

Dignity at Work Policy

Our approach

Everyone at the Milbank Group has the right to be treated with dignity and respect. Nobody should have to put up with bullying, intimidation or behaviour that makes them feel uncomfortable, humiliated or afraid.

Harassment and bullying have no place at the Milbank Group. We are committed to providing a working environment where unacceptable behaviour is challenged and dealt with – whoever it comes from.

This policy applies to all colleagues, managers, directors, contractors and visitors. It should be read alongside our EDI Policy, our Sexual Harassment Policy, and our Third-Party Sexual Harassment Policy.

What this policy covers

Everyone at the Milbank Group has the right to be treated with dignity and respect. Nobody should have to put up with bullying, intimidation or behaviour that makes them feel uncomfortable, humiliated or afraid.

This policy covers behaviour that takes place in any of the following circumstances:

- At work or on Company premises
- At any work-related event or activity – including social events, team nights out, and any gathering you attend because of your job, whether or not it takes place on Company premises
- Outside of work where the behaviour is directed at a colleague or someone connected to Milbank – including on personal social media accounts
- Outside of work where the behaviour is relevant to your suitability to carry out your role

The fact that something happens outside working hours or away from the workplace does not put it outside the scope of this policy. Conduct on personal social media, at events attended in a work capacity, or in any other context with a clear connection to your employment falls within these standards.

What we mean by bullying

Bullying is repeated behaviour that is offensive, intimidating, humiliating or threatening. It can be physical, verbal or psychological. It does not need to be related to a protected characteristic.

Examples include:

- Shouting at someone or behaving aggressively

- Persistently criticising someone's work without justification or setting unreasonable double standards
- Deliberately excluding someone from conversations, meetings or social events
- Spreading rumours or gossip
- Setting someone up to fail by giving impossible deadlines or withholding information they need
- Using position or authority to intimidate
- Behaviour designed to produce anxiety or belittle a colleague
- Unreasonable denial of leave, flexible working requests or development opportunities as a means of control

This list is not exhaustive. A single incident can also amount to bullying if it is sufficiently serious.

What we mean by harassment

Harassment is unwanted behaviour related to a protected characteristic that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It can be a single incident or a pattern of behaviour.

Protected characteristics under the Equality Act 2010 include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Examples include:

- Offensive jokes, comments or 'banter' related to someone's race, sex, disability, religion, sexual orientation, age or other protected characteristic
- Unwelcome physical contact
- Displaying or sharing offensive material, including online or via social media
- Mocking someone's accent, appearance, beliefs or background
- Deliberate misgendering or deadnaming
- Insensitive mimicry or impersonation
- Name-calling or abusive language

It does not matter whether the behaviour was intended as harassment. What matters is the effect it had on the person receiving it.

Harassment can also be based on association – for example, making fun of someone because of a disabled relative, or making assumptions about someone's sexuality. It does not require the person to have the protected characteristic themselves.

What we mean by victimisation

Victimisation means treating someone unfavourably because they have raised a concern, made a complaint, given evidence in connection with a complaint, or supported someone else who has. It is unlawful and will not be tolerated.

Examples include failing to consider someone for promotion because they previously made a complaint, or excluding someone from meetings because they acted as a witness in a grievance.

You will not be penalised for raising a concern in good faith – even if the concern is not upheld.

Your responsibilities

Every colleague is expected to:

- Treat others with dignity and respect at all times
- Challenge behaviour that falls below these standards, where it is safe to do so
- Report concerns – whether you are the person affected or a bystander
- Cooperate fully and confidentially with any investigation

Managers have an additional responsibility to set the tone in their teams, challenge unacceptable behaviour promptly, and be alert to situations where someone may be at risk. Abuse of seniority or power over a more junior colleague will be treated as an aggravating factor.

What to do if it happens to you

If you feel comfortable doing so, tell the person that their behaviour is unwelcome and ask them to stop. Sometimes people do not realise the effect of their behaviour, and a direct conversation can resolve things.

If you do not feel comfortable doing that, or if the behaviour continues, you have several options:

- Speak to your manager (or a different manager if your manager is involved)
- Contact the People Team directly at peopleteam@milbank.co.uk
- Raise a formal grievance under the Grievance and Dispute policy
- Use the Whistleblowing policy if you prefer to raise it confidentially at confidential@milbank.co.uk

If you would like to make a formal written complaint, keep a note of what happened: who was involved, what was said or done, when and where it occurred, and the names of any witnesses. This will help us investigate effectively.

You do not have to go through your manager. You can come directly to the People Team at any time.

If you witness it

If you see bullying or harassment happening, you have a responsibility to act. You do not have to put yourself at risk, but you can:

- Intervene in the moment if it is safe to do so
- Check in with the person affected and offer support
- Report what you witnessed to your manager or the People Team

We would always rather know. A report from a bystander can be just as important as a report from the person directly affected.

Third-party harassment

Harassment from someone outside Milbank – a customer, supplier, contractor or visitor – is taken just as seriously as harassment from a colleague. You should not be expected to tolerate it.

If you experience harassment from a third party, report it to your manager or the People Team as soon as you can. We will take appropriate action, which may include raising a complaint with the third party's employer, restricting their access to our premises, or ending a business relationship.

For sexual harassment from third parties, please also refer to our Third-Party Sexual Harassment Policy.

What we will do when a concern is raised

We take every report seriously. We will:

- Acknowledge your report promptly
- Keep the matter confidential – sharing information only with those who need it to manage the process
- Investigate thoroughly and fairly
- Keep you updated on progress and outcome
- Consider whether the individuals involved need to be separated during the investigation

If bullying or harassment is found to have occurred, it will be dealt with under our Disciplinary Policy. Outcomes depend on the severity and may include formal warnings or dismissal. Abuse of power over a junior colleague will be treated as an aggravating factor when deciding the appropriate outcome.

No retaliation

You will not be treated unfairly for raising a concern, giving evidence, or supporting someone else who has raised a concern – provided you are acting in good faith.

If a complaint is found to have been raised maliciously or dishonestly, this may itself be treated as a disciplinary matter.

Questions

If you are unsure whether something counts as bullying or harassment, or if you want to talk through your options before deciding what to do, please get in touch. We would always rather you raised it and let us help you work out the next step.

Contact the People Team at peopleteam@milbank.co.uk or speak to any manager you trust.

milbankgroup.co.uk

Version	Date	Author	Changes
V1		Milbank Group	Creation
V2	30/04/2026	Milbank Group	Approved