



Whistleblowing Policy (Public Interest Disclosure)

1. Purpose of the Policy

ATA Sameday is committed to maintaining the highest standards of integrity, transparency and accountability in all of its activities. This policy is designed to encourage independent contractors and other third parties to raise genuine concerns about wrongdoing at any level within the business.

The policy applies to all independent contractors, consultants, agency workers, suppliers and any other third parties engaged by the Company.

2. Qualifying disclosures

Qualifying disclosures are disclosures of information where the worker reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future.

- A criminal offence
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Sexual harassment (unwanted conduct of a sexual nature, as defined in the Equality Act 2010)
- Damage to the environment
- Deliberate attempt to conceal any of the above.

3. What this Policy does not cover.

This policy is not intended to cover personal grievances, contractual disputes, or matters relating solely to the individual contractor's terms of engagement.

4. Raising a Concern

Any initial concern should be raised with your line manager. However, if this is not appropriate then you should contact another member of the management team or HR (yourvoice@itbholdings.co.uk) who will ensure that your concern is properly addressed.

Workers who raise a concern which is in the public interest under this policy are entitled not to be subjected to any detriment as a result, however the worker must reasonably believe that the disclosure they are making is true.



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Even if your concern proves to be unfounded you will be protected against any retaliation from your manager, colleagues or any other employee or contractor of the business. Protection is granted by the Public Disclosure Act 1998.

Making a deliberately false allegation, however, against the Company, a fellow worker or any other person will be treated as a breach of your SLA and may result in termination of the agreement.