

CIISA Standards

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CIISA

The Creative Industries
Independent Standards Authority
Independent. Without fear or favour.

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Foreword

By Baroness Helena Kennedy, Chair of CIISA Board

We are delighted to be unveiling the CIISA Standards, a framework that sets out the minimum standards of behaviour expected across the creative industries to ensure safe and inclusive working environments. The Standards have been crafted with great care and consideration through detailed and extensive collaboration with key bodies in the film, television, theatre and music sectors, including our wonderfully supportive Standards Advisory Committee.

Despite much work in this area, we know that bullying and harassment, including sexual harassment and behaviour of a discriminatory nature, remains prevalent in the creative industries. Power imbalances, informal working practices and environments, and job insecurity are all contributing factors. The particular impact on freelance and self-employed members of our creative industries workforce is especially acute so the need for CIISA is ever deeply felt.

So these Standards represent a landmark moment, to provide consistency and coherence to what can be a challenging environment to navigate in terms of what constitutes harmful behaviour within the creative industries and how this can be prevented and dealt with.

We hope the Standards will be an important point of reference for so many who find themselves reporting or receiving concerns without any consistent benchmark to refer to. We also will ensure that practical, tailored guidance with illustrative examples, which is the next step for the Standards, will support the application of the Standards in a very practical way.

I extend my personal gratitude to Niyi Akeju, CIISA's Head of Standards Development for her leadership in bringing this important work to fruition that we believe will bring great benefits to the creative industries in pursuit of a better fairer workplace culture.

I'd also like to thank our Standards Advisory Committee and the many other organisations and individuals who engaged so enthusiastically with the creation of these Standards, and all those who contributed to our consultation. This is very much a collaborative endeavour. CIISA has, and continues to, work with trade unions and industry bodies for example, to agree minimum standards of behaviour, and these Standards remain very much a living document that will be reviewed in future years to ensure they stay fit for purpose.

Our work continues with the progression and development of CIISA's other services alongside our work to embed these Standards across the whole of the creative industries' ecosystem, beginning initially with film, television, theatre and music. We will also be working with trailblazing organisations to help us with the practical application of the Standards.

By setting consistent Standards and by embedding and socialising them, CIISA is providing a positive stride forward in underpinning healthy working environments for the UK's creative industries, supporting them to grow and flourish.



Executive summary

The Creative Industries Independent Standards Authority (CIISA) was established to uphold and improve standards of behaviour across the creative industries, and to prevent and tackle all forms of bullying and harassment, including behaviour of a discriminatory nature.

The CIISA Standards were developed in collaboration with individuals and organisations across the creative industries. Providing a framework for a single, unified vision of professional standards of behaviour within the creative industries, they outline what a safe and inclusive working environment, that treats people with dignity, looks like, and are scalable to any size of organisation, production or project.

The Introduction sets out how individuals, organisations, productions and projects, and CIISA will use the Standards.

There are four Standards in total which are introduced with the following text:

1. **Safe Working Environments:**

Being subjected to behaviours such as harassment (sexual or otherwise), bullying, discrimination, victimisation and other forms of harmful behaviour and working practices has a detrimental effect on the wellbeing of individuals and can impact their performance and future progression, as well as their physical safety.

While some work might involve highpressure situations, everyone working in the creative industries must be able to do so in a professional environment, free from exposure to psychological, sexual and physical harm.

Employers, employees and self-employed people have duties under relevant legislation not to expose others in the workforce to risks to their physical and mental health or safety.

2. **Inclusive Working Environments:**

Everyone working in the creative industries has the right to be treated fairly and without prejudice at all stages of their career. Discriminatory behaviour can impact on the ability of individuals to secure work, thrive and progress in their role.

Active steps must therefore be put in place to prevent discrimination and exclusion, ensuring that roles and the working environment are genuinely accessible to all.

3. **Open and Accountable Reporting Mechanisms:**

Everyone working in the creative industries should feel confident that any concerns they raise will be taken seriously, looked at fairly and with empathy, and resolved at the earliest opportunity, regardless of whether the working relationship is ongoing or has ended.



They should know how to raise a concern, with the entity that contracted them in the first instance whenever possible, and be able to do this easily and without fear of being victimised, silenced or experiencing adverse outcomes for their career. A desire for anonymity by the person raising the concern should be respected.

4. **Responsive Learning Culture:**

A responsive learning culture enables the Creative Industries Workforce to see concerns raised as an opportunity not just to address harmful behaviour, but also to capture learning and to act on it, in order to continuously improve culture around such behaviour and the way concerns are handled.

The appendices provide examples of harmful behaviour applicable to the CIISA Standards and list relevant legislation, as well as the members of the Standards Advisory Committee which led on the development of the Standards.



Introduction to the CIISA Standards

What are the CIISA Standards?

The CIISA Standards ('the Standards') set out the minimum standards of behaviour expected across the UK's creative industries to enable safe and inclusive working environments, where individuals and their creative endeavours can thrive. This includes preventing and tackling of all forms of bullying and harassment, including behaviour of a discriminatory nature.

The Standards provide a framework for a single, unified vision of professional standards of behaviour within the creative industries. They aim to illustrate what a safe and inclusive working environment, that treats people with dignity, looks like, and are scalable to any size of organisation, production or project.

How were the CIISA Standards developed?

The CIISA Standards were developed in collaboration with individuals and organisations across the creative industries.

An eight-week consultation from 2nd December 2024 to 27th January 2025 resulted in engagement by more than 700 individuals and organisations, with almost 200 meaningful responses on the draft Standards.

Development was led by the CIISA Standards Advisory Committee (see Appendix III), which met between July and October 2024 to interrogate and shape the draft Standards, then met again in February 2025 to review and revise the Standards based on feedback from the consultation. The Standards Advisory Committee, which has no say in how CIISA operates, is made up of representatives working in film, television, music and theatre with experience of:

- developing standards and/or guidance on behalf of workers (particularly freelancers);
- supporting workers (particularly freelancers) with protected characteristics on discrimination in the workplace; and
- developing and delivering behavioural standards while working with an employer/hirer in an HR capacity.

In addition to meetings with organisations and special interest groups from May to November 2024, CIISA also held a series of workshops in October 2024 with organisations representing freelancers in film and television, music, and theatre respectively, to check the relevance and relatability of the Standards before launching the wider industry consultation.

The Standards have been developed with reference to existing legal requirements for individuals and organisations (see Appendix II: Sample list of legislation relevant to the CIISA Standards). The details given here are not designed to be exhaustive and should not be considered as legal advice.



How can individuals use the CIISA Standards?

Individuals can use the Standards to:

- Understand what types of behaviour can be harmful (see Appendix I: Examples of harmful behaviour applicable to the CIISA Standards).
- Understand the minimum standards of acceptable behaviour, above and beyond any legal obligations, for anyone engaged in work within the creative industries.
- Know what they should expect from themselves and each other, in terms of preventing and tackling harmful behaviour, including as bystanders who witness such behaviour.
- Check how their own experience relates to the CIISA Standards before raising a concern, in the first instance internally within their organisation, production or project where possible, using existing procedures.
- Where appropriate, approach CIISA (once its services become available) as an independent safe space where they can report experiences of harmful behaviour without fear of repercussions, knowing that their concerns will be taken seriously and they will receive help and support on next steps.

How can organisations, productions or projects use the CIISA Standards?

Organisations, productions and projects can assess their existing policies and procedures against, or create new ones aligned with, the CIISA Standards to ensure that they are embedding the right behaviours as part of, or alongside, existing policies and procedures, and that their workforce know what is expected of them. Through consistently meeting the Standards, organisations, productions and projects will ensure they are promoting the behaviours and culture that enable the people who work for them to thrive.

How will CIISA use the Standards?

CIISA will monitor how the creative industries are doing in terms of meeting the Standards, and will support organisations of any size, and individuals, to achieve them. We plan to do this in several ways:

- We will produce tailored, practical guidance on how organisations large and small, and individuals, can meet the Standards.
- Provide training on the Standards to help raise awareness, and support individuals and organisations to embed these expectations in their work.
- In time, CIISA will explore providing accreditation for key roles relevant to embedding safe and inclusive working environments.
- We will support organisations to self-assess their progress, ensuring that CIISA is capturing and sharing best practice on embedding safe and inclusive working environments for the benefit of all.



- CIISA will also provide an independent reporting mechanism for organisations and individuals to report concerns relevant to the Standards in confidence, and will signpost people to external resources that can help them find appropriate ways to address their concerns.
- CIISA will capture insight from these reports to help build up a cross-industry picture of how the creative industries are doing to embed the Standards. We will publish thematic insight reports and report on overall progress.
- In due course, CIISA will look to introduce services aimed at resolving concerns where possible, where no other existing routes are available. CIISA will make sure it does not duplicate existing routes to resolution.



How the Creative Industries Workforce should feel when the CIISA Standards are used in practice

- **Knowing the Standards** – “I have a clear understanding of what the CIISA Standards cover, and therefore what I should expect to see and experience, and the behaviour expected of me in the course of my work in the creative industries and in work-related environments.”
- **Recognising a breach** – “I know what a breach of the CIISA Standards looks like.”
- **Considering next steps** – “I know where to go to raise a concern, whether related to a current or previous role, on my own behalf or on behalf of someone else, and feel safe to speak up as I know my concern will be taken seriously, regardless of the perceived power of everyone involved, and I won’t be stigmatised for doing so.”
- **Raising a concern** – “I feel that the process of raising a concern is easily accessible.”
- **Staying informed** – “I feel listened to and that my concerns are being handled by individuals empowered to resolve them.”
- **Fair outcomes** – “I feel my raising a concern resulted in an outcome reached in a fair manner and appropriate action was taken.”
- **Reflecting on experience** – “I would feel empowered to raise a concern in the future and I would recommend others to do the same.”
- **Being the subject of a concern** – “If a concern is raised about my behaviour, I know that I will be treated in a way that is fair and appropriate, with due process that protects my rights.”



Key definitions used in the CIISA Standards

Bystander

A person who sees potentially harmful behaviour towards another person (or persons).

Concern

A complaint, grievance, expression of dissatisfaction or request for clarification in relation to a potential breach of the CIISA Standards, that requires a response.

Creative Industries Organisation/Production/Project

An organisation, production or project in the creative industries involved at any stage from creating to sharing creative content. The CIISA Standards are initially focused on organisations, productions and projects in film, television, music and theatre.

Creative Industries Workforce

Everyone who works in the creative industries (initially, for CIISA, in film, television, music and theatre) regardless of their role, seniority or employment status.

For the purposes of the CIISA Standards, the Creative Industries Workforce includes employees, self-employed people, freelancers, contractors, sub-contractors, suppliers, ancillary workers/support staff (such as waiting, catering or security staff in a creative industries working environment), board members, interns, apprentices, individuals on work experience and volunteers. Examples of employment status can be found at: www.gov.uk/employment-status

Other people, outside the Creative Industries Workforce, who could be impacted by the CIISA Standards, include donors, sponsors, investors, financiers, students on creative courses and members of the public.

Harmful behaviour

Harmful behaviour generally refers to actions or conduct carried out in a working environment that cause physical, emotional or psychological harm to others. This includes (but is not limited to) all forms of bullying, harassment, discrimination and victimisation.

For examples and definitions of harmful behaviour discussed in the Standards, see Appendix I.

Lead Performer/Contributor/Artist

Anyone in the Creative Industries Workforce with long-term or temporary creative leadership responsibilities or artistic authority for an organisation, production or project. In film and television they may be described (but not exclusively) as the on-screen talent or above-the-line contributor. In music they may be described (but not exclusively) as the releasing artist, band leader, musical director or lead writer or producer.



A Lead Performer/Contributor/Artist is part of the Creative Industries Workforce. They may also be Senior Leaders and/or Managers in the context of CIISA's definitions.

For the purposes of the CIISA Standards, lead performers/contributors/artists should refer to the position(s) most relevant to them (Creative Industries Workforce and Senior Leader and/or Manager).

Manager

In the context of the CIISA Standards, a Manager is anyone in the Creative Industries Workforce with responsibility for directly engaging and/or overseeing/supervising the work of others in an organisation, on a production or on a project, regardless of their level of seniority and whether or not they have 'line manager' in their job description.

Depending on the creative industry, job titles for Managers might include (but not exclusively) manager, producer, head of department, researcher (for example when managing runners), A&R, fixer or booker.

A Manager is part of the Creative Industries Workforce. They may also be a Senior Leader and/or Lead Performer/Contributor/Artist (see definitions above and below).

Protected characteristics

Nine personal characteristics are protected by UK law: age; gender reassignment; being married or in a civil partnership; being pregnant or on maternity leave; disability; race including colour, nationality, ethnic or national origin; religion or belief; sex; sexual orientation. Under the Equality Act 2010 it is against the law to discriminate against anyone because of their 'protected characteristics' (see Appendices I and II for more details).

Reasonable adjustments

Under the Equality Act 2010 'reasonable adjustments' are steps an employer should proactively take to remove, reduce or prevent obstacles to make sure people with disabilities, or physical or mental health conditions, are not substantially disadvantaged at work. Employers must make reasonable adjustments for employees, workers, contractors and self-employed people, as well as job applicants (see Appendices I and II for more details).

Senior Leader

In the context of the CIISA Standards, a Senior Leader is anyone in the Creative Industries Workforce with responsibility for the strategic leadership and direction of an organisation, production or project of any size.

Senior Leaders include individuals responsible for day-to-day operations, as well as board directors and trustees where they form part of the governance structure.

Senior Leaders are part of the Creative Industries Workforce. They may also be a Manager and/or a Lead Performer/Contributor/Artist (see definitions above).



Whistleblower

A worker who reports wrongdoing, usually at work, that affects others. Whistleblowers can raise concerns about an incident that happened in the past, is happening now, or they believe will happen in the near future. Whistleblowers are protected by law – they should not be treated unfairly or lose their job because they ‘blow the whistle’ (see legislation in Appendix II).

Working environment

Anywhere that activities related to work in the creative industries are taking place. Work-related activity includes (but is not limited to) the hiring process, rehearsals, production, performance, promotional activity, travel, networking, work-related social gatherings and industry events. The working environment may be a physical space, but may also be online, via social media or other platforms.

Geographically, for the purposes of the CIISA Standards, the working environment may be in the UK, or it may be overseas if the activity is in relation to a UK-based entity.



The CIISA Standards at a glance



Standard 1: Safe Working Environments

In the context of the CIISA Standards, a safe working environment is one where:

1. **Individuals in the Creative Industries Workforce** – regardless of their role, seniority or employment status – know what a safe working environment looks like and act accordingly. They understand the behaviours that are harmful and unacceptable in the working environment, including sexual misconduct and other forms of harassment and bullying, and ways in which to prevent them.
2. **Senior Leaders** set a culture where the welfare of the whole workforce, regardless of seniority or employment status, is protected and respected. They take measures to prevent harassment, including sexual harassment, bullying and other harmful behaviour, and to safeguard the wellbeing of their workforce.
3. **Managers** set the tone by promoting and embedding a culture where the welfare of the workforce is protected and respected.



Standard 2: Inclusive Working Environments

In the context of the CIISA Standards, an inclusive working environment is one where:

1. **Individuals in the Creative Industries Workforce** – regardless of their role, seniority or employment status – know what discriminatory behaviour, including harassment, looks like. They understand that this behaviour is not acceptable and act accordingly.
2. **Senior Leaders** promote a culture of inclusivity, treating people fairly and equitably, valuing everyone's differences, and empowering and enabling each member of their workforce to thrive, regardless of seniority or employment status. They take meaningful preventative measures to ensure that their workforce do not face discrimination or disadvantage in the working environment.
3. **Managers** set the tone by promoting and embedding a culture of inclusivity, treating people fairly, valuing everyone's differences, and empowering and enabling each member of their workforce to thrive.

Standard 3: Open & Accountable Reporting Mechanisms

Open and accountable reporting mechanisms are ones where:

1. **Individuals in the Creative Industries Workforce** – regardless of their role, seniority or employment status – know they have the right to report harmful behaviour, to the entity that contracted them in the first instance whenever possible, they know the procedures for doing so and are confident to use them.
2. **Senior Leaders** take responsibility for ensuring their workforce is empowered to raise concerns in a safe setting (and anonymised if requested by the person raising a concern) and know the process for doing so. They recognise their accountability as Senior Leaders and take ownership of addressing concerns and resolving them appropriately. Dealing early with misbehaviour can prevent escalation to even more serious issues.
3. **Managers** foster a culture of speaking up, where no-one is victimised, retaliated against, ostracised or belittled for asking questions, challenging the status quo or pursuing their rights or the rights of others.



Standard 4: Responsive Learning Culture

A responsive learning culture is one where:

1. **Individuals in the Creative Industries Workforce** – regardless of their role, seniority or employment status – are able to provide and receive feedback around their experience of harmful behaviour and, where appropriate, understand how their experiences may contribute to positive change in the future.
2. **Senior Leaders** embed a culture of continuous improvement and monitoring progress. They ensure that action is taken to learn from concerns raised, the impact of these concerns, how they were dealt with, and the impact of any actions taken to deal with them.
3. **Managers** take on board learnings and apply them to their work.

See next page for the CIISA Standards in full.



The CIISA Standards in full.

Note: For supporting information,
see these Appendices:

I. Examples of harmful behaviour
applicable to the CIISA Standards

II. Sample list of legislation relevant
to the CIISA Standards



Standard 1: Safe Working Environments

Being subjected to behaviours such as harassment (sexual or otherwise), bullying, discrimination, victimisation and other forms of harmful behaviour and working practices has a detrimental effect on the wellbeing of individuals and can impact their performance and future progression, as well as their physical safety.

While some work might involve high-pressure situations, everyone working in the creative industries must be able to do so in a professional environment, free from exposure to psychological, sexual and physical harm.

Employers, employees and self-employed people have duties under relevant legislation not to expose others in the workforce to risks to their physical and mental health or safety. For examples of duties, see the Equality Act 2010, Worker Protection Act 2023 and Health and Safety at Work Act 1974 (Appendix II).

In the context of the CIISA Standards, a safe working environment is one where:

1.1 Individuals in the Creative Industries Workforce – regardless of their role, seniority or employment status – know what a safe working environment looks like and act accordingly. They understand the behaviours that are harmful and unacceptable in the working environment, including all forms of sexual misconduct and other forms of harassment and bullying, and ways in which to prevent them. They recognise that:

- It is everyone’s responsibility to look out for the welfare of others in the workforce, to respect each other’s dignity regardless of seniority, and to challenge harmful behaviour where possible.
- They can expect action to be taken to address harassing behaviour, even if it is unintentional, and to ensure it is not repeated. This action could include informal training, disciplinary action or termination of services (depending on employment status), or potential legal action by the victim.
- They are able to seek support for their mental health and wellbeing if they are affected by harmful behaviour, and to receive support in addressing such behaviour.
- They must comply with relevant UK legislation and understand their duty of care under health and safety, employment and other legislation.

1.2 Senior Leaders set a culture where the welfare of the whole workforce, regardless of seniority or employment status, is protected and respected. They take measures to prevent harassment, including sexual harassment, bullying and other harmful behaviour, and to safeguard the wellbeing of their workforce. These measures include:

- Setting a good example by modelling the highest standards of behaviour.
- Ensuring Senior Leaders at the highest level take ultimate accountability for the welfare and behaviour of their workforce and prioritise risk mitigation in strategic planning.
- Taking responsibility to understand and mitigate risks to the welfare of the workforce and meet legal obligations, and regularly reviewing effectiveness of risk assessments.
- Clearly explaining to everyone they work with what harmful behaviour looks like, the consequences of such behaviour, and the expected standards of behaviour, as well as taking steps to inspire confidence in individuals to speak up where appropriate. This may be communicated through (but not exclusively) policies and procedures, contracts, service agreements, training and broader day-to-day engagement.
- Ensuring that individuals are not forced through legal mechanisms – such as the misuse of confidentiality clauses or non-disclosure agreements (NDAs) – to remain silent if they later experience or see harmful behaviour in their working environment.
- Prioritising the provision of training and resources to equip their workforce with the appropriate skills, competencies and means to support their own and others’ wellbeing. This includes training for Managers in people-management skills and how to address inadequate performance appropriately.



- Recruiting and recognising team members, Senior Leaders and Managers who promote and embed positive work cultures and display good people- management skills.
- Ensuring that their workforce has access (internally or through third parties) to individuals with enhanced responsibilities for supporting others, for example wellbeing facilitators, access co-ordinators, occupational health specialists and safeguarding and whistleblowing officers as appropriate. The access provided can be proportionate to the size of the organisation, production or project.

1.3 Managers set the tone by promoting and embedding a culture where the welfare of the workforce is protected and respected. They do this by:

- Setting a good example by modelling the highest standards of behaviour, and are as transparent as possible in their dealings with their team.
- Developing their knowledge around recognising and addressing harmful behaviours, where it may be lacking.
- Taking responsibility for the behaviour of others in their team.
- Proactively supporting individuals with enhanced responsibilities for supporting others (where applicable) – such as wellbeing facilitators, access co-ordinators, occupational health specialists and safeguarding and whistleblowing officers – to meet the responsibilities that come with the enhanced role.





Standard 2: Inclusive Working Environments

Everyone working in the creative industries has the right to be treated fairly and without prejudice at all stages of their career. Discriminatory behaviour can impact on the ability of individuals to secure work, thrive and progress in their role.

Active steps must therefore be put in place to prevent discrimination and exclusion, ensuring that roles and the working environment are genuinely accessible to all.

For examples of duties, including the duty to make 'reasonable adjustments' to help disabled employees and job applicants, see the Equality Act 2010 (Appendix II).

In the context of the CIISA Standards, an inclusive working environment is one where:

2.1 Individuals in the Creative Industries Workforce – regardless of their role, seniority or employment status – know what discriminatory behaviour, including harassment, looks like. They understand that this behaviour is not acceptable and act accordingly. They recognise that:

- It is everyone’s responsibility within the workforce to prevent the discrimination of others, to promote inclusivity and to be open to learning and changing their own behaviour if necessary.
- Regardless of personal beliefs, they must treat everyone they work with in a professional, respectful manner, and can expect others to treat them in the same way.
- They can expect action to be taken to address discriminatory behaviour, even if it is unintentional, and to ensure it is not repeated. This action could include informal training, disciplinary action or termination of services (depending on employment status), or potential legal action by the victim.
- They are able to seek support for their mental health and wellbeing if they are affected by discriminatory behaviour, and to receive support in addressing such behaviour.
- Each person is an individual with specific concerns and experiences, and discriminatory conduct and other unfair treatment is not always attributable to a single, easily identifiable characteristic.
- The targeted characteristic(s) may not always meet the ‘protected characteristic’ definition in UK law – for example socio-economic background, accent or class – but action should still be taken to address harmful behaviour based on these characteristics.

2.2 Senior Leaders promote a culture of inclusivity, treating people fairly and equitably, valuing everyone’s differences, and empowering and enabling each member of their workforce to thrive, regardless of seniority or employment status. They take meaningful preventative measures to ensure that their workforce do not face discrimination or disadvantage in the working environment. These measures include:

- Setting a good example by modelling the highest standards of behaviour.
- Clearly explaining to everyone they work with what discriminatory behaviour, including harassment, looks like and the consequences of such behaviour. This may be communicated through (but not exclusively) policies and procedures, contracts, service agreements, training and broader day-to-day engagement designed to avoid, reduce and mitigate against discrimination and any harmful conduct that may impact on members of the workforce.
- Prioritising the provision of training and resources to equip themselves and their workforce with the appropriate skills, competencies and means to support an inclusive working environment.
- Taking proactive steps to mitigate power imbalances, tackle abuses of power and address any structural barriers to inclusion.
- Ensuring they regularly review and meet the accessibility requirements of their workforce,



including recognising and implementing the social model of disability (which seeks to remove barriers that prevent disabled people from participating in the workforce), and making reasonable adjustments as required under the Equality Act 2010.

- Ensuring that their workforce has access (internally or through third parties) to individuals with enhanced responsibilities for supporting others with access requirements, for example occupational health specialists and access co-ordinators (where applicable).

2.3 Managers set the tone by promoting and embedding a culture of inclusivity, treating people fairly, valuing everyone's differences, and empowering and enabling each member of their workforce to thrive. They do this by:

- Setting a good example by modelling the highest standards of behaviour.
- Developing their knowledge of recognising and addressing discriminatory behaviour, where it may be lacking.
- Taking responsibility for the behaviour of others in their team.
- Supporting the implementation of any accessibility requirements for their team, including reasonable adjustments as required under the Equality Act 2010, and any enhanced regulations under devolved nations.
- Proactively supporting individuals with enhanced responsibilities for supporting access requirements – such as occupational health specialists and access co-ordinators (where applicable) – to meet the responsibilities that come with the enhanced role.





Standard 3: Open and Accountable Reporting Mechanisms

Everyone working in the creative industries should feel confident that any concerns they raise will be taken seriously, looked at fairly and with empathy, and resolved at the earliest opportunity, regardless of whether the working relationship is ongoing or has ended.

They should know how to raise a concern, with the entity that contracted them in the first instance whenever possible, and be able to do this easily and without fear of being victimised, silenced or experiencing adverse outcomes for their career. A desire for anonymity by the person raising the concern should be respected.

Open and accountable reporting mechanisms are ones where:

3.1 Individuals in the Creative Industries Workforce – regardless of their role, seniority or employment status – know they have the right to report harmful behaviour, to the entity that contracted them in the first instance whenever possible; they know the procedures for doing so, and are confident to use them. They recognise that:

- It is everyone’s responsibility to raise concerns, through appropriate channels, about harmful behaviour in the working environment.
- They have a right to raise questions and report concerns about past or current harmful behaviour through a variety of safe and structured mechanisms that include protections from retaliation/victimisation and forced confidentiality.
- They should not be forced to agree to confidentiality clauses, such as non-disclosure agreements (NDAs), that could deter or prevent them from reporting harmful behaviour or seeking appropriate support.
- Keeping detailed records of harmful behaviour will support a formal report of a concern and will help Senior Leaders to take action.
- They should receive a timely response that explains what possible actions and outcomes they can expect from the entity to which they may raise concerns, and what is outside the scope of that entity.

3.2 Senior Leaders take responsibility for ensuring their workforce is empowered to raise concerns in a safe setting (and anonymised if requested by the person raising a concern) and know the process for doing so. They recognise their accountability as Senior Leaders, and take ownership of addressing concerns and resolving them appropriately. Dealing early with misbehaviour can prevent escalation to even more serious issues. Senior Leaders achieve this by:

- Providing a variety of well-publicised ways to raise a concern that are easy to navigate and include options for anonymised reporting.
- Having clear mechanisms for preventing retaliation/victimisation for reporting or whistleblowing, that are outlined in policies that describe what action will be taken if retaliation/victimisation occurs.
- Ensuring that confidentiality clauses are not misused to silence individuals who want to report harmful behaviour or misconduct, or used as part of settlement agreements in a way that prevents individuals from whistleblowing, reporting crimes to police or discussing incidents of harassment, bullying or discrimination with others.
- Having a set policy or process for what to do if a concern is raised about a client or other third party that everyone is aware of.
- Making clear what is within the organisation/production/project’s remit to resolve, and signposting where to raise the concern if it is not in their remit.
- Encouraging individuals to raise concerns as soon as possible after a potential incident of harmful behaviour has occurred, and addressing concerns raised by individuals after their contract has ended.



- Recognising that harmful behaviour may be experienced by multiple people in the same workplace and their concerns may be raised individually, collectively or through a representative.
- Providing two-way communication channels to ensure that anyone who raises a concern, and other individuals directly involved, can have their say and are kept updated (subject to data protection requirements) on how the concern is being addressed, if they wish to be and where sufficient information has been provided. Impacted individuals can see that the concern is being looked into in a fair and objective way, based on the facts.
- Ensuring that all parties connected to a concern are provided with appropriate support during the process.
- Equipping Managers to be able to respond to a concern appropriately.
- Having clear and fair decision-making through implementing rigorous procedures and taking swift, clear and appropriate action to address any issues or concerns raised. Senior Leaders give an open and honest response as quickly as possible, considering the complexity of the concerns, that:
 - a) sets out what happened and whether a breach of behavioural standards took place;
 - b) fairly reflects the experiences of everyone involved;
 - c) clearly sets out how the organisation/production/project is accountable;
 - d) empowers individuals addressing concerns to offer fair remedies; and
 - e) outlines any action to be taken to make sure any learning is used to improve behaviours and future responses.

3.3 Managers foster a culture of speaking up, where no-one is victimised, retaliated against, ostracised or belittled for asking questions, challenging the status quo or pursuing their rights or the rights of others. They do this by:

- Welcoming concerns in a positive way, being open to questions about what is harmful behaviour.
- Ensuring their team are aware of how they can report a concern.
- Listening to anyone who raises a concern, acknowledging their concerns and desired outcome, and acting to support the reporting process.
- Taking responsibility to report any activity that is potentially illegal to an appropriate person within the organisation/production/project, and to any relevant outside authority, and supporting the impacted individuals throughout this process, including ensuring their permission to report where appropriate.





Standard 4: Responsive Learning Culture

A responsive learning culture enables the Creative Industries Workforce to see concerns raised as an opportunity not just to address harmful behaviour, but also to capture learning and to act on it, in order to continuously improve culture around such behaviour and the way concerns are handled.

A responsive learning culture is one where:

4.1 Individuals in the Creative Industries Workforce – regardless of their role, seniority or employment status – are able to provide and receive feedback around their experience of harmful behaviour and, where appropriate, understand how their experiences may contribute to positive change in the future. They do this by:

- Engaging with opportunities to reflect on their experience of being involved in a concern (whether as someone who has experienced, witnessed, perpetrated or been accused of harmful behaviour) and any feedback they have received.
- Having the option to share their individual perspective and learnings in appropriate forums, without being restricted by the misuse of confidentiality clauses.
- Recognising the importance of reporting issues even after they have moved on from that organisation/production/project (ideally as soon as possible), so that issues are addressed and others can learn from the experience.
- Engaging with opportunities to provide feedback on positive experiences of working environments, to help reinforce good practice.

4.2 Senior Leaders embed a culture of continuous improvement and monitoring progress. They ensure that action is taken to learn from concerns raised, the impact of these concerns, how they were dealt with, and the impact of any actions taken to deal with them. They can do this by:

- Regularly checking in and gathering feedback – both positive and negative – on the experience of everyone they are working with, as well as those who proactively raise a concern.
- Keeping centralised, confidential records, and monitoring the types of concerns raised, both formal and informal. Senior Leaders use this information to note trends, identify areas to address, and to take appropriate action.
- Reviewing and revising policies and practices, including the use of confidentiality clauses, to ensure they do not inhibit individuals' ability to contribute to collective learning.
- Ensuring Senior Leaders at the highest level and across the organisation/production/project have regular oversight of feedback, whether from historical or current incidents, and ensure that action is taken to implement learning, monitoring improvements and assessing the impact of any action taken.
- Embracing opportunities to improve, fostering a culture where everyone is supported and empowered to act on learning. They set clear expectations for openness to learning from concerns raised.
- Supporting individuals who are responsible for gathering and acting on feedback, ensuring they are well resourced.
- Fostering trust that feedback will lead to meaningful positive change by regularly talking to their workforce, Managers, other Senior Leaders (including from other creative industries and CIISA where appropriate) about what the organisation/production/project has learnt from



feedback received about concerns raised, and how it has used this learning to improve its responses and implement any revised policies and procedures.

- Seeking advice when providing references for individuals whose behaviour may indicate future safeguarding risks.

4.3 Managers take on board learnings and apply them to their work. They do this by:

- Creating an environment where team members can safely give feedback and share their perspectives on any concerns that have impacted them.
- Reviewing team practices to identify and eliminate potential barriers to openness that may restrict transparency or learning.
- Taking responsibility for addressing any gaps in their own knowledge or experience that might be indicated by feedback, proactively seeking out and taking up learning opportunities.



Appendix I – Examples of harmful behaviour applicable to the CIISA Standards

Notes:

- The examples and definitions used in the CIISA Standards draw from UK legislation and recognised bodies. The details given here are not designed to be exhaustive.
- While statutory definitions are a useful reference point, the CIISA Standards are not limited to behaviours that fall within legislation.
- Northern Ireland does not have a single Equality Act, but has a collection of legislation that covers the relevant themes and issues. You can find more information about what equality legislation is in place in Northern Ireland on the Equality Commission Northern Ireland's website: www.equalityni.org/legislation

Bullying

There is no legal definition of bullying, but Acas (the Advisory, Conciliation and Arbitration Service)¹ gives the following description:

Bullying can be described as unwanted behaviour from a person or group that is either:

- offensive, intimidating, malicious or insulting; or
- an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.

Bullying might:

- be a regular pattern of behaviour or a one-off incident;
- happen face to face, online, on social media, in emails or letters, or on phone calls;
- happen at work or in other work-related situations;
- not always be obvious or noticed by others.

It is possible someone might not know their behaviour is bullying. It can still be bullying even if they do not realise it or do not intend to bully someone. Acas notes examples of bullying at work could include:

1 www.acas.org.uk/bullying-at-work



- constantly criticising someone's work;
- spreading malicious rumours about someone;
- constantly putting someone down;
- deliberately giving someone a heavier workload than everyone else;
- excluding someone from team social events;
- putting humiliating, offensive or threatening comments or photos on social media.

Other examples include threatening to withhold pay or block access to future work in the industry.

Acas notes that bullying can also happen towards someone more senior, for example a manager. This is sometimes called 'upward bullying' or 'subordinate bullying'.

Bullying itself is not against the law, but employers have a legal duty of care to protect their employees from harm. This includes dealing with bullying issues.

Discrimination

Under UK law,² discrimination can come in one of the following forms:

- **Direct discrimination** – Treating someone with a protected characteristic less favourably than others because of the protected characteristic.
- **Indirect discrimination** – Putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage.
- **Harassment** – Unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them (see 'Harassment' below).
- **Victimisation** – Treating someone badly because they have complained about discrimination or harassment (see 'Victimisation' below).

The law protects individuals against discrimination at work,³ including: dismissal; employment terms and conditions; pay and benefits; promotion and transfer opportunities; training; recruitment; and redundancy.

Under the Equality Act 2010, employers should also make 'reasonable adjustments' to help disabled employees and job applicants who might otherwise face discrimination on the grounds of disability.

2 www.gov.uk/discrimination-your-rights/how-you-can-be-discriminated-against#:~:text=direct%20discrimination%20%2D%20treating%20someone%20with,characteristic%20at%20an%20unfair%20disadvantage

3 www.gov.uk/discrimination-your-rights/discrimination-at-work



Gaslighting

The National Bullying Helpline⁴ describes gaslighting as:

A subtle and extremely common form of bullying within the work environment. It is a manipulative power game with deliberate intent to control an individual or control a situation. Employees (and others in the workforce) subject to gaslighting find themselves second-guessing their every decision and questioning their own sanity, making them more dependent on their abuser.

Examples of gaslighting include:

- a lack of openness and transparency;
- drip-feeding information or failing to provide full facts;
- moving goal posts or changing elements of a job description without first engaging in discussion;
- refusal to follow policies unless it suits the business. For example, reluctance to acknowledge a verbal complaint or investigate a formal grievance but at the same time applying a forceful approach to performance management and disciplinary policies.

Gaslighting may also include denying having said or done something that was in fact previously said or done, and questioning someone's memory of what actually happened.

Harassment

In discrimination law (Equality Act 2010) there are three types of harassment:

- harassment related to certain 'protected characteristics';
- sexual harassment;
- less favourable treatment as a result of harassment.

Acas⁵ notes that harassment and bullying are often confused. Bullying behaviour can be harassment if it meets the definitions below in this section.

It is possible that serious harassment could also be a hate crime.

Harassment related to a protected characteristic is unwanted behaviour related to any of the following protected characteristics: age; disability; gender reassignment; race; religion or belief; sex; and sexual orientation. To be harassment, the unwanted behaviour must have either:

- violated the person's dignity; or
- created an intimidating, hostile, degrading, humiliating or offensive environment for the person.

4 www.nationalbullyinghelpline.co.uk/

5 <https://www.acas.org.uk/discrimination-and-the-law/harassment>



It can be harassment if the behaviour:

- has one of these effects even it was not intended; or
- intended to have one of these effects even if it did not have that effect.

Unwanted behaviour can include:

- a serious one-off incident;
- repeated behaviour;
- spoken or written words, imagery, graffiti, gestures, mimicry, jokes, pranks, physical behaviour that affects the person.

The law on harassment related to a protected characteristic applies when someone:

- has a relevant protected characteristic;
- is harassed because they are thought to have a certain protected characteristic when they do not;
- is harassed because they have a connection with someone with a certain protected characteristic; or
- witnesses harassment, if what they have seen has violated their dignity or created an intimidating, hostile, degrading, humiliating or offensive working environment for them.

Sexual harassment is unwanted behaviour of a sexual nature. It does not need to be related to a protected characteristic. For example, someone who thinks they have been sexually harassed does not need to show it was because of their sex or sexual orientation. To be sexual harassment, the unwanted behaviour must have either:

- violated someone's dignity, whether it was intended or not; or
- created an intimidating, hostile, degrading, humiliating or offensive environment for them, whether it was intended or not.

By law, employers must take reasonable steps to prevent sexual harassment of staff in the course of their employment. This includes taking reasonable steps to prevent sexual harassment of staff by third parties. 'Staff' covers employees and workers, contractors and self-employed people hired to personally do the work, and job applicants.

Less favourable treatment as a result of harassment is when someone experiences less favourable treatment because of how they responded to previous harassment. It can apply whether the person rejected or 'submitted to' (accepted) the previous harassment. Note: this type of harassment can only be the case where the previous harassment in question related to sexual harassment or harassment related to gender reassignment or sex.

Other kinds of harassment: Under the Protection from Harassment Act 1997 there is a type of harassment that is separate from the three types of harassment under the Equality Act 2010. This is behaviour that causes alarm or distress but is not necessarily related to a protected characteristic. It includes stalking. It can be a criminal act.



Microaggression

Defined by Acas⁶ as small comments, questions or behaviours that are inappropriate or can cause offence, sometimes without the person who is doing it realising.

Microaggression can also be described as subtle, often unintentional, behaviour that conveys a negative or prejudiced attitude towards individuals or groups based on a specific characteristic (or characteristics).

Examples include:

- Asking someone ‘Where are you really from?’ based on how they look or speak, even after they say they are from the UK (for example).
- Telling someone their name is ‘exotic’ or too hard to say – this implies it is not worth taking the time to learn their name and suggests they do not fit in.
- Reinforcing prejudicial attitudes based on gender or race (for example, asking a woman at work, ‘Who is at home looking after your children?’).
- Saying to a person with a disability, ‘You don’t look disabled’ which can invalidate their experiences or challenges.
- Not recognising an individual’s skills or experience based on a prejudice (for example, a male in a technical role ignoring or dismissing the advice or input of a female working in the same role who has the same skills and experience).

Victimisation

Under the Equality Act 2010⁷ victimisation takes place when one person treats another badly because he or she in good faith has done a ‘protected act’.

A protected act refers to specific actions taken by an individual that are safeguarded under the Equality Act, for example:

- making a complaint about discrimination or harassment;
- supporting someone else’s complaint about discrimination or harassment;
- providing evidence or information in relation to a relevant complaint about discrimination or harassment (or acting as a witness).

The Equality Act also provides that victimisation takes place when one person treats another badly because he or she is suspected of having done this or of intending to do this. Relevant examples of retaliations that would fall under this definition include threatening to withhold pay or to block access to future work.

6 www.acas.org.uk/race-discrimination/types-of-race-discrimination#:~:text=Direct%20%E2%80%80race%20discrimination%E2%80%81%20is%20when%20someone

7 www.legislation.gov.uk/ukpga/2010/15/notes/division/3/2/2/15



Appendix II: Sample list of legislation relevant to the CIISA Standards

Notes:

- The list below is a sample of UK legislation relevant to the CIISA Standards. While legislation is a useful reference point, the CIISA Standards are not limited to behaviours that fall within legislation.
- Northern Ireland does not have a single Equality Act, but has a collection of legislation that covers the relevant themes and issues. You can find more information about what equality legislation is in place in Northern Ireland, by visiting the Equality Commission Northern Ireland's website: <https://www.equalityni.org/legislation>
- As there is no single legal definition of bullying, the list below refers to legislation that broadly touches on relevant aspects or behaviours linked to bullying.

Bullying, Harassment, Discrimination and Victimisation

- **Criminal Justice and Public Order Act 1994** – This Act sets out the criminal offence of causing intentional harassment, alarm or distress. This can include using threatening, abusive or insulting words or behaviour.
- **Employment Rights Act 1996** – This Act set out the rights of employees in situations such as dismissal, unfair dismissal, parental leave and redundancy, and protection from discrimination and harassment at work.
- **Equality Act 2010** – This Act legally protects people from discrimination in the workplace and in wider society.
- **Health and Safety at Work Act 1974** – Employers have a duty of care to ensure the health, safety and welfare of employees and provide a safe working environment. This includes providing protection from bullying and harassment at work.
- **Human Rights Act 1998** – Article 3 covers the concept of the prohibition of (in other words, not allowing) inhuman or degrading treatment. Severe cases of bullying or harassment could potentially fall under this if it causes significant harm.
- **Management of Health and Safety at Work Regulations 1999** – These Regulations provide more guidelines for how employers are expected to assess and manage risks to health, safety and welfare of workers, which can include protection against bullying and harassment.
- **Protection from Harassment Act 1997** – This Act protects individuals from suffering harassment, including protections for employees against harassment and bullying in the workplace.



- **Public Interest Disclosure Act 1998** – This Act is designed to protect whistleblowers from detrimental treatment by their employers (victimisation) if the disclosure is in the public interest. This can potentially relate to an employee raising a concern about an organisation’s culture (for example the organisation allows bullying or harassment of its workers to go unchecked).
- **Public Order Act 1986** – Like the Criminal Justice and Public Order Act 1994, the 1986 Public Order Act makes it an offence to use threatening, abusive or insulting words or behaviour with the intent to cause harassment, alarm or distress.
- **Worker Protection Act (Amendment of Equality Act 2010) 2023** – This Act places a duty on employers to take ‘reasonable steps’ to prevent sexual harassment, including by third parties, and comes with updated technical guidance from the Equality and Human Rights Commission (EHRC) in this area.

Other relevant legislation:

- **Carer’s Leave Act 2023** – The Act provides legal protections for carers from unfair treatment when taking Carer’s Leave. This ensures they can take leave without fear of retaliation.
- **Carer’s Leave Regulations 2024** – These Regulations set out more detailed guidance for employers regarding how to protect carers in their organisation from unfair treatment.
- **Communications Act 2003** – This Act makes it an offence to send, by public electronic communications, a message or other matter that is grossly offensive, indecent, obscene or menacing. It also covers sending false information with the intent to cause annoyance, inconvenience or anxiety. This can be relevant to online harassment.
- **Conduct of Employment Agencies and Employment Businesses Regulations 2003 (as amended) (the Conduct Regulations)** – These Regulations set out general obligations on employment agencies and businesses to act ethically and responsibly, ensuring work-seekers are treated fairly and with respect.
- **Crime and Disorder Act 1998** – This Act created specific offences for racially or religiously aggravated harassment, alarm or distress, meaning that bullying or harassment motivated by racial or religious prejudice can result in more severe penalties.
- **Criminal Justice (No. 2) (Northern Ireland) Order 2004** – This Order includes provisions against inciting hatred or arousing fear on grounds of sexual orientation or disability in Northern Ireland.
- **Criminal Justice Act 2003** – This Act introduced provisions regarding hate crimes, which can encompass bullying and harassment based on race, religion, sexual orientation or disability.
- **Data Protection Act 2018** – This Act seeks to empower individuals to take control of their personal data and to support organisations with their lawful processing of personal data.
- **Employment Agencies Act 1973** – This is an Act to regulate employment agencies and businesses; and for connected purposes.
- **Hate Crime and Public Order (Scotland) Act 2021** – This Act introduced greater protections in Scotland regarding hate crimes. This included a new offence for ‘stirring up hatred’, and specific provisions for racially aggravated harassment.



- **Malicious Communications Act 1988** – The precursor to the Communications Act 2003, making it an offence to send letters (as well as electronic communications) or other articles with the intent to cause distress or anxiety.
- **Victims and Prisoners Act 2024** – This Act makes provisions about victims of criminal conduct and others affected by criminal conduct.
- **Working Time Regulations 1998** – These Regulations govern working hours in the UK.



Appendix III: CIISA Standards Advisory Committee

CIISA is grateful for the support of the Standards Advisory Committee in the development of the CIISA Standards.

The organisations represented on the Committee are:

- Association of British Orchestras
- Attitude is Everything
- BAFTA
- BBC
- Bectu
- Black Lives in Music
- CIISA (Chair)
- The Film and TV Charity
- Freelancers Make Theatre Work
- Help Musicians
- ITV
- Musicians' Union
- National Theatre
- Pact
- The Production Guild of Great Britain
- Royal Exchange Theatre
- Royal Shakespeare Company
- Sony Music
- TV Industry Human Rights Forum
- Warner Bros Discovery

We would also like to thank the many other individuals and organisations, including CIISA's Co-Creation Council, who contributed to the development of these Standards, and everyone who submitted a response to the consultation.



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