



Southwell Cathedral

HARASSMENT AND BULLYING POLICY

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1. Introduction

Southwell Cathedral recognises its responsibility to provide a safe environment for all employees, clergy, volunteers and visitors, where everyone is treated with dignity and respect and feels valued and appreciated.

As a living Christian church, the Cathedral offers sacred space and common ground to all, and is called to foster a culture of care, compassion and mutual respect, upholding the dignity of every individual. Harassment, bullying and any form of abuse will not be tolerated in any form.

Everyone who is part of cathedral life – whether temporarily as a visitor or as a member of the wider cathedral community – is expected to treat others with dignity and respect at all times. Where these expectations are not met, the Cathedral will take appropriate action.

This policy should be read in conjunction with the Equality, Diversity and Inclusion Policy.

2. Scope

This policy applies to all clergy, employees, officers, consultants, contractors, volunteers, casual workers, interns, agency workers, visitors and members of the public who come into contact with the Cathedral.

3. What is harassment and bullying?

The terms **harassment** and **bullying** are often used interchangeably. While they are distinct concepts, the impact of either behaviour on an individual can be equally serious.

Harassment

Harassment is defined under the Equality Act 2010 as:

‘Unwanted physical, verbal or non-verbal conduct related to a relevant protected characteristic, which has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.’

The protected characteristics are listed in Appendix C.

Bullying

Bullying has no specific legal definition. It may, however, constitute harassment where it is connected to a protected characteristic.

Bullying can be described as offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, intended to undermine, humiliate, denigrate or injure the recipient.

How harassment and bullying may occur

- Behaviour may be persistent or a single incident.
- A single incident can be sufficiently serious to constitute harassment or bullying.

- Behaviour may be obvious or subtle and insidious.
- It may take place face-to-face or via written communication, email, telephone, social media or third parties.
- It may occur in the workplace, during work-related activities, or at cathedral events, whether on or off cathedral premises.
- It may be carried out by individuals or groups.
- Harassment and bullying are always unwarranted and unwanted by the person experiencing them.

In some cases, interactions with line managers, volunteer managers, cathedral employees or clergy may feel unwelcome. Where such interactions arise from the legitimate and reasonable implementation of cathedral policies or management responsibilities, they are unlikely to constitute harassment or bullying.

Examples of behaviour that may constitute harassment or bullying are provided in Appendix A and Appendix B, together with additional explanatory guidance.

The legal definition of harassment is set out in Appendix C.

Where harassment or bullying raises safeguarding concerns, particularly involving children or vulnerable adults, the Safeguarding Policy, Procedure & Guidance will apply.

4. Sexual harassment

Sexual harassment is a specific form of harassment and is addressed in detail in Appendix A. The Worker Protection (Amendment of Equality Act 2010) Act 2023 requires employers to take reasonable steps to prevent sexual harassment of employees. This includes sexual harassment by employees, volunteers, visitors and other third parties.

Sexual harassment is defined as unwanted conduct of a sexual nature. The conduct does not need to be sexually motivated; it is sufficient that it is sexual in nature.

Although the legislation applies specifically to employees, Southwell Cathedral extends the same protection to volunteers.

Sexual harassment of an employee or volunteer that takes place on the cathedral estate, or arises as a consequence of their connection with the Cathedral, will not be tolerated. In determining whether conduct constitutes sexual harassment and whether it is unwanted, full account will be taken of the perspective of the employee or volunteer.

Raising concerns about sexual harassment

An employee or volunteer should raise concerns about sexual harassment – whether by an employee, volunteer or third party – by:

- informing their line manager or volunteer manager; and/or
- following the procedures set out in Section 5 of this policy.

Concerns may also be raised under:

- the informal or formal stages of the Employee Grievance Procedure; or
- the Complaints Procedure for Volunteers.

Where behaviour is sufficiently serious, or where concerns have previously been raised and harassment continues, the matter may be investigated under the formal stages of the relevant procedure.

The Cathedral's priority is to ensure that employees and volunteers feel safe, supported and protected. While formal procedures may be used where appropriate, action may also be taken outside of formal processes where this is necessary to safeguard individuals.

Immediate risk

If there is an immediate risk to an employee or volunteer:

- A senior staff member should be notified immediately: this may be the Chief Operating Officer, the Dean, a Residentiary Canon or, if the immediate risk is in the Minster building or Archbishop's Palace, the Verger on Duty.
- The police should be contacted where appropriate.
- The individual should be taken to a safe place away from the alleged perpetrator.
- Appropriate support should be provided, including transport to a place of safety.

Investigation and protective measures

The relevant manager will investigate concerns under the appropriate policy and carry out a risk assessment to determine further actions to protect employees and volunteers.

Protective measures may include:

- Avoidance of lone working.
- Provision of panic alarms.
- Training.
- Exclusion of the perpetrator.
- Safeguarding agreements.

Further examples of sexual harassment are included in Appendix A.

5. Procedure to resolve harassment or bullying

Informal steps

If you believe you are experiencing harassment or bullying (including sexual harassment), you may choose to address this informally where appropriate.

Options include:

- Speaking directly to the individual, explaining how their behaviour affects you and asking them to change.
- Writing to the individual with clear examples and a request for change.
- Speaking to your line manager or a trusted colleague for support in preparing for a conversation or written communication.

Supporters may assist you in preparing for action but should not act as intermediaries or speak on your behalf.

Formal complaint

If informal steps have not resolved the issue, or if the behaviour is too serious to address informally, a formal complaint may be made.

Employees or workers should use the Employee Grievance Procedure.

Volunteers should use the Complaints Policy for Volunteers.

Visitors and members of the public should use the Complaints Policy.

Complaints must be raised by the individual affected. While support is available, others cannot submit or pursue complaints on someone's behalf.

This approach ensures that allegations are addressed clearly and appropriately and avoids misunderstanding or ambiguity.

Resolution

The aim of any grievance or complaints process is to resolve the situation fairly and appropriately.

Where complaints are upheld and considered sufficiently serious, formal action may be taken, including:

- Disciplinary action (employees).
- Removal from a volunteer role (excluding elected roles).

Other possible outcomes may include:

- Facilitated conversations.
- Formal mediation by an external mediator.
- Management arrangements to reduce contact, clarify roles or manage interactions.

Where a complaint is upheld, appropriate monitoring arrangements will be put in place to ensure the behaviour does not recur.

6. Confidentiality

Making a complaint of harassment or bullying can be difficult. All parties involved – including witnesses, supporters, investigators and managers – must maintain strict confidentiality.

Where information must be shared to enable resolution, the complainant will be informed in advance.

If a complaint is made confidentially but the complainant does not wish to be identified or for action to be taken, the recipient of the complaint must respect that request and cannot pursue the matter on the complainant's behalf.

7. Everyone's responsibility

Harassment and bullying often isolate the individual experiencing them and may lead to fear, anxiety or loss of confidence. As a result, individuals may not report such behaviour.

Where employees or volunteers witness behaviour that is inappropriate – even if it is not directed at them or they do not personally find it offensive – they are encouraged to report concerns to their manager.

Creating a safe environment at the Cathedral is a shared responsibility. Everyone has a role in identifying, challenging and preventing harassment and bullying.

Appendix A: Examples of harassment and bullying

The following examples are **not exhaustive** but are intended to illustrate behaviours that may constitute harassment or bullying. While extreme cases are often easy to identify, harassment and bullying can also occur in more subtle or ambiguous ('grey area') forms.

Examples of harassment

Harassment includes unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Examples include, but are not limited to:

- **Unwanted physical conduct or 'horseplay'**, ranging from touching, pinching, pushing, brushing past someone or invading their personal space, through to grabbing, shoving, punching and more serious forms of physical or sexual assault.
- **Unwelcome sexual behaviour**, which the harasser may perceive as harmless flirting, including standing too close or touching, and which may also involve unwanted suggestions, advances, propositions or pressure for sexual activity.
- **Suggestions that sexual favours may further a career**, or that refusal of such favours may hinder career progression.
- **Repeated invitations or suggestions for social activity**, inside or outside the workplace, after it has been made clear that these are unwelcome.
- **Offensive, intimidating or degrading comments or gestures**, including insensitive jokes or pranks.
- **Sending, sharing or displaying offensive material**, including pornographic or obscene material, or content that individuals or groups may find offensive (for example emails, text messages, images, videos or online content).
- **Spreading malicious rumours or insults**, particularly where this is related to a protected characteristic.
- **Ignoring, isolating or shunning someone**, for example deliberately excluding them from conversations, meetings or workplace social activities.

Examples of bullying

Bullying is characterised by offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power intended to undermine, humiliate, denigrate or injure the recipient. Examples include:

- Shouting at, ridiculing, mocking, being sarcastic towards or demeaning others.
- Using emails, voicemail, anonymous letters or social media to insult or deliver destructive criticism.
- Copying others into critical communications unnecessarily.
- Physical or psychological threats.
- Overbearing, excessive or intimidating supervision.
- Repeatedly ridiculing or undermining someone, either privately or in front of others.
- Abuse of authority or power by individuals in positions of seniority.

- Inappropriate or derogatory remarks about someone's performance.
- Unjustified exclusion from meetings, communications, activities or access to relevant information.
- Victimisation or unfair treatment.
- Misuse of position or influence.
- Making threats or unwarranted comments about job security, future prospects or career progression.
- Unfairly blocking access to training, promotion or future opportunities.
- Claiming formal or informal influence over others and threatening to use it to undermine or jeopardise someone.
- Deliberately overloading someone with work or subjecting them to constant destructive criticism.
- Shouting or swearing at a person, in public or private, face-to-face or by telephone.
- Using aggressive or intimidating gestures (with or without physical contact), such as pointing in someone's face, pushing or shoving.
- Alternating bullying behaviour with charm or kindness, which can confuse the individual and undermine their confidence or resolve to take action.

Sexual harassment

Sexual harassment occurs when an employee or volunteer is subjected to **unwanted or uninvited conduct of a sexual nature**. The conduct does not need to be sexually motivated; it only needs to be sexual in nature.

Unwanted conduct may include, but is not limited to:

- Spoken or written words.
- Banter.
- Posts, messages or contact on social media.
- Images or other visual material.
- Physical gestures.
- Mimicry.
- Jokes or pranks.
- Physical behaviour towards a person or their property.

Understanding when harassment and bullying may occur

Harassment and bullying may be **persistent or a single incident**. A single act of unwanted or offensive behaviour may be sufficient to constitute harassment or bullying, particularly where it has a significant impact on the individual.

Such behaviour does not need to occur face-to-face. It may take place through written communication, email, telephone, third parties or social media. Some of the most damaging behaviours include spreading malicious rumours or innuendo, or deliberately refusing to acknowledge or interact with an individual.

Harassment and bullying may occur in any setting connected with work or volunteering, including the workplace, work-related travel, events or social functions, whether on or off cathedral premises. The impact may be intensified when behaviour takes place in front of others who feel unable to challenge it, or in private where there are no witnesses.

Harassment or bullying may be carried out by an individual or by groups. It may be overt or subtle, but in all cases it is unwarranted and unwanted by the person experiencing it.

In cases of harassment, individuals may complain about behaviour directed at a protected characteristic **even if it is not aimed directly at them**, where it creates a hostile or intimidating environment. For example, racist jokes about a different ethnic group may still constitute harassment if they create an offensive environment.

Care should always be taken with banter. Even where individuals involved are comfortable with it, it may be unwelcome or offensive to others who overhear or witness it, particularly where it relates to protected characteristics.

Where someone carrying out bullying claims that others share their views (for example, stating 'others have also said...' or implying support from those in authority), this can intensify the impact and further isolate the person experiencing the behaviour.

Appendix B: Additional guidance on identifying harassment and bullying

Patterns of behaviour

Harassment and bullying are often **not immediately obvious** and may need to be identified by examining patterns of behaviour over time. Where bullying behaviours are covert or passive, it can be particularly difficult to raise concerns, as individual incidents may appear trivial when viewed in isolation. It is often the **repetition, cumulative effect or unpredictability** of behaviour that transforms seemingly minor incidents into harassment or bullying.

Behaviour experienced as harassment or bullying may also arise from **unintentional misunderstandings, lack of awareness or insensitivity**, particularly where there is an imbalance of power. Some individuals may be more vulnerable due to previous experiences of being bullied or abused, either personally or through someone close to them. This does **not** make them responsible for what is happening. Responsibility always rests with the person engaging in the behaviour.

Those who bully often sense who is most vulnerable or lacks power and may repeat patterns of bullying behaviour across different contexts and relationships.

Understanding the effects of harassment and bullying

Impact on individuals

Harassment and bullying can cause individuals to feel anxious, humiliated, isolated and disempowered. A person experiencing bullying may fear that they will not be believed or that, if they raise concerns, they will be accused of over-reacting, being weak, lacking resilience or not being capable of their role.

For example, a woman may feel particularly vulnerable when considering making a complaint against a man in a leadership position within the Church, fearing that her experience may not be fully understood or taken seriously by senior managers.

Individuals may experience anger and frustration and may attempt to defend themselves or retaliate. This can sometimes be misinterpreted as aggressive behaviour, potentially leading to the person experiencing bullying being mistakenly identified as the perpetrator.

Even individuals who are normally confident and self-assured can quickly lose self-esteem and become frightened or disorientated when subjected to bullying or harassment. Where such behaviour persists, people often require the support of a third party to help them articulate their experience and sustain action.

The effects of harassment and bullying may include stress, illness, loss of confidence, absence from work and, in some cases, resignation. Work performance and relationships frequently suffer, and the impact can be long-term or permanent.

Reluctance to complain

Where others do not challenge or appear to react to inappropriate behaviour, the person experiencing bullying may assume that it is normal within that setting and feel they must tolerate it. Witnesses may feel relieved not to be the target themselves and may avoid intervening or reporting concerns out of fear or self-protection.

Both those experiencing harassment or bullying and those witnessing it may fear that they will not be believed or that they will face negative consequences if they speak up. In a church context, individuals may also fear the emotional and practical consequences of having to move to a different place of worship or ministry.

Anyone making a complaint needs reassurance that:

- their concerns will be treated confidentially,
- they will be consulted and kept informed before action is taken, and
- they will not be required to confront the person complained about unless or until they feel ready.

There may, however, be exceptional circumstances where concerns must be investigated without consent, particularly where there is a risk to the safety of others, including children or vulnerable adults.

Fear of not being believed may be heightened where the 'final straw' appears minor but follows a series of earlier incidents. Within Christian contexts, there can be reluctance to accept that fellow Christians – lay or ordained, women or men – may bully or harass others or be victims of such behaviour. This can lead to bullying being minimised or mischaracterised as a personality clash.

The reality is that, however uncomfortable it may be, bullying and harassment do occur within the Church and must be recognised and addressed.

Deliberate or malicious behaviour

Individuals who deliberately or maliciously harass or bully rarely do so in the presence of those whose authority they respect or fear. They may appear personable, likeable or committed in many settings, while targeting individuals they perceive as vulnerable or unlikely to be believed.

For those who have not experienced bullying or who have not been in a position of powerlessness, it can be difficult to recognise that someone who appears amiable or devout may be capable of such behaviour.

When confronted with a complaint, individuals who engage in bullying and are unwilling to reflect on their behaviour may adopt a threefold defensive strategy:

- **Denial** of the behaviour.
- **Counter-attack** against the complainant (who may have been provoked into reactive behaviour).
- **Presenting themselves as the victim**, thereby gaining sympathy and deflecting responsibility.

Even where a complaint has been investigated and addressed, there is a risk that a habitual bully may return to previous patterns of behaviour, either towards the same individual or a new target. For this reason, **ongoing monitoring** following an investigation is essential to ensure that inappropriate behaviour does not recur.

Critical feedback

Behaviour perceived as harassment or bullying by one person may, in another context, constitute **firm but legitimate management** or robust disagreement. It is therefore important to distinguish between harassment or bullying and **respectfully delivered critical feedback**, differences of opinion, or the proper exercise of management responsibilities.

Setting reasonable performance goals, standards or deadlines; giving clear instructions; providing feedback or assessments of performance or behaviour; and taking legitimate disciplinary action do **not** constitute harassment or bullying.

There may be occasions where shortcomings in performance are being addressed and the recipient interprets critical feedback as bullying or harassment, particularly where they are unaccustomed to challenge or accountability. Conversely, the person giving feedback may lack the skills or awareness to deliver criticism respectfully and effectively and may require guidance or training to avoid causing unnecessary distress.

It is legitimate and necessary to raise genuine concerns about performance or behaviour. However, this must be done **sensitively, proportionately and without aggression**, recognising that criticism is rarely welcome and that the purpose of feedback is to support improvement, not to undermine the individual.

Effective critical feedback should:

- Provide the **maximum useful information** with the **minimum of stress or threat**.
- Be delivered in a **private setting**, unless exceptional circumstances require another person to be present for the protection of both parties.
- Be **specific and factual**, focusing on actions or behaviours rather than personal attributes.
- Avoid judgmental language (such as 'thoughtless', 'selfish' or 'incompetent') and generalisations or exaggerations (such as 'you always' or 'you never').

Those giving critical feedback must avoid threatening, aggressive or intimidating behaviour, including shouting, swearing or personal insults. Likewise, those receiving criticism are expected not to respond aggressively.

False accusations

People rarely make serious complaints unless they feel genuinely aggrieved, and experience shows that the greater risk is that concerns are raised **too late rather than too early**.

However, deliberately unfounded, malicious or knowingly false complaints or allegations will be investigated fairly and objectively. Where appropriate, such behaviour may result in formal action being taken under the Employee Disciplinary Procedure.

An individual, whether clergy or lay, may also be subject to legal action for defamation if they intentionally make false accusations against another person.

Appendix C: Legal definitions

Harassment is defined in the Equality Act 2010 as any unwanted physical, verbal or non-verbal conduct related to a relevant protected characteristic that has the purpose or effect of violating an individual's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

The relevant **protected characteristics** under the Equality Act 2010 are:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race (including colour, nationality, ethnic or national origin).
- Religion or belief.
- Sex.
- Sexual orientation.

Harassment often, though not exclusively, targets an individual's gender, sexual orientation, marital or civil partnership status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, or age.

Sexual harassment is a specific form of harassment that is explicitly prohibited under the Equality Act 2010. Further guidance is available in *Dignity at Work (2008)*, Ministry Division of the Archbishops' Council.

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, through actions intended to undermine, humiliate, denigrate or injure the recipient.

Power may include both personal authority and the ability to coerce others through fear or intimidation. Bullying often undermines an individual's self-confidence, competence and self-esteem and, like harassment, may take physical, verbal or non-verbal forms.

Bullying is not defined as a specific offence in law. However, where bullying behaviour is related to one of the protected characteristics listed above, it is likely to constitute harassment under the Equality Act 2010 and therefore be unlawful.