



**EAST THAMES
AGGREGATES
LIMITED**

Speak Up and Whistleblowing Policy

Audience:	All East Thames Aggregates Employees Sub-Contractors Hauliers Supply Chain Partners
Ratified:	Managing Director MARCH 2025
Validated:	Until January 2027
Policy owner:	Managing Director of East Thames Aggregates Ltd
Review frequency:	Yearly – from January 2026

Speak Up and Whistleblowing Policy

Our actions and what we say have a direct influence on all individuals whom we encounter.

- Integrity** We must recognise what we say and do can affect individuals in many ways; with varying impact on those concerned and must be aware of this fact.
- Responsibility** We act judiciously with sensitivity and care. We don't make excuses, but mindfully answer for actions and continually seek to make improvements
- Inclusion** We acknowledge and celebrate that all people are different and can play a role in the long-term future of east Thames Aggregates.
- Enjoyment** Providing a relaxed working environment, providing motivational and full engagement forums for all staff, so that tasks can be tackled and goals achievable.
- Inspiration** Inspirational talk and upbeat attitude to aid positive thoughts and actions that can make the work experience motivational and enhance well-being.
- Learning** Learning new techniques and understanding through training open to all providing a future that is worth pursuing for everyone.
- Leadership** ETA management aspires to supply quality leadership and seek out talent, developing potential and supporting personal growth and feed-back.

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Policy Overview

Why do we have this policy?

Speaking up about any concerns you may have at work is very important. Why?...

Because we want everyone to build and maintain high standards so we can continue to deliver exceptional customer support and end use products.

All organisations face the risk of things going wrong from time to time and a culture of openness and honesty is essential to prevent such situations occurring or to address them when they arise.

We want to:

- Encourage you to report a concern as soon as possible.
- Provide you with guidance on how to raise a concern, and
- Give you assurance that you will be taken seriously,
- Assure you that your confidentiality will be respected.

We will support staff raising concerns and want you to feel free to speak up.

Please don't feel worried about raising a concern. We'd much rather hear from you, than not, so we can do something about it.

How This Relates to National Guidance and Statutory Requirements

There are specific criteria that needs to be in place, so that an individual will be covered by whistleblowing legislation when they raise a concern. These requirements are identified within the Public Interest Disclosure Act 1998. To help you consider whether you might meet these criteria, we would urge you to seek independent advice from free services, such as.

Citizens Advise, ACAS Helpline offers free and impartial advice on 0300 123 1100.

If you decide to blow the whistle to a prescribed person rather than your employer, you must make sure that you have chosen the correct person or body for your issue. Below are some other prescribed persons and bodies who you can make a disclosure.

- Call the Protect Advice Line: 020 3117 2520.
- Contact ACAS Helpline: 0300 123 1100.
- Visit the Protect website: <https://protect-advice.org.uk/>.
- Contact **Speakup Direct**: Through their helpline, email, or online form.
- Contact **WhistleblowersUK**: Through their website.
- NSPCC Whistleblowing Advice Line: 0800 1111.

Policy in Detail

1. Who can raise a concern?

Anyone working for the Trust can raise a concern. This includes employees, close friends and acquaintances. This policy will be available to all and encourage anyone to raise a concern if they have one.

2. What do we want to know about?

We want to know about any concern which may be a risk, a malpractice, or wrongdoing, and about any activity which may be illegal or unethical - especially if you think that it may result in harm. This may include, but is not limited to, one or more of the following:

- An issue of safeguarding.
- A criminal offence.
- Someone failing to comply with a legal or regulatory requirement.
- A health and safety violation.
- A suspicion of fraud, corruption, bribery or blackmail.
- A bullying culture (across a team or school).
- Attempts to hide one, or more, of the above.

Don't wait for proof. We would like you to raise the matter while it is still a concern. It doesn't matter if you turn out to be mistaken. If you have reason to be troubled, we'd rather hear from you.

If you have a concern about an employment matter, which affects only you, it may be better suited to our Grievance Policy. If you feel comfortable speaking to a close colleague and include them on discussions with the management team, please do as we want talk to you about this when you raise your concerns.

3. Feel safe about raising your concern

If you raise a genuine concern under this policy, you will not be at risk of losing your job or any form of reprisal as a result. This may be a difficult or anxious times and we hope you will be reassured that you will be protected and supported by us throughout the process and afterwards.

We are keen to make sure that anyone who raises a concern has appropriate support and is provided with the contact information for an external, independent and confidential support helpline if they want it. If you have a professional individual, you can talk to them before raising a concern, but you don't have to.

'Protect', the independent whistleblowing charity, offers a confidential helpline and advice. Their contact details are given at the end of this policy.

Please be assured that to disclose a genuinely held suspicion that later proves to be wrong is fine. There are no negative consequences for someone who discloses a genuinely held suspicion, whether right or wrong.

Victimisation or intimidation of someone who has raised a concern will not be tolerated in the Trust and will be formally investigated as a potential disciplinary matter.

4. Confidentiality

We hope that you will feel comfortable talking to us, but we also appreciate that you may prefer to raise your concern confidentially. This means that, whilst you are willing for your identity to be known to the person you report your concern to, you don't want anyone else to know your identity. We will keep your identity confidential, if that's what you want, unless we are required to disclose it by law, for example to the police.

You can choose to raise your concern anonymously without giving anyone your name, but a proper investigation may be more difficult if we can't obtain further information. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

5. How to raise a concern

In many circumstances the easiest way to raise a concern will be to speak to your line manager. Depending on the nature of the concern, they may be able to resolve an issue quickly and effectively.

You can raise your concern in person, by phone, in writing or by email. Please be ready to explain as fully as you can the information and circumstances that give rise to your concern.

If you think it isn't appropriate to talk to your line manager, you can talk to anyone whom you feel comfortable with and who will be there to listen.

Please act immediately and write down all information about what is troubling you which will be handy to refer too when you are ready to take the next step.

If, for any reason you don't feel comfortable talking about it to anyone within the company, then again, we urge you to do so at your earliest opportunity.

6. What will we do with your concern?

East Thames Aggregates management team are committed to listening to our staff and to learning lessons on what we can do better. If you raise a concern, please be assured it will be dealt with seriously and sensitively.

The person(s) hearing your concern will acknowledge receipt of your concern within two working days and a meeting, or a telephone call, will be arranged as soon as possible to gather all the information.

If you wish, you can be accompanied by anyone at every stage and meeting, or telephone conversation. The priority at this stage is for us to fully understand the nature of your concern.

The person(s) hearing your concern will make a note of the date your concern was raised, whether you requested confidentiality and a summary of your concerns and provide a copy of this to you. They will provide you with a copy of this policy and with any updates or feedback pertaining to your concern.

Where they are unable to resolve the matter quickly – usually within two working weeks - the matter will be given to the an External Auditing Agent, who will decide on the next steps.

6.1 Investigation

The External Auditor will consider the information provided and determine the next steps depending on the circumstances, the evidence available and the context of the disclosure.

Should the External Auditor determine that a further fact-finding exercise or an investigation is required, then we will carry out a proportionate investigation using someone suitably independent (usually from a different part of the organisation) and properly trained.

Where an anonymous concern is received, the Managing Director or External Auditor will determine whether to investigate based on the seriousness of the issue raised and the likelihood of confirming the allegation with other sources.

We will reach a conclusion within a reasonable time scale and notify you.

Where we can, we will carry out a single investigation. The investigation will be evidence based and will produce a report that focuses on identifying and rectifying any issues and on learning lessons to prevent problems recurring.

Should the External Auditor decide that your concern would be better looked at under another process, for example our policy for dealing with bullying and harassment, or our grievance policy, then we will discuss it with you and provide you with the appropriate support and guidance.

6.2 Other options

Alternatively, the External Auditor may decide that:

- There has been a breach of criminal law, in which case the police will be informed immediately. No further action may be taken so not avoid undermining a police criminal investigation.
- The disclosure is sufficiently serious, or urgent, that they take it immediately to the Managing Director.
- It is inappropriate to share the disclosure with the Managing Director, e.g. if the disclosure concerns, or involves the Managing Director, and may take the disclosure to another senior manager, or to another external agency.
- That the disclosure was potentially malicious and may lead to disciplinary action.

7. Concerns about a third party

The aim of this policy is to provide a process for reporting, investigating and remedying any wrongdoing in the workplace. In most cases it will not be necessary to alert anyone externally.

The law recognises that in some circumstances a concern is so serious that it should be reported to an external body, such as a regulator.

If a concern relates to the actions of a third party, such as a contractor, supplier or service provider, the law allows a concern to be raised with a third party, however, we encourage concerns to be reported internally first.

8. How will we learn from your concern?

The focus for any investigation will be on improving what we do. Any concerns raised to the External Auditor will be reviewed by the Senior Management, and, where improvements are identified, we will ensure they are implemented quickly and monitor them to ensure they are working effectively.

The Senior Management will initiate further investigations if they consider it necessary.

As part of the application of this policy, the Company may collect, process and store personal data in accordance with the General Data Protection Regulations (GDPR), although the identity of anyone who has raised a concern will not be included in any part of the report.

9. Communicating with you

We will treat you with to utmost respect at every stage and will act with due diligence and will thank you for raising your concern. We will discuss your concerns with you to ensure we understand exactly what you are worried about. We will tell you how long we expect an investigation will take and keep you up to date with its progress.

Wherever possible, we will share the outcome of the investigation with you, whilst respecting the confidentiality of others. Sometimes, the need for confidentiality, or compliance with the GDPR, may restrict how much can be shared. For example, it will not be possible to feedback to you about any action applied to other individuals. In all cases, any information about an investigation should be treated as confidential.

Whilst we cannot always guarantee communicating an outcome for you, this policy provides a process to deal with concerns fairly and in an appropriate way. If you are not happy with the way in which a concern has been handled, you may contact the Managing Director or any Senior Manager, and our appointed External Auditor, whom we will provide full details.

Policy Review

We will review the effectiveness of this policy at least annually and make changes as appropriate.

Please use this free impartial advice service at any stage of your application.

E-mail: whistle@protect-advice.org.uk

Website: <https://protect-advice.org.uk>

Raising a Concern.

Appendix 1. Raising a Concern Form.

RAISING A CONCERN			
Name of Person raising concern		Date Received	
Name and position of person receiving the concern		Date Received	
Name and position of the person dealing with the concern		Date received	
Details of the concern:			
Action(s) taken:			
Concern Resolved	Yes/No	Date	
If Yes then.			
Senior Management Informed:	Yes/No	Date	
External Auditor Informed:	Yes/No	Date	
Included on Whistleblowing Log:	Yes/No	Date	
Person Raising Concern Informed:	Yes/No	Date	
If No then.			
Date passed to External Auditor		External Auditor Receipt Date	
Action taken by External Auditor:			
Concern Resolved	Yes/No	Date	
Further Action Required:			
Person raising concern informed:	Yes/No	Date	
Included on Whistleblowing Log:			
Outcome of Report and any Policy Amendments required:			

AUTHORISATION:

Signed:



Mr J A Rogers

(Managing Director)

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