



DIOCESE of OXFORD

A Christ-like Church for the sake of God's world

Dignity & Respect in Ministry and at Work Policy

A diocesan commitment to encouraging and sustaining healthy working relationships in ministry and employment; to embed a culture of mutual respect where bullying, harassment and discrimination are not tolerated across the Diocese of Oxford; and to provide healing where abuse of power has affronted an individual's dignity – thereby contributing to a more Christ-like Church for the sake of God's people.

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Policy Statement – Bishop’s Council

The Church is required by God to foster human relationships of the utmost integrity, truthfulness, and trustworthiness. Lack of respect, bullying, harassment and discrimination have no place and will not be tolerated in the Diocese of Oxford.

We recognise the importance of embedding a culture of mutual respect where individuals, whether lay or ordained, employed or working on a voluntary basis, feel safe and treat each other with dignity and respect. Committed to promoting positive workplace relationships, we adopt the following principles:

- ❖ A commitment to promoting dignity and respect to all
- ❖ Zero tolerance of bullying and harassment
- ❖ Nobody should be made to feel unwelcome or alone.

In addressing these matters, we commit to reflecting our diocesan values in everyday ministry and work. Any allegation deserves a quiet, measured, and contemplative consideration in which compassion is shown to both the complainant/ alleged victim and the alleged perpetrator. Courage will be needed to come forward when troubled as a victim in a pastoral or work setting - and in being ready, where the instigator of wrong behaviour has been identified, to accept the need to change.

This means participating in training relating to this policy, seeking timely expert professional advice where appropriate and providing suitable resources to facilitate prompt, fair, confidential and sensitive handling of concerns raised. Every single complaint will be taken seriously, thoroughly investigated and processed using diocesan procedures outlined here to ensure satisfactory resolutions for all concerned.

Dignity and respect are requisites for a healthy professional environment where everyone feels valued performing work that is meaningful to the Diocese of Oxford and boosts our reputation for being a great place to work and a Christ-like Church.

Together, all of this will help promote positive relationships and build an environment where lack of respect, bullying, harassment, and unlawful discrimination is much less likely to occur and more readily addressed when it does.

+Steven Oxford
On behalf of Bishop’s Council

Purpose of Policy

The Church welcomes us all regardless of age, colour or ethnicity, religion or belief, sexuality, gender, disability, or nationality - or indeed Church traditions. The Bible helps us to learn how to love and serve everyone. God's word stands for honesty, equality, kindness, compassion; for treating people the way you want to be treated and for helping those in need.

These are unchanging values even as our world is changing in new and unprecedented ways. We must think afresh about inequalities in our communities, imbalances in power relationships, and what it means to be human in those settings. Within God's worshipping community, we need to be the best Church we can be in and for these times. As the Church, we are called to create a loving community that models our diocese's common vision to be a more Christ-like Church for the sake of God's world, led through our values of being compassionate, contemplative, and courageous in all that we do.

Jesus' 'golden rule' citing Leviticus is "Do unto others as you would have them do unto you." (Mt 7:12) The question, "Would I want that said or done to me?" should be asked by us of ourselves before taking any action involving others. Neither should we fail to do the good things we would expect of others. Nevertheless, we are all less than perfect. For a variety of reasons and sometimes unknowingly, people occasionally use behaviour that is considered by others unacceptable. An essential first step in both preventing and dealing with such failures when they occur is to acknowledge, recognise and address the concern at hand. Jesus directs us to do this and lays out a process for it within the Church (Mt 18:15-17).

Fostering a culture where an admission of failure is met with understanding and forgiveness, as opposed to blaming and retribution, will encourage honest self-reflection that could, in turn, lead to an apology and thus rebuild relationships. Early interventions are likely to lead to positive outcomes. Whilst human weakness may explain bullying and harassment, it by no means excuses it. If left undealt with it can often escalate; with appropriate support, the relationship can often be restored.

In everything, do to others what you would have them to do to you. Bullying and harassment, whether intentional or not, can greatly undermine the effectiveness and witness of Christians and the Church to which they belong. They are also deeply hurtful for those involved. Crucially, in a Christian setting, the call to love and forgive may lead individuals who feel bullied or harassed to hesitate or even refrain from seeking appropriate help and support.

Therefore, the purpose of this policy is to set out the framework in which bullying and harassment can be defined and recognised and wherever possible, behaviours changed, relationships rebuilt with trust restored. What was damaged in ministry and work can be made effective once again, if tackled promptly and appropriately.

Scope

This Policy and the Procedure that accompanies it, apply to the behaviour of clergy on common tenure or those who hold other Bishop's licences, ODBE/ODBF employees, all Licenced Lay Ministers (LLMs), PCC employees, Churchwardens and elected members of the PCCs. They also apply to behaviour by volunteers, visitors and third parties (including contractors and trustees or an individual who has been affected by another individual who holds a role within the Diocese of Oxford).

This Policy and the Procedure that accompanies it, apply to behaviour both on and beyond the Diocese of Oxford premises and parishes during conferences, trips, events as well as inside and outside usual working hours. They can apply to behaviour that has a connection, either directly or by reasonable inference, to the Diocese of Oxford and/ or may bring the Diocese into disrepute.

Mutual responsibilities

The Diocese of Oxford has a legal responsibility under the [Equality Act 2010](#) to prevent and protect unlawful bullying, harassment, discrimination and/ or victimisation and other behaviour prohibited by the Act, on the grounds of someone's protected characteristics (Age, Disability, Gender Reassignment, Race, Religion or Belief, Sex and Sexual Orientation). This includes fulfilling the requirements of the [statutory Sexual harassment and harassment at work: technical guidance](#) first published on 15 January 2020.

The Diocese of Oxford will ensure that all reports under this policy are treated seriously and in a sensitive manner, with due regard to confidentiality and the rights of all parties involved. All parties will receive support through the internal and/ or external available sources.

Furthermore, the Diocese of Oxford will ensure this policy is accessible to all and is widely promoted using a variety of methods to raise awareness and instil the importance of dignity and respect in ministry and at work.

Each individual can reasonably expect to:

- Be treated with dignity and respect;
- Be treated fairly and without discrimination;
- Disagree and present alternative views;
- Challenge and be assertive;
- Be consulted on decisions that affect their work;
- Have their contribution recognised.

Each individual also has the following responsibilities:

- To demonstrate dignity, respect, and integrity in all interactions with others;
- To appropriately challenge inappropriate behaviours when it occurs;
- To respect the authority and decisions of others;
- To participate openly in the investigation of complaints;
- To provide support to individuals who are experiencing bullying or harassment and respect their confidence;

- To report any unfair treatment witnessed to the relevant manager or supervisor if it causes personal discomfort.
- Undertake relevant training as part of their induction as well as their continuous personal and professional development and apply this to their ongoing practice.

In addition to the above, **those with management or supervisory responsibilities** (e.g., HoD, Bishop/ Archdeacon/ Area Deans/ Incumbents) are required to:

- Lead by example, role modelling positive inclusive behaviour, promoting a culture of dignity and respect within their area of work and an environment where individuals feel able to raise complaints without fear of victimisation;
- Communicate, implement and promote this policy, making sure everyone within their area of responsibility is aware of it, understands their responsibility and has received the appropriate training;
- Manage/ supervise their individuals fairly and in line with all the diocesan HR policies and procedures, taking action when necessary to ensure their working environment is free from bullying and harassment;
- On receipt of any allegation/ concerns relating to bullying, harassment, discrimination, or victimisation, act as promptly and effectively as possible in accordance with the relevant procedure;
- Undertake actions to help resolve allegations/ concerns informally wherever possible and appropriate;
- Learn from any concerns raised (where these are founded e.g., following an investigation) and take the appropriate action to prevent or mitigate any reoccurrence;
- Keep a record of reported incidents and action following any allegation made;
- Refer any individual who may be suffering stress or anxiety related to bullying or harassment to the relevant service/s

Human Resources (HR) have the responsibility to:

- Regularly review this policy ensuring its continuous commitment to promoting dignity and respect in ministry and at work;
- Provide support and advice to managers and supervisors in managing these types of situations;
- Work with all parties to identify an appropriate resolution;
- Safeguard confidential information on bullying, harassment and discrimination cases, escalating accordingly if a criminal offence such as physical or sexual assault and/ or an immediate threat to safety has been committed/ suspected.

Authorised Listeners have the responsibility to:

- Be available to any member of the clergy, employee, or laity to listen and discuss the individual's situation;
- Provide clear information, help and guidance about the options available, the next steps to take and how best to take them;
- Signpost the individual to the relevant resources and offer support throughout the process.
- Remain unbiased, impartial and maintain confidentiality.

What is bullying and harassment?

Any behaviour that could potentially undermine someone's dignity and respect should be regarded as unacceptable. If it is not challenged, it is likely to 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 in the work-place, which includes the context of a parish.

'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 issued subsequently resolved."

Fergus Roseburgh for The Children's Society. March 2007.

Similarly, the Advice, Conciliation & Arbitration Service states that: "... **Bullying** may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient".¹ It is a behaviour from a person or group towards another person or group that is unwanted and makes one feel uncomfortable by isolating the person and focusing on distorted or fabricated allegations. It often includes threats, abuse, teasing and practical 'jokes' which make the recipient feel upset, threatened, humiliated or vulnerable. For the [most common forms of bullying and harassment, please see Appendix A](#).

Bullying is not defined by law. However, should it be related to one of the 'Protected Characteristics' as defined in the Equality Act 2010, it is likely to constitute **harassment** under this Act and be unlawful. Refer to [Appendix B for examples of behaviour that may constitute harassment under this Act](#).

The **Equality Act 2010** provides a legal framework to protect the rights of individuals gives and advance equality of opportunity for all. It protects against discrimination, harassment, and victimisation through nine "protected characteristics" - Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex or Sexual Orientation.

Harassment, as defined in the Equality Act 2010, is "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive

¹ Bullying and harassment at work, ACAS (Advice, Conciliation & Arbitration Service) – June 2014

environment for that individual”.² Unwanted behaviour could include physical gestures, abuse, jokes, spoken or written words or offensive emails and expressions. It may be a one-off or continuous incident. The impact of harassment needs to be recognised. People suffering harassment need to have confidence they are being listened to and taken seriously.

Furthermore, **discrimination** means treating a person unfairly or less favourable because of who they are or because they possess certain protected characteristics.

Some people think that sexual remarks, for example, ‘jokes’ and touching is just a bit of fun at work, that racial stereotypes, anti-gay banter, or name-calling related to age or disability are only objected to by those with no sense of humour. But where this attention is unwanted, it can cause a great deal of distress, through embarrassment, intimidation, isolation, and exclusion and is likely to constitute harassment. Our commitment against lack of respect, bullying, harassment, and discrimination is not about stopping social banter between friends but ensuring that all members feel safe and comfortable in their working environment.

Employees and officeholders can bring complaints under this Act and other legislation covering discrimination and harassment.

Sexual harassment is a form of unlawful discrimination under the Equality Act 2010. Sexual harassment is unwanted behaviour of a sexual nature which can violate your dignity, make you feel intimidated, degraded, or humiliated and/ or creates a hostile or offensive environment.

You do not need to have previously objected to someone's behaviour for it to be considered unwanted. Additionally, the law says its sexual harassment if the behaviour is either meant to or has the effect described above. What some people might consider as joking, 'banter' or part of their 'friendliness' can still be sexual harassment if the behaviour is of a sexual nature and it is **unwanted**.

If you are treated badly or less favourably because of your reaction to sexual harassment, you may have a claim under the Equality Act. The Act says this is also harassment. You are protected if you reject or submit to the harassment.

Power and relationships

Power in the context of human relationships is the capacity to influence the behaviour, thoughts, emotions and attitudes of other people. This is the power to make things happen in human society or to resist and prevent change and is derived from a variety of sources. Human power can be used for good or ill. It is life-enhancing when used well but is damaging and potentially dangerous when used to dominate or control. To understand [the culture of the Church as it relates to power and relationships, please see Appendix C](#).

Spiritual Abuse is a form of emotional and psychological abuse that is characterised by a systematic pattern of coercive and controlling behaviour in a religious context. Spiritual abuse can have a deeply damaging impact on those who experience it. Therefore, the focus must be on creating healthy Christian cultures in which everyone thrives and where

² Bullying and harassment at work, ACAS (Advice, Conciliation & Arbitration Service) – June 2014

coercive and controlling behaviour can be challenged wherever it is exhibited. Such abuse may include *“manipulation and exploitation, enforced accountability, censorship of decision-making, the requirement of secrecy and silence, coercion to conform, control through the use of sacred texts or teaching, the requirement of obedience to the abuser, the suggestion that the abuser has a ‘divine’ position or isolation as a means of punishment, and superiority and elitism.”*

Patterns of bullying and harassment behaviour

Bullying is often not obvious to others and may have to be identified through the exploration of patterns of behaviour. When bullying behaviours are covert and passive it can be particularly difficult to complain because each incident on its own appears trivial. It may be the constant repetition and sustained nature or conversely the unpredictability of behaviour, which transforms seemingly trivial incidents into bullying or harassment.

Some people, because of previous experiences of being bullied or abused, or of knowing someone who has previously been bullied or abused, whether as a child or in adult life, maybe more vulnerable. This does not mean they are to blame for what is happening. Responsibility remains with the alleged perpetrator. Those who bully often sense who are most vulnerable or lacking in power and repeat patterns of bullying behaviour in different contexts.

Sometimes patterns of bullying behaviour seem to be endemic in particular parishes, benefices, or organisations. Such behaviour may have become entrenched because of failures in structures, poor leadership, or through domination by particular individuals, families, or groups, sometimes over many years. In these situations, a newcomer, e.g., a new incumbent or curate, can be on the receiving end of increased bullying and can find this particularly difficult to challenge.

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 normally defined as bullying. Often, there are no witnesses and the victim is afraid of taking action.

Feedback

Behaviour considered bullying or harassment by one person may be considered firm management or forthrightness by another. It is, therefore, important to distinguish between bullying and harassment and respectfully given constructive feedback or disagreement with beliefs or opinions. Setting reasonable performance goals, standards, or deadlines, giving reasonable directives, feedback or assessments of performance or behaviour, or taking legitimate disciplinary action are not bullying or harassment. These are sometimes interpreted as bullying or harassment because the recipient is not used to being challenged or asked to account for their actions. Alternatively, the person giving feedback may lack skills in giving respectful and effective feedback and may need guidance and training in how to do this without causing unnecessary stress and distress.

It is legitimate to raise genuine concerns about performance and behaviour. However, this needs to be done sensitively and without aggression, in the awareness that no-one likes being criticised and that the aim is to improve performance and not to undermine the

person. Effective feedback offers the maximum useful information with the minimum of stress or threat. Feedback should not be given in a public situation and must avoid threats or intimidating behaviour such as shouting, swearing or personal insults. It should be specific and accurate, describing the action/s, not the person, avoiding judgemental labels (thoughtless, selfish, inconsiderate, incompetent etc.) and generalisations or exaggerations ('You never ...' 'You always ...').

Differences in attitude, management/ supervisory styles coupled with culture and the misinterpretation of social signals can mean that what is perceived as bullying or harassment by one person may not seem so to another. It is, therefore, important to have an understanding of what is considered healthy conflict and firm management/ supervision opposed to that of a bullying nature, remembering the importance of how it is perceived.

The key principles of good management are to treat staff/ officeholders fairly, communicate effectively and use appropriate measures to support performance improvements. For an extended list of [examples of behaviours, conflict, and firm but fair management approaches refer to Appendix D.](#)

Effects of bullying and harassment

Bullying and harassment cause the recipient to feel anxious and humiliated. A person who is being bullied is likely to feel isolated and disempowered and fear that they will not be believed. They may fear that, if they complain that they find the actions of others intimidating, they risk being accused of over-reacting, of being weak or not up to the job and lacking resilience. For example, a woman may feel especially vulnerable in making a complaint against a man in a leadership position within the Church, fearing that her perspective and experience may not be understood by male senior staff; or a curate may be reluctant to tell their training incumbent about the intimidating behaviour of a churchwarden.

Someone being bullied may feel anger and tries to retaliate, giving the person who is bullying apparent justification for their actions and possibly being mistakenly identified as the bully. More concerning, a previously self-assured person can quickly lose self-esteem and become frightened and disorientated when subjected to bullying or harassment.

If bullying persists, they will almost always need the support of a third party to hear their story and help them find the strength to initiate and sustain an action against it. Stress, loss of self-confidence and self-esteem caused by harassment or bullying can lead to illness, absence from work and even resignation. Almost always, performance and relationships suffer from effects that can be long term and sometimes permanent.

Right to report bullying/harassment

Everyone has a right to report any behaviour towards them or others which they believe constitutes harassment or bullying. This will include behaviour that has caused offence, humiliation, embarrassment, or distress. This can be behaviour by a colleague or a by a third party, for example, a staff member from another diocese, a client or supplier. Those who raise a genuine complaint under this policy will under no circumstances be subjected to any unfavourable treatment or victimisation as a result of making a complaint.

Anyone who witnesses an incident that he/she believes to be the bullying or harassment of another member of staff or clergy should report the incident in confidence to an Authorised Listener or your Line Manager or Supervising Minister. All such reports will be taken seriously and in strict confidence as far as it is possible to do so. If the incident gives rise to a concern about the practice, performance or behaviour relating to the safeguarding of children or adults who may be vulnerable, the Diocesan Safeguarding Adviser should also be informed, and it will be investigated according to the national Church's procedures for allegations ([Practice Guidance: Responding to, assessing and managing safeguarding concerns or allegations against church officers](#)).

Reluctance to complain

If other people do not appear to react to what is happening, the person being bullied may think 'this is normal in this group of people or workplace' and assume it is something they must learn to tolerate. Witnesses may be so relieved not to be the focus of such behaviour that they collude to avoid attention or don't complain due to fear of the consequences.

Both recipient and witnesses may fear that they will not be believed or that there will be retribution if they complain. They may also fear that, if they complain, they may have to face the upheaval of moving workplace or to minister or worship in a different place.

A person making a complaint needs the assurance that their complaint will be given due attention, treated confidentially, that they will be consulted and fully informed before any action is taken and that they will not be asked to confront the person about whom they are complaining, unless or until they feel ready to do so. The complaint must be investigated especially where there is a safety risk, particularly to children or vulnerable adults.

Fear of not being believed may be reinforced if 'the final straw' is something minor but follows on from an accumulation of other incidents. Both recipients of bullying and those to whom a complaint is made may find it hard to accept that fellow Christians - lay or ordained, women or men - may bully and harass or be the complainant/ alleged victim of such behaviour. They may wrongly interpret bullying as a personality clash or mistakenly assume that it is their Christian duty to put up with bullying or abusive behaviour by others.

Deliberate or malicious behaviour

People who deliberately or maliciously bully or harass do not commonly do so in front of those whose power or authority they respect or fear. They may be likeable and pleasant in many other situations and may be skilful at concealing what is happening, only bullying, or harassing those whom they sense are vulnerable, unlikely to make a complaint or to be believed. It can be very hard for people who have never experienced bullying or harassment themselves or have not been in a position of vulnerability and powerlessness, to recognise that someone who is amiable and charming in their presence or appears to be a good and committed Christian may be capable of such behaviour. A person prone to bullying and harassing and not open to self-examination is likely to adopt a threefold strategy of defence when confronted with a complaint, namely denial, counterattack against the complainant (who may well have been provoked into behaving badly in an attempt at self-defence) and presenting themselves as the victim ('poor me') of the person making the complaint, thereby gaining sympathy.

Having placated authority during an investigation, a person who habitually bullies or harasses may return to their previous pattern of behaviour, targeting the same person or finding an alternative victim. Whatever the outcome of a complaint, subsequent monitoring is essential to ensure that the behaviour does not recur.

It needs to be added that sometimes false accusations are made – rarely but they need to be noted. People do not normally make serious accusations unless they feel seriously aggrieved. For most, it is extremely difficult to make a complaint and the far greater risk is that people delay longer than they should. **However, deliberately unfounded, or malicious complaints or allegations will be investigated and dealt with fairly and objectively and, where appropriate, formal action taken. An individual, whether clergy or laity, could be subject to an action for defamation if they have intentionally made false accusations against someone else.**

Procedures for dealing with allegations and concerns

Everyone in the Diocese of Oxford, be it ODBE/ODBF/PCC employee, officeholder, lay leader, volunteer, has the right to be treated with dignity and respect.

Whilst the scope of this policy extends to all the above categories, in the event of an allegation of bullying or harassment **the procedure to be followed should be the one applicable to the alleged perpetrator**. Refer to [Appendix E 'At a glance' procedure flowchart and the procedural narrative](#).

What next?

If you think [you have been the target of bullying or harassment, please read Appendix F](#). If [you have been accused of bullying or harassment, please read Appendix G](#). They both advise on what actions to take including resources available as well as ways of handling a bullying and harassment case under this policy.

Confidentiality

The Diocese of Oxford will treat all matters made under this Policy and its accompanying procedure as confidential, recognising that if safeguarding issues arise there may be occasions where confidentiality has to be breached. Where information is required to be shared, this will only be provided to those who require it and wherever possible in communication with the individual who raised the concern. Individuals affected by bullying and harassment should be offered appropriate support and action taken only with their consent.