep a secure log of concerns, actions and outcomes. We review trends quarterly (or sooner if needed) and feed learning into training, risk assessments, and procedure updates.

Training & awareness
Induction and annual refresher include how to recognise concerns and raise them safely. Managers receive extra guidance on handling disclosures and preventing detriment.

Interaction with other policies
This policy should be read with: Supplier Code of Conduct; Health & Safety; Safeguarding; Anti-Slavery; Data Protection & Confidentiality; Grievance; Disciplinary; Complaints.

Roles & responsibilities
All workers: raise concerns promptly; cooperate with investigations; keep matters confidential. Managers: listen, support, and escalate appropriately; prevent detriment; cooperate with investigations. Whistleblowing Officer: receive/triage concerns; oversee investigations; protect confidentiality; maintain records; report themes to the Board/Owners. Directors/Owners: ensure resources, independence, and learning from outcomes.

Updates to This Policy

We may update this policy periodically. The latest version will always be available on our website or in our office.