



## Bullying, Harassment and Discrimination Policy For Parishes and Deaneries

Produced by the Diocesan Referrals Group

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### Introduction

The Diocese of Southwark will not tolerate abuse, harassment and bullying, discrimination, or victimisation – however rare. All complaints of abuse, harassment, bullying, discrimination, or victimisation will be taken seriously and thoroughly investigated.

1. This Policy addresses issues of bullying, harassment and discrimination at every level within the Diocese. This extends to clergy, lay ministers, officers of the PCC, trustees, diocesan employees, and volunteers, and sets the expectation of those who attend and interact with the Church and our diocese. It seeks to extend the previously adopted Dignity at Work Policy, and make specific reference to the [Diocesan Complaints Procedure](#). It should be noted that the General Synod have requested the Archbishops' Council to explore a [Code of Conduct for Parochial Church Council \(PCC\)](#) members and lay volunteers and this will be included and adhered to in due course.
2. Formal processes and rules differ for various roles within the Church, for example clear guidelines are set out in the Clergy Terms of Service for ordained ministers and in staff handbooks for diocesan staff.
3. As a diocese, our trustees, members of Synod and volunteers are asked to adhere to our Southwark Diocesan Values, adapted from the 7 Nolan Principles of Public Life. These can be found at Appendix A.
4. The aim of this Policy is to ensure that every person:
  - is treated with dignity and respect
  - is able to perform their roles and flourish in an environment free from harassment on the grounds of age, gender, sexual orientation, race, religion or belief, political opinion, marital status, disability, or nationality
  - is aware that bullying and harassment are not acceptable and will not be tolerated
  - understands how to raise concerns about bullying and harassment

### What is bullying and harassment and how can it be identified?

5. Bullying is behaviour which humiliates or demeans the individual involved and includes persistent criticism and personal abuse, either in public or private. If it is not challenged, it can escalate and lead to significant difficulties for all concerned. In establishing the links between 'unacceptable behaviour', 'bullying', and 'harassment', as well as drawing together the common themes and issues, the following broader definition may be helpful:

"Any behaviour, always involving a misuse of power, which an individual or group knows, or ought reasonably to know, could have the potential effect of offending, humiliating,

intimidating or isolating an individual or group should be regarded as unacceptable... 'Unacceptable behaviour' changes its label to 'bullying' or 'harassing behaviour' when it causes actual harm or distress to the target(s), normally but not exclusively, after a series of incidents over a prolonged period of time. Lack of intent does not diminish, excuse, or negate the impact on the target, or the distress caused. The degree of intent is only relevant in terms of how the behaviour should be challenged and the issues subsequently resolved." Fergus Roseburgh, Senior Staff Representative, Unite the Union.

The Childrens' Society (March 2007)

6. **Bullying** is most easily identified when it is continuous, frequent, repetitive and part of an overall pattern. However, some abuse is serious enough to be recognised even if the behaviour occurred only once and is therefore not defined as bullying.
7. **Harassment** is unwanted conduct related to a protected characteristic under the Equality Act<sup>1</sup> that violates people's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This includes third party harassment where an employer is potentially liable for harassment of employees by third parties who are not employees, where the employer fails to take reasonable steps to prevent it. Harassment is from the perspective of the recipient of the treatment and may vary between persons.
8. This may take place in churches, offices, church halls, and houses used for church meetings. It may be related to age, sex, race, disability, religious belief (including theology or church tradition), nationality or any personal characteristic of the individual, and may be persistent or an isolated incident. The important point is that the actions or comments are viewed as demeaning and unacceptable to the recipient. A list of examples of bullying and harassing behaviour is provided at Appendix B.
9. **Discrimination** may take a number of forms:
  - **Direct discrimination** - treating people less favourably than others because of an applicable protected characteristic
  - **Indirect discrimination** - applying a provision, criterion or practice which disadvantages or would disadvantage people who share an applicable protected characteristic (and disadvantages the individual complainant), and which is not justified as a proportionate means of achieving a legitimate aim
  - **Associative discrimination** – direct discrimination against someone because they associate with another person who possesses an applicable protected characteristic
  - **Perceptive discrimination** – discrimination against an individual because they are mistakenly perceived to possess an applicable protected characteristic
  - **Victimisation** – subjecting someone to a detriment because they have done (or the perpetrator believes they have done or may do) a "protected act", e.g. made a formal complaint of discrimination or given evidence in a tribunal case

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<sup>1</sup> age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, gender, sexual orientation, or religion or belief, including church tradition

## Dealing with allegations of harassment, bullying or discrimination

- If someone is at risk of immediate harm contact the police on 999. Clergypersons should also contact their archdeacon as a matter of urgency
- For safeguarding concerns, follow diocesan policies and contact the [Safeguarding Team](#).
- For urgent safeguarding advice, outside of office working hours contact your local social services, provided by local authorities. Out of hours contacts can be found on the diocesan website.
- Please also see our Diocesan Racial Incidents procedure.

**If you are experiencing bullying or harassment, you should not suffer in silence or feel that you are to blame in some way for inviting bullying behaviour.**

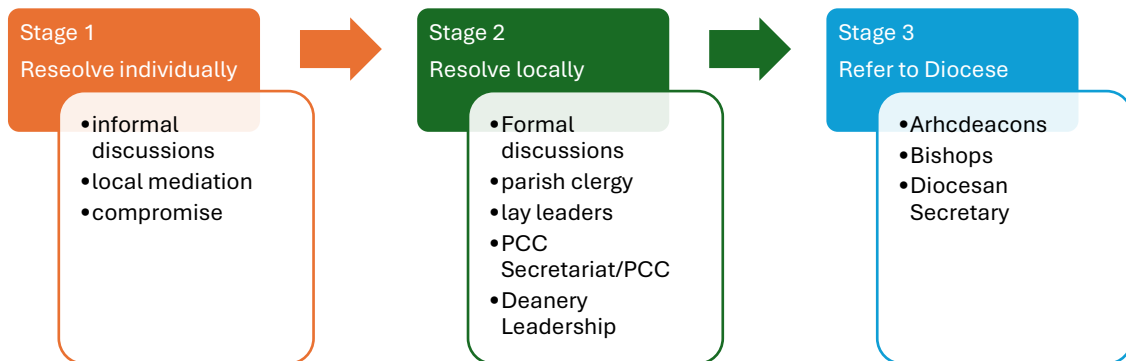
### 10. Actions you can take yourself:

- There are a series of actions that can be taken including actions to take yourself. Keep a factual log of all incidents – dates, times, nature of incident, details of accusations, criticisms, emails and other correspondence. This may be needed as evidence should harassment, victimisation or bullying continue or subsequently recur.
- Try to get witnesses to bullying incidents and avoid situations where you are alone with the bully. Find out if you are the only person being bullied or whether other people are also affected now, or have been in the past. Talk to colleagues and see if they will support you.
- Consider what support and advice is available including from qualified counsellors, professional associations, trades unions and the police. The Archdeacon will be able to advise you on the names of independent people who are well versed in supporting those who have been the object of bullying or harassment.

### 11. The Diocese has an approved complaints procedure for use within a parish or deanery within the Diocese. The Procedure sets out the various ways in which the Diocese seeks to resolve complaints and can be found at Appendix C and [online](#). Procedures range from informal resolutions through to formal intervention, and where appropriate legal and/or police involvement.

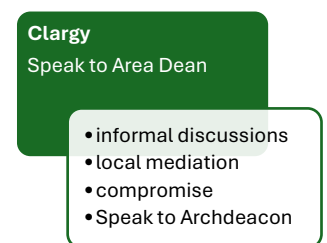
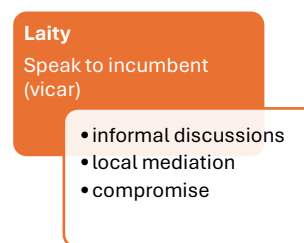
### 12. The Diocesan Referrals Group was established in 2023 to support our archdeacons and bishops in areas which are not necessarily safeguarding (as per House of Bishops' guidance) to seek insights, discussion and direction, and support. These situations may include allegations of bullying, harassment, pastoral breakdown, and the rebuilding of relationships. The Diocese has a comprehensive set of policies around conduct for its employees and for trustees, as in both instances there is a framework of secular regulation and law to undergird informal and formal good practice. Most situations can be managed internally and informally. There are no such frameworks for parishioners, and there are limited frameworks for volunteers, clergy and others holding the Bishop's Licence. But, wherever possible complaints will be resolved amicably, professionally and with pastoral care and sensitivity. Individuals making complaints will be dealt with courteously and professionally. Information will be clarified, and any further information sought.

13. Where possible the Diocese will try to mediate and intervene informally. There may be times when further consideration including legal action, police involvement is required. These will be considered on a case-by-case basis.



### Informal procedures

14. If a lay person considers that they are the target of bullying or harassment they should speak to their Incumbent in the first instance. If a clergy person considers that they are a target of bullying or harassment, they should speak to their Area Dean in the first instance or to their archdeacon if appropriate. If the person indicated as a point of contact is the alleged perpetrator, then the Archdeacon should be contacted in cases of clergy and the Area Dean in cases of lay complainants.
15. It is helpful to aim to speak to this person as soon as possible after the incident concerned. It is, however, recognised that complaints of this nature may relate to cumulative actions taking place over a period of time.
16. It is the duty of the appropriate person to investigate the allegations and, if there is sufficient evidence to justify a complaint, to speak to the person alleged perpetrator. It is the appropriate person's responsibility to take speedy action to stop harassment and it is important that it is made clear to the perpetrator that such behaviour is unacceptable and will not be tolerated. Silence or inaction can be seen as collusion and endorsement of such behaviour.
17. Those investigating claims of harassment should consider all the circumstances before reaching a conclusion, and particularly the perception of the complainant, as harassment is often felt differently by different people. Having gathered all the evidence those investigating should ask themselves "could what has taken place be reasonably considered to have caused offence?" In some cases, it may be possible to rectify matters informally.
18. Sometimes people are not aware that their behaviour is unwelcome and an informal discussion can lead to greater understanding and an agreement that the behaviour will cease. It may be that the individual will choose to do this themselves, or they may need support.



19. If someone complaining about bullying or harassment considers the process followed to have been inadequate, they should next approach the Archdeacon. It is anticipated that those involved in the process will each seek to ensure that it is surrounded by prayer at every stage.

**Formal Procedures.**

20. If an informal approach does not achieve satisfactory results, or the nature of the incident(s) prompts the person who feels harassed to take a more formal approach, a formal complaint should be made by following the Complaints Procedure.
21. Persons affected by such behaviour may complain informally or formally as follows:
- Diocesan staff to their Line Manager or to the Deputy Diocesan Secretary, or to the Diocesan Secretary
  - Parish Employees to their Parish Priest or Archdeacon
  - Parish Priest to their Archdeacon, Area Dean or the Chaplain to the Bishop of Southwark
  - Lay ministers, PCC Officers to their Parish priest, Archdeacon, Warden of Readers, or Diocesan Commissioned Pastoral Lay Minister as appropriate.
22. Every effort will be made to resolve complaints informally. However, the action which will be taken in relation to complaints of bullying or harassment will also be guided by Diocesan Policies, relevant regulations and relevant legal frameworks.
23. It may be appropriate to complete a Serious Incident Report to the Charity Commission.
24. In exceptional cases the advice of external Legal Advisors to the Diocese will be sought.

## Southwark Diocesan Values

- 1** Christian values: seek to model and espouse Christlikeness and service. They will be people of prayer. They will be committed to supporting approved diocesan strategy for the furtherance of the mission of the Diocese of Southwark;
- 2** Selflessness: should act solely in terms of the interests of the Church as the Body of or other benefits for themselves, their family or their friends. They should take seriously their role as representatives, bringing parish views to meetings and reporting back to their electorate;
- 3** Integrity: should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties;
- 4** Objectivity: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit
- 5** Accountability: Trustees are accountable for their decisions and actions and must submit themselves to whatever scrutiny is appropriate to their office;
- 6** Openness: Trustees should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it;
- 7** Honesty: Trustees have a duty to declare any private interests relating to their charitable, synodical or company duties and to take steps to resolve any conflicts arising in a way that protects the interest of the Diocese of Southwark, the wider Church and society;
- 8** Leadership: Holders of public office should promote and support these principles by leadership and example. The continued living out of these principles will embed them in our culture. It is therefore essential that when we adopt new structures, we also commit ourselves to renewed behaviour

### Examples of bullying behaviour

Bullying or intimidating behaviour may take many forms, it may take place in person or in groups, in private or in a more public arena, be verbal, written, including via social media, or by actions in other forms. This list of behaviours is not exhaustive but gives a clear indication of the sorts of actions that constitute bullying or harassment:

- removing areas of responsibility without discussion or notice
- isolating someone or deliberately ignoring or excluding them from activities
- consistently attacking someone's professional or personal standing
- setting out to make someone appear incompetent
- persistently picking on someone in front of others
- deliberate sabotage of work or actions
- deliberately withholding information or providing incorrect information
- overloading with work/reducing deadlines without paying attention to any protest
- displays of offensive material
- use of e-mails to reprimand, insult or otherwise inform someone of their apparent
- failing, either to the individual or to third parties
- repeatedly shouting or swearing
- spreading malicious rumours to third parties
- public humiliation by constant innuendo, belittling and 'putting down'
- personal insults and name-calling
- aggressive gestures, verbal threats and intimidation
- persistent threats about security
- making false accusations
- aggressive bodily posture or physical contact
- talking/shouting directly into someone's face
- direct physical intimidation, violence or assault
- misuse of social media as a platform for the above
- [stalking](#)
- over-frequent correspondence

The most serious incidents might result in:

- creating an unsafe working environment
- ignoring signs of overwork and extreme stress
- putting someone's health physically, emotionally or psychologically at risk by making them upset, frightened and/or ridiculed.



## Diocesan Complaints Procedure

Produced by the Diocesan Referrals Group

### Introduction

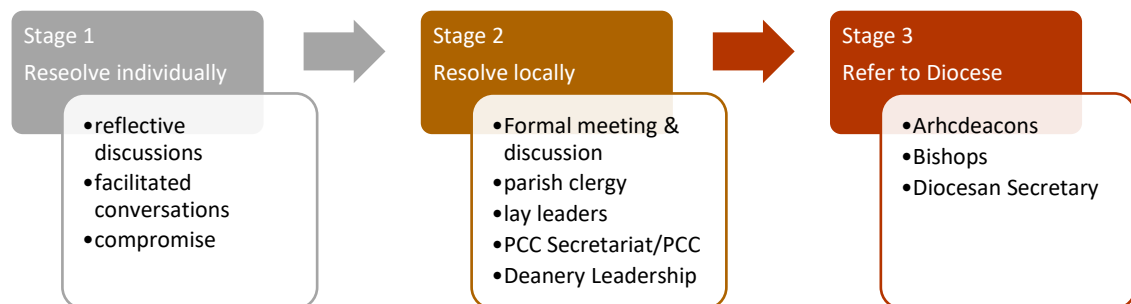
1. This Policy sets out the various ways in which the Diocese of Southwark seeks to resolve complaints.
2. For the purpose of this procedure, a "complaint" is a written or verbal expression of dissatisfaction or disquiet about the policies and procedures, acts or omissions of a parish or Deanery within the Diocese, or any of their officers. A complaint may include an allegation that a person has behaved in an unacceptable way.
3. There are separate procedures dealing with other types of complaints:
  - **Safeguarding:** If you wish to raise a concern relating to safeguarding, please contact the Diocesan Safeguarding Team. The contact details are available at <https://southwark.anglican.org/safeguarding/>. If you suspect a person is at risk of immediate harm, phone 999.
  - **Safeguarding complaints:** If you wish to complain about the Diocese's safeguarding functions, there is a separate policy for which can be found [here](#). Local parochial concerns, in the first instance, should follow the procedure outlined in A Safe Church (form 21) which can be found at Appendix A.
  - **Other diocesan services:** If you wish to complaint about other services provided centrally by the Diocese of Southwark, or about the actions of a diocesan employee, officer, or board or committee member, please contact the Diocesan Secretary ([diocesan.secretary@southwark.anglican.org](mailto:diocesan.secretary@southwark.anglican.org)) or the relevant departmental manager. Diocesan staff should follow the grievance procedure set out in the staff handbook.
  - **Clergy misconduct:** If you wish to make a formal disciplinary complaint about serious misconduct by a member of the clergy, you will need to follow the Clergy Discipline Measure 2003 process detailed here: <https://www.churchofengland.org/about/leadership-and-governance/legal-resources/clergy-discipline>. If appropriate, you may wish to refer to this procedure as a means of seeking to resolve the complaint informally first.
  - **Diocesan Property:** There is a separate complaints policy for property services for anyone living in diocesan-managed housing.
4. This Policy covers other situations in parishes or deaneries which are primarily concerned with relationships and in a church or parish setting, rather than services provided. They may include areas such as breakdown in pastoral relationship in a church setting, bullying and harassment which are defined in the Diocesan Dignity at Work Policy<sup>1</sup> (see Appendix B).
5. This procedure is not a replacement for referral to the Police or other authorities and agencies where that is the appropriate course of action.

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<sup>1</sup> As approved by Diocesan Synod in the Handbook of Governance

## Principles of Resolution

6. Where possible individuals should seek to resolve any conflicts locally, informally and individually. Concerns and complaints should, therefore, be first brought direct to the person(s) deemed responsible where possible or appropriate.
7. In the event that this does not resolve the situation, it is recommended that local intervention be sought prior to submitting a Formal Complaint using this Policy. If the complaint is not satisfactorily resolved at the local level, or informally, then please use this formal procedure described below at Stage 3. The Diocese is committed to dealing effectively with any concerns or complaints raised. Where possible, we will seek to mediate and enable concerns to be resolved informally, speedily and fairly by discussion, problem-solving, and negotiation.



## Formal Complaints

8. In the event that informal discussions have not proved effective you may consider making a Formal Complaint. The overriding principles are that all complaints will be:
  - Normally in writing. If telephone complaints are raised, you will be invited to put these in writing so that clear information is received/agreed with the complainant. Anonymous complaints cannot normally be followed up.
  - Responded to promptly and in compliance with Data Protection Regulations (GDPR)
  - Investigated fairly and with pastoral care and sensitivity.
  - Resolved as amicably as is possible in any situation with complainants asked where appropriate about how they would like their complaint resolved; but understanding how the decision-making processes work.
  - Reviewed, where appropriate, by the Diocesan Referrals Group which meets monthly.
  - Complaints can be made about issues of policy, action, or individual service/action by a member of clergy, lay workers, Staff or parishioner.
  - Complaints cannot be made about decisions or actions that have been taken following legal church processes, protocols, due process, and appeal processes.
  - The Diocese will not accept vexatious, threatening or intimidating complaints made about any individual. These may be referred to the statutory authorities as appropriate.
  - If a referral is made to the Diocesan Referrals Group, it could be six weeks before a response can be provided, but every effort will be made to respond earlier.

## **Making a complaint**

9. Complaints may be sent to the appropriate people as described below and contain as much detail as possible. Before a formal complaint is made, check that Stage 1 and Stage 2 of the Principles of Resolution have been followed.

## **Who can make a complaint and where should it be directed?**

10. Anyone in parishes or deaneries can raise a complaint. It is expected that informal conversations and measures have been exhausted prior to making a formal complaint.
11. Those affected may complain informally or formally as follows:
  - Parishioners to their Churchwarden (\*this is the process in the Safe Church policy), Parish Priest, Area Dean or Archdeacon. [https://southwark.anglican.org/wp-content/uploads/2021/02/21\\_Complaints\\_Procedure.docx](https://southwark.anglican.org/wp-content/uploads/2021/02/21_Complaints_Procedure.docx)
  - Parish employees should use the parish grievance procedure for making complaints as stipulated in [https://southwark.anglican.org/wp-content/uploads/2021/02/ASC\\_Section\\_10\\_Forms\\_and\\_templates.pdf](https://southwark.anglican.org/wp-content/uploads/2021/02/ASC_Section_10_Forms_and_templates.pdf) Appendix 22 of a Safe Church.
  - Parish Priest to their Archdeacon, Area Dean or the Chaplain to the Bishop of Southwark. The [Clergy Grievance Procedure](#) outlines the informal processes to be followed, where alternative resolution has not been effective.
  - Lay ministers, PCC Officers to their Parish priest, Archdeacon, Area Dean, Warden of Readers, or Diocesan SPA as appropriate.
12. Every effort will be made to resolve complaints informally. However, the action which will be taken in relation to complaints of bullying or harassment will also be guided by Diocesan Policies, relevant regulations and relevant legal frameworks. In exceptional cases the advice of external Legal Advisers to the Diocese will be sought.

## **What will happen if a complaint is received?**

13. Once a complaint is received by email/letter we will endeavour to acknowledge within three working days of receipt. Where possible the acknowledgement will state what further steps may be taken, and what the complainant can expect will happen next. Complaints are varied, so it is important that each is dealt with according to issue, need, level of seriousness, further information needed, etc.
14. Where a complaint is taken by telephone, the details will be confirmed including name, address, contact details, nature of complaint – and this will be passed on to the appropriate person to call/write back to confirm the details and seek any clarification or further information that would be needed to progress the complaint.
15. Paperwork relating to all complaints received, actions taken, etc will be recorded and stored within appropriate [data protection provisions](#).

## **How will complaints be progressed and resolved?**

16. Wherever possible complaints will be resolved amicably, professionally and with pastoral care and sensitivity. Individuals making complaints will be dealt with courteously and professionally. Information will be clarified, and any further information sought.

17. Where possible the Diocese will try to mediate and intervene informally. There may be times when further consideration including legal action, police involvement is required. These will be considered on a case-by-case basis.
18. Whether the complaint is upheld or not, the reply to the complainant will set out how the complaint was progressed and conclusions and set out how a referral can be made. As appropriate, where actions/decisions are taken in relation to a complaint these will be shared with the complainant. This will not include personal information about person/s involved.

### **What happens if a complainant is unhappy with the outcome of their complaint?**

19. If the complainant feels that the problem has not been satisfactorily resolved, they are able to refer their complaint to the Diocesan Secretary or Diocesan Bishop.
20. After reviewing the available information, the Diocesan Secretary or Diocesan Bishop will make a final decision on any agreed outcomes or further investigation.

### **Reviewing this policy**

21. The Diocesan Referrals Group is responsible for ensuring this policy is shared across the management structures of the Diocesan Offices and wider Diocese.
22. The Diocesan Referral Group will review this policy at least triennially. The date of the policy/policy version will be indicated at the beginning of this policy.
23. The Diocesan Referrals Group is committed to learning from each case and the information we gain will improve the way we work in future.

Version 1

1 January 2025

## SOUTHWARK DIOCESAN VALUES

Adapted from the 7 Nolan Principles of Public Life for the Fit for Purpose Report 2015<sup>2</sup>

1. **Christian values** Trustees will seek to model and espouse Christlikeness and service. They will be people of prayer. They will be committed to supporting approved diocesan strategy for the furtherance of the mission of the Diocese of Southwark;
2. **Selflessness** Trustees should act solely in terms of the interests of the Church as the Body of Christ, the Diocese and the wider public. They should not **do** so in order to gain financial or other benefits for themselves, their family or their friends. They should take seriously their role as representatives, bringing parish views to meetings and reporting back to their electorate;
3. **Integrity** Trustees should not place themselves under any financial or other **obligation** to outside individuals or organisations that might seek to influence them in the performance of their official duties;
4. **Objectivity** In carrying out public business, including making public appointments, **awarding** contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit;
5. **Accountability** Trustees are accountable for their decisions and actions and must submit themselves to whatever scrutiny is appropriate to their office;
6. **Openness** Trustees should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict **information** only when the wider public interest clearly demands it;
7. **Honesty** Trustees have a duty to declare any private interests relating to their charitable, synodical or company duties and to take steps to resolve any conflicts arising in a way that protects the interest of the Diocese of Southwark, the wider Church and society;
8. **Leadership** Holders **of** public office should promote and support these principles by leadership and example.

The continued living out of these principles will embed them in our culture. It is therefore essential that when we adopt new structures, we also commit ourselves to renewed behaviour.

# DIOCESE OF SOUTHWARK DIGNITY AT WORK POLICY

1. The aim of the Dignity at Work Policy is to ensure that all employees:
  - are treated with dignity and respect;
  - are able to work and flourish in an environment free from harassment on the grounds of age, gender, sexual orientation, race, religion or belief, political opinion, marital status, disability, or nationality;
  - are aware that bullying and harassment are not acceptable and will not be tolerated;
  - understand how to raise concerns about bullying and harassment.
2. **Bullying** is behaviour which humiliates or demeans the individual involved and includes persistent criticism and personal abuse, either in public or private,
3. **Harassment** is unwanted conduct related to a protected characteristic under the Equality Act<sup>3</sup> that violates people's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This includes third party harassment where an employer is potentially liable for harassment of employees by third parties who are not employees, where the employer fails to take reasonable steps to prevent it. Harassment is from the perspective of the recipient of the treatment, and may vary between persons.
4. **Discrimination** may take a number of forms:
  - **Direct discrimination** - treating people less favourably than others because of an applicable protected characteristic;
  - **Indirect discrimination** - applying a provision, criterion or practice which disadvantages or would disadvantage people who share an applicable protected characteristic (and disadvantages the individual complainant), and which is not justified as a proportionate means of achieving a legitimate aim;
  - **Associative discrimination** – direct discrimination against someone because they associate with another person who possesses an applicable protected characteristic.
  - **Perceptive discrimination** – discrimination against an individual because they are mistakenly perceived to possess an applicable protected characteristic.
  - **Victimisation** – subjecting someone to a detriment because they have done (or the perpetrator believes they have done or may do) a "protected act", e.g. made a formal complaint of discrimination or given evidence in a tribunal case.
5. The Diocese of Southwark will not tolerate abuse, harassment and bullying, discrimination or victimisation – however rare. All complaints of abuse, harassment, bullying, discrimination or victimisation will be taken seriously and thoroughly investigated. Persons affected by such behaviour may complain informally or formally to their line manager, to the Director of HR, to the Deputy Diocesan Secretary who has a pastoral lead for DBF employees or to the Diocesan Secretary.

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<sup>3</sup> age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, gender, sexual orientation or religion or belief, including church tradition

# Diocesan Dignity at Work Policy

1. The aim of the Dignity at Work Policy is to ensure that all Clergy, Lay Ministers, Officers of the PCC, and Diocesan employees:
  - are treated with dignity and respect
  - are able to perform their roles and flourish in an environment free from harassment on the grounds of age, gender, sexual orientation, race, religion or belief, political opinion, marital status, disability, or nationality
  - are aware that bullying and harassment are not acceptable and will not be tolerated
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<sup>3</sup> age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, gender, sexual orientation, or religion or belief, including church tradition

investigated.

6. Persons affected by such behaviour may complain informally or formally as follows:

- Line Manager or to the Deputy Diocesan Secretary who has a pastoral lead for DBF employees, or to the Diocesan Secretary
- Parish Employees to their Parish Priest or Archdeacon
- Parish Priest to their Archdeacon, Area Dean or the Chaplain to the Bishop of Southwark
- Lay ministers, PCC Officers to their Parish priest, Archdeacon, Warden of Readers, or Diocesan SPA as appropriate.

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