

Sexual Harassment Policy

Our approach

Sexual harassment is unacceptable. We have a zero-tolerance approach to it - whether it comes from a colleague, a manager, a client, a contractor, or anyone else you encounter through work.

The law requires employers to take proactive steps to prevent sexual harassment, and those requirements are strengthening. We do not treat this as a compliance exercise. We take all reasonable steps to prevent sexual harassment – including from third parties – and we review our approach, training and culture regularly to make sure we are doing enough.

What this policy covers

This policy applies to all colleagues, contractors, agency workers and volunteers across all areas of the Milbank Group.

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

- During your working hours in the course of your work, including remote or home working
- At any work-related event or activity outside normal working hours – including team socials, client events, business trips, or any other gathering you attend because of your job
- Outside of work where the behaviour is directed at a colleague or someone connected to Milbank – including via personal social media, messaging apps, or other digital means
- Outside of work where the behaviour is relevant to your suitability to carry out your role

Sexual harassment does not need to happen in person or on Company premises to fall within this policy. Messages, images or comments shared via WhatsApp, social media, email or any other digital channel are covered.

What sexual harassment is

Sexual harassment is unwanted behaviour of a sexual nature that violates your dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It can be physical, verbal, or non-verbal.

Examples include:

- Unwelcome sexual comments, jokes or innuendo
- Unwanted physical contact - touching, brushing against someone, grabbing

- Displaying or sharing sexual images or content (including via phone, email or social media)
- Staring, leering, or making sexual gestures
- Sexual propositions or pressure for sexual favours
- Comments about someone's body, clothing or appearance that are sexual in nature
- Sharing someone's intimate images without their consent

A single incident can amount to sexual harassment. It does not have to be repeated.

It does not matter whether the person intended it as harassment. What matters is how it made you feel.

Someone may also be affected by sexual harassment even if they were not the direct target – for example, witnessing behaviour directed at a colleague.

Victimisation

Victimisation means treating someone unfavourably because they have raised a concern, made a complaint, supported someone else's complaint, or given evidence in connection with a complaint under the Equality Act 2010.

Examples include:

- Failing to consider someone for promotion because they previously made a sexual harassment complaint
- Dismissing or excluding someone because they gave evidence as a witness
- Creating a hostile working environment for someone who supported a colleague's complaint

Victimisation is unlawful and will not be tolerated. You will not be penalised for acting in good faith – even if a complaint is not upheld.

If it happens to you

We want you to feel safe to report it. You can:

- Tell the person to stop, if you feel safe doing so
- Speak to your manager, or a different manager if your manager is involved
- Contact the People Team directly and in confidence peopleteam@milbank.co.uk
- Email our confidential inbox at confidential@milbank.co.uk
- Raise a formal grievance
- Use the Whistleblowing policy

You will be believed, you will be supported, and you will not be penalised for reporting it.

If you want to make a formal complaint, it helps to 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. Your People Team contact can help you with this.

If you witness it

If you witness sexual harassment, please act. You do not have to put yourself at risk, but you can:

- Intervene in the moment if it is safe to do so
- Offer support to the person affected and encourage them to report it
- Report what you have witnessed yourself – to your manager, the People Team, or via confidential@milbank.co.uk

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

What we will do

We will investigate every report promptly, sensitively and confidentially. On receipt of a formal complaint we will:

- Acknowledge the report and make contact within five working days
- Keep the matter confidential – sharing information only with those who need it to manage the process
- Consider whether to separate the individuals involved while the investigation takes place
- Carry out a thorough and fair investigation, normally concluding within ten working days of the initial meeting
- Confirm the outcome in writing, with the right to appeal

Appealing an outcome

You have the right to appeal any outcome in writing within seven days of receiving the outcome letter. Your appeal will be heard by a more senior manager who was not involved in the original decision. The appeal outcome will be confirmed in writing and is final.

No retaliation

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

Regardless of the outcome of any process, we are committed to providing the support you need. This may include mediation or other measures to manage the ongoing working relationship where appropriate.

Questions

If you have experienced sexual harassment, or you are unsure whether something you have experienced counts, please get in touch. You do not have to deal with this alone.

Contact the People Team at peopleteam@milbank.co.uk, or use our confidential inbox at confidential@milbank.co.uk.

milbankgroup.co.uk

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