

# Whistleblowing Policy

## Our approach

If you see something wrong, we want you to feel safe to speak up. Whistleblowing - raising a concern about wrongdoing - is protected by law, and we take it seriously.

This policy is about raising concerns where you believe something is happening that is illegal, dangerous, damaging, or being covered up. It is not for personal grievances - those should go through the Grievance procedure.

## What counts as a qualifying disclosure

You are protected by law if you reasonably believe that a disclosure shows, or tends to show, one or more of the following:

- A criminal offence has been committed, is being committed, or is likely to be committed
- A legal obligation is being or is likely to be breached
- A miscarriage of justice has occurred or is likely to occur
- The health or safety of any person is being or is likely to be endangered
- The environment is being or is likely to be damaged
- Sexual harassment - reporting sexual harassment, whether it affects you or a colleague
- Information about any of the above is being or is likely to be deliberately concealed

You do not need to prove the wrongdoing. You just need to have a reasonable belief that it is happening.

## How to raise a concern

In the first instance, speak to your manager. If that is not appropriate - for example, if your manager is involved - you can:

- Contact the People Team at [peopleteam@milbank.co.uk](mailto:peopleteam@milbank.co.uk)
- Speak to a director or senior manager
- Raise it through any other confidential channel we make available – [confidential@milbank.co.uk](mailto:confidential@milbank.co.uk)

If you have exhausted internal routes and still believe your concern has not been addressed, you may raise it externally with the relevant prescribed body (for example, the Health and Safety Executive, the Environment Agency, or HMRC).

## What happens next

We will acknowledge your concern and explain how we intend to handle it. We will investigate promptly and, where appropriate, tell you the outcome - although we may not be able to share every detail if it involves other people's confidentiality.

## Protection

If you raise a concern in good faith, you are legally protected from dismissal and any form of detriment.

We will not tolerate retaliation against anyone who raises a genuine whistleblowing concern.

Making a disclosure that you know to be false is a serious matter and may be dealt with under the disciplinary procedure.

## Questions

If you are unsure whether something qualifies as whistleblowing, or if you want to talk it through before making a formal disclosure, contact [peopleteam@milbank.co.uk](mailto:peopleteam@milbank.co.uk) in confidence or seek independent advice from Protect at [protect-advice.org.uk](https://protect-advice.org.uk).

[milbankgroup.co.uk](https://milbankgroup.co.uk)

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