

M I L B A N K G R O U P

Sexual Harassment

A Guide for Managers

Version 1 | July 2026 | Internal

Why this guide exists

If a colleague comes to you with a report of sexual harassment, how you respond in the first few minutes matters. This guide tells you what to do, what to say, and where to go for help.

Read it alongside the Sexual Harassment Policy. If you are ever unsure, contact the People Team - do not try to manage this alone.

Our position

Sexual harassment is never acceptable - from a colleague, a manager, a customer, or anyone else encountered through work. We have a zero-tolerance approach and a legal duty to prevent it.

Since October 2024, employers have been required to take reasonable steps to prevent sexual harassment. The law is strengthening further. We take this seriously.

What sexual harassment is – a reminder

Sexual harassment is unwanted conduct of a sexual nature that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It can be:

Physical

- Unwanted touching, grabbing, patting, pinching, hugging, kissing or groping
- Blocking someone's path or standing too close

Verbal

- Sexual comments, jokes, innuendo or 'banter'
- Intrusive questions about someone's private or sex life
- Sexual propositions or pressure for sexual favours
- Describing someone's appearance in a sexual manner
- Using terms such as 'babe' or 'stud' without consent

Non-verbal / digital

- Staring, leering or making sexual gestures
- Displaying or sharing sexual images, content or material
- Sending sexually explicit emails, texts or messages via WhatsApp or social media
- Spreading sexual rumours about a colleague
- Sharing someone's intimate images without consent

'Banter' is not a defence. It does not matter whether the person intended it as harassment. What matters is how it made the recipient feel. A single incident is enough.

Sexual harassment can happen anywhere work-related: on site, at a client's premises, at a work event, social gathering, or online. It can be carried out by a colleague, a manager, a contractor, a customer, or any third party.

When a colleague comes to you

Find a private space straight away. Then:

- Listen without interrupting. Let them tell you what happened in their own words.
- Acknowledge what they have shared: "Thank you for telling me. I take this seriously."
- Reassure them they will not be penalised for raising it.
- Tell them you are going to contact the People Team so it is handled properly.

- Do not speak to the person being reported before the People Team has advised you to.
- Write down what you were told as soon as possible after the conversation - date, time, what was said. This is for the People Team, not for circulation.

What to say – and what not to say

✓ Say this	✗ Never say this
<i>Thank you for telling me. I take this seriously.</i>	<i>Are you sure? That doesn't sound like them.</i>
<i>You will not be penalised for raising this.</i>	<i>Can we keep this between us for now?</i>
<i>I'm going to contact the People Team today.</i>	<i>Leave it with me - I'll have a quiet word with them.</i>
<i>Is there anything you need right now?</i>	<i>Why didn't you say something at the time?</i>

If you witness it

If you see or hear something that crosses the line, act.

- Challenge it in the moment if it is safe to do so. A clear "Stop - that's not OK" carries weight.
- Check in with the person affected and ask if they are alright.
- Report it to the People Team even if the colleague does not want to take it further. You have a responsibility to flag it.

Customers, contractors and visitors

Sexual harassment from someone outside Milbank is treated just as seriously as from a colleague. Do not ask a colleague to put up with it because the person is a customer or client.

Report it to the People Team. We will decide the appropriate next step - up to and including ending a business relationship. No commercial consideration comes before a colleague's safety.

Things not to do

- Do not mediate between the two people yourself.
- Do not speak to the accused before the People Team advises you to.
- Do not share details of the report with other colleagues.
- Do not discourage the colleague from making a formal complaint.
- Do not treat the reporting colleague differently or with suspicion - that is victimisation and it is unlawful.

If the report involves another manager or a senior colleague

If the person being reported is a manager, a senior figure, or someone with authority over the reporting colleague, this needs particular care.

- Do not refer the colleague back to the person being reported.
- Escalate directly to a more senior manager or the People Team immediately.
- Protect the reporting colleague from any further contact with the alleged perpetrator where you can.
- Be alert to any signs of pressure on the colleague to drop or change their account.

Power imbalances are an aggravating factor. They are taken into account in any disciplinary outcome.

If the accused person is in your team

You may find yourself managing someone who has been accused of sexual harassment. This requires careful balance.

- Do not discuss the allegation with the accused before the People Team has advised you to.
- Do not share details of the complaint or the complainant's identity with the accused prematurely.
- If suspension is recommended by the People Team, treat it as a neutral act – not a punishment. Communicate it in those terms.
- Continue to manage them professionally and do not treat them as guilty before any investigation concludes.
- The investigation will be conducted fairly. Your role is to support the process, not run it.

Quick reference

When a colleague reports sexual harassment:

1. Find a private space. Listen.
2. Acknowledge and reassure.
3. Contact the People Team the same day.
4. Do not speak to the accused before the People Team advises.
5. Write up what you were told. Keep it confidential.
6. Check in with the colleague regularly while the process is ongoing.

People Team: peopleteam@milbank.co.uk

This guide does not form part of any employee's contract of employment and may be amended from time to time. Read alongside the Milbank Group Sexual Harassment Policy.

Policies referenced: Sexual Harassment Policy / Third-Party Sexual Harassment Policy / Dignity at Work Policy / Grievance and Dispute Policy / Disciplinary Policy / Whistleblowing Policy