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**PHOENIX RDS**  
**CORPORATE GOVERNANCE & COMPLIANCE POLICIES**



Phoenix-RDS

Policy Summary Sheet

Policy Number	PRDS-MS-POL-005
Policy name	Disclosure / Whistleblowing Policy
Revision	1.0
Date	01/01/22

**This policy sets out what Phoenix RDS intends to achieve in terms of creating an open, transparent and safe working environment where workers feel able to speak up in the event they have concerns about illegal or unethical conduct that doesn't align with our intent of operating the business in an ethical way with honesty and integrity.**

**It indicates the commitments made to enable these intentions to be realised. Managers, staff and contractors are expected to comply with this Policy and identify shortcomings or omissions to their line manager.**

**Phoenix RDS's intent is to operate in accordance with best practice on disclosure/whistleblowing:**

- Recognising workers are valuable ears and eyes for the business.
- Demonstrating, through visible leadership at all levels of the organisation, that we come and encourage workers to make disclosures.
- Resolving wrongdoing quickly.

**We are committed to:**

- Making appropriate resources available to implement this Disclosure / Whistleblowing Policy.
- Ensuring this whistleblowing policy and related procedures are easily accessible to all workers and other stakeholders.
- Providing a range of alternative persons who a whistle blower can approach in the event a worker feels unable to approach their manager.
- Supporting the policy with adequate training, mentoring, advice and support systems.
- Treating all disclosures seriously, consistently, professionally and fairly.
- Taking all reasonable steps to maintain the confidentiality of the whistle blower where it is requested (unless required by law to break that confidentiality).
- Allowing the worker to be accompanied by a colleague, or other suitable representative, at any meeting about the disclosure, if they wish to do so.
- Producing a summary of disclosure meetings for record keeping purposes and providing a copy to the whistle blower.
- Managing the expectations of the whistle blower in terms of what action and/or feedback they can expect as well as clear timescales for providing updates.
- Providing feedback to the worker who raised the disclosure where possible and appropriate, as investigation progresses, subject to other legal requirements. Feedback should include an indication of timings for any actions or next steps.
- Ensuring that it is understood that victimisation of a whistle blower is not acceptable. Instances of victimisation will be taken seriously and managed appropriately.
- Ensuring that clauses in settlement agreements do not prevent workers from making disclosures in the public interest.
- Ensuring that if an investigation concludes that the disclosure was untrue it does not automatically mean that it was raised maliciously by a worker.
- Providing support services after a disclosure has been made such as mediation and dispute resolution, to help rebuild trust and relationships in the workplace.
- Recording the number of whistleblowing disclosures received and their nature.

- Providing information about disclosure/blowing the whistle to the relevant prescribed person(s).
- Ensuring, as a minimum, that Phoenix RDS operations comply with legal requirements, associated codes of practice and guidance.
- Requiring directly employed contractors to comply with this policy. Ensuring other contractors and stakeholders have a comparable policy on disclosure/whistleblowing.
- Applying, survey, monitoring and audit processes to ensure that our approach to disclosure/whistleblowing are effective and our intentions in this area are being achieved.
- Providing signposting to information and advice to those thinking of blowing the whistle, for example:

✓ [Guidance from the Government](#),

✓ [Public Concern at Work](#)

This policy shall be implemented having regard for other relevant Phoenix RDS policies.



Rory Somerset  
Managing Director  
1<sup>st</sup> January 2022