Consultation report: You said, we did

Summary of CIISA Standards consultation feedback and how we used it.

CIISA

The Creative Industries
Independent Standards Authority

Independent. Without fear or favour.

Introduction

CIISA carried out an eight-week industry consultation on the CIISA Standards between 2nd December 2024 and 27th January 2025.

During the consultation period, we:

- Conducted an online survey (the Consultation Response Form)
- Hosted three open access webinars for the theatre, music, and film and television professionals respectively
- Hosted separate webinars for members of trade bodies and unions.
- Briefed individual organisations and productions.

The consultation resulted in engagement from over 700 individuals and organisations, with almost 200 meaningful responses on the draft Standards.

This summary captures key feedback on the Standards document, including the introduction, the four Standards and core expectations, and the appendices. It includes feedback given both inside and outside of the main online survey.

Some of the more detailed comments, which are beyond the scope of the high-level Standards framework, will be included in future tailored, practical guidance.

The published Standards are available to download at www.ciisa.org.uk/standards/.

Headline Data:

- 708 individual engagements with the consultation (696 online survey repondents plus 12 responses submitted via email).
- 193 meaningful responses to the consultation (1181 online survey repondents plus 12 responses submitted via email).
- Of the 181 online survey respondents:
    - 67% were self-employed or contract workers
    - 26% responded on behalf of an organisation
    - 67% work in film
    - 65% work in television
    - 24% work in music
    - 61% work in theatre
    - On average, 80% of respondents felt that the expectations in the Standards were clear.[1]
    - 76% could see how the CIISA Standards were relevant to them and their experience working in the creative industries.
    - 57% felt that the CIISA Standards were sufficiently clear for them to use in practice.

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1 'clear' = 'very clear' plus 'somewhat clear' scores

Key Quotes:

Individuals

- "I think this is a great starting point for new projects, just like knowing you're working on an Albert Sustainable Production before arriving on set gives you an idea of what to expect." – **Costume consultant and puppet maker**

- "I have found these definitions [of harmful behaviour] hugely helpful and have looked back at so much of my own lived experience with a different gaze … Thank you for putting it into words" – **Lighting designer**

- "I believe the Standards will go a long way to dealing with many obvious concerns, but there will always be subjectivity and context in knowing what a breach looks like." – **Self-employed actor**

Organisations

- "The Standards are clear, succinct and written in an accessible language, which we feel is essential [to] ensure that the Standards are widely understood." – **Funding body**

- "The standards are rigorous but prevention depends on those who need to engage most acknowledging and adopting the standards." – **Trade union**

- "Given an effective execution, the CIISA standards have the potential to deliver on their aspirations and bring about meaningful change." – **Funding body**

- "The devil is going to be in the rolling out and implementation and consistent communication. I do think they're brilliant and want to thank everyone for their hard work and careful consideration of all the issues and scenarios." – **Membership body**

You said, we did:

Section/Subject	You said	We did
Introduction to the Standards		
What are the CIISA Standards? 74% of survey respondents found this description clear.	• Be clearer on CIISA's role in relation to harassment and discriminatory behaviour.	• Changed language in all CIISA comms to clarify that CIISA's role includes "preventing and tackling of all forms of bullying and harassment, including behaviour of a discriminatory nature".
How were the CIISA Standards developed? 69% of survey respondents found this description clear.	• Explain the role of CIISA's Standards Advisory Committee with regards to CIISA's independence.	• Clarified that the Standards Advisory Committee has no say in how CIISA operates.
	• Add more references to legal duties.	• Noted that the details given are not designed to be exhaustive and should not be considered as legal advice.
How will CIISA use the Standards? 64% of survey respondents found this description clear.	• Explain CIISA's role in monitoring and enforcing the Standards.	• Moved this question to the end of the section to reduce the emphasis on CIISA's own services at this stage. • Added a Foreword that highlights industry's important role in upholding the Standards.
	• Explain how smaller organisations will be supported to meet the Standards.	• Provided more details of CIISA's planned support services.
How can individuals use the CIISA Standards? 60% of survey respondents found this description clear.	• Make clear that concerns should be raised internally in the first instance, whenever possible.	• Clarified that concerns should be raised with the hiring entity in the first instance if possible.

Section/Subject	You said	We did
How can organisations, productions or projects use the CIISA Standards? 64% of survey respondents found this description clear.	• Explain how the Standards interact with an organisation's existing policies and practices.	• Noted that the CIISA Standards can be embedded as part of, or alongside, existing policies and procedures.

How the creative industries workforce will feel when the Standards are used in practice

How confident do you feel that the CIISA Standards can deliver on the statements? 53% were fairly, mostly or very confident that CIISA can deliver on the statements listed.	• Recognise that 'how people will feel' is subjective and hard to measure.	• Changed wording in heading from 'will feel' to 'should feel'.
	• Acknowledge that some individuals may hold particular power with regard to the success of an organisation, production of project.	• Added text to 'Considering next steps' bullet to acknowledge potential power imbalances.

Key definitions used in the Standards

On average, 75% of respondents found the definitions clear.	• Make some of the definitions easier to understand.	• Amended the definitions to make them clearer. • Capitalised the job role names (Creative Industries Workforce, Senior Leader, etc) and prefaced them with 'in the context of the CIISA Standards'.

Section/Subject	You said	We did
	• Make 'Creative/Artistic Leader' more identifiable.	• Renamed 'Creative/Artistic Leader' to 'Lead Performer/Contributor/Artist' and amended the examples of potential job titles.
	• Clarify who is in the creative industries workforce.	• Amended the 'Creative Industries Workforce' text and included additional examples of potential jobs. • Added a note that Senior Leaders and Managers, as well as Lead Performer/Contributor/Artists, are all part of the Creative Industries Workforce.
	• Include definitions of the harmful behaviours listed in the appendices.	• Added a definition for 'harmful behaviour' and signposted to more detail in the appendices.
	• Explain 'whistleblower' and 'reasonable adjustments'	• Added definitions for 'whistleblower' and 'reasonable adjustments'.

Standard 1 – Safe Working Environments

Introductory text On average, 80% of survey respondents found the expectations in 'Standard 1 – Safe Working Environments' clear.	• Add summaries of key legal duties in the introductory text.	• Referenced key legal duties and signposted to legislation in the appendices.
1.1 - Creative Industries Workforce 82% of survey respondents found these expectations clear.	• Clarify potential action that might be taken against harmful behaviour.	• Added examples such as informal training and disciplinary action and clarified potential legal action.

Section/Subject	You said	We did
	• Manage the expectations of the kind of support for mental health and wellbeing that smaller entities are able to offer inhouse.	• Changed references to 'entitled to' to 'able to seek' support.
1.2 - Senior Leaders 81% of survey respondents found these expectations clear.	• Acknowledge the misuse of confidentially clauses to pre-empt speaking up about future harmful behaviour.	• Added bullet about not misusing pre-emptive confidentiality clauses.
	• Recognise that smaller entities might have limited resources to provide specialist support for their workers.	• Amended final bullet to make clear that specialist support can be external and proportionate to the size of the entity.
1.3 – Managers 77% of survey respondents found these expectations clear.	• Explain how Managers can achieve 'the highest standards of behaviour'.	• Added a bullet about the expectation for Managers to develop their own knowledge where it may be lacking.

Standard 2 – Inclusive Working Environments

Section/Subject	You said	We did
Introductory text On average, 81% of survey respondents found the expectations in 'Standard 2 – Inclusive Working Environment' clear.	• Be more explicit about the duty to provide reasonable adjustments for disabled workers.	• Referenced the duty to provide reasonable adjustments and signposted the legislation in the appendices.
2.1 - Creative Industries Workforce 83% of survey respondents found these expectations clear.	• Address conflicting personal beliefs.	• Added a bullet about the need to treat everyone in a professional, respectful manner.
	• Make the distinction between unlawful and criminal behaviour and potential sanctions.	• Clarified potential legal action and added examples such as informal training and disciplinary action.

Section/Subject	You said	We did
	• Manage the expectations of the kind of support for mental health and wellbeing that smaller entities are able to offer inhouse.	• Changed references to 'entitled to' to 'able to seek' support.
2.2 - Senior Leaders 81% of survey respondents found these expectations clear.	• Look at Senior Leaders' responsibility to address power imbalances and structural barriers to inclusion.	• Bullet added on power imbalances, abuses of power and structural barriers to inclusion.
	• Recognise that smaller entities might have limited resources to provide specialist support for their workers.	• Final bullet amended to acknowledge that specialist support may be through external sources.
2.3 – Managers 80% of survey respondents found these expectations clear.	• Explain how Managers can achieve 'the highest standards of behaviour'.	• Added a bullet about the expectation for Managers to develop their own knowledge where it may be lacking.

Standard 3 – Open and Accountable Reporting Mechanisms

Introductory text On average, 81% of survey respondents found the expectations in 'Standard 3 – Open and Accountable reporting Mechanisms' clear.	• Make clear that concerns should be raised internally in the first instance, whenever possible.	• Copy amended to make clear concerns should be raised with the hiring entity in the first instance if possible.
3.1 - Creative Industries Workforce 82% of survey respondents found these expectations clear.	• Clarify that 'calling out' harmful behaviour is one of several active bystander techniques and depends on the situation.	• Changed 'call out' changed to 'raise concerns through appropriate channels.'
	• Make clear that past behaviour can be reported.	• Text amended to include past behaviour.

Section/Subject	You said	We did
	• Ensure people aren't forced to agree to confidentiality clauses, such as NDAs, that prevent them from speaking up about a concern.	• Bullet added on not misusing confidentiality clauses.
	• Note the importance of keeping records to support concerns being looked into.	• Bullet added on keeping detailed records of harmful behaviour.
3.2 - Senior Leaders 81% of survey respondents found these expectations clear.	• Add a requirement to have mechanisms for preventing retaliation/victimisation for reporting or whistleblowing.	• Added an expectation to have mechanisms for preventing retaliation/victimisation
	• Ensure that that NDAs aren't misused to prevent people from reporting harmful behaviour, including as part of settlement agreements.	• Bullet added on not being forced to sign NDAs to prevent reporting or or seeking support, including as part of settlement agreements.
	• Ensure policies are in place handle concerns about third parties.	• Bullet added about having a policy to address concerns about third parties.
	• Make clear that 'anoymised' reports can limit what can be achieved when looking into a concern.	• Added 'where sufficient information has been provided to be able to do so' to the bullet on receiving updates.
3.3 – Managers 81% of survey respondents found these expectations clear.	• Make clear that a Manager would need the permission of the victim to report a crime in some instances.	• Final bullet updated to require permission from the alleged victim to report a concern on their behalf.

Section/Subject	You said	We did
Standard 4 – Responsive Learning Culture		
Introductory text 76% of survey respondents found the expectations in 'Standard 4 – Responsive Learning Culture' clear.	• No comments of note.	• No changes made
4.1 - Creative Industries Workforce 73% of survey respondents found these expectations clear.	• Look at the misuse of confidentiality clauses that could prevent the sharing of experiences.	• Bullet amended to clarify that sharing should not be limited by the misuse of confidentiality clauses.
	• Encourage positive feedback, as well as negative, to help reinforce good practice.	• Bullet added about 'engaging with opportunities to provide feedback on positive experiences'.
4.2 - Senior Leaders 78% of survey respondents found these expectations clear.	• Consider rephrasing 'monitoring behaviour' which feels potentially intrusive.	• Changed 'monitoring behaviour' to 'Regularly checking in and gathering feedback – both positive and negative…'
	• Encourage positive feedback, as well as negative, to help reinforce good practice.	• Added a new bullet that covers 'Keeping records and monitoring the number and type of concerns raised…'
	• Reference the misuse of NDAs to limit opportunities for collective learning.	• Added a bullet about confidentiality clauses.
	• Recommend an expectation of keeping a record of concerns raised.	• Added a bullet on keeping centralised, confidential records of all concerns raised to enable trends to be identified.

Section/Subject	You said	We did
	• Explain that it may be possible to disclose ongoing or upheld disciplinary cases in some circumstances	• Added a new bullet: 'Seeking advice when providing references for individuals whose behaviour may indicate future safeguarding risks.'
4.3 – Managers 75% of survey respondents found these expectations clear.	• The responsibilities for Managers here are quite light but could still be overwhelming for freelance Managers.	• Bullet added for Managers to identify and eliminate potential barriers to openness in their team.

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

On average, 79% of survey respondents felt that the examples of harmful behaviour in Appendix I were clear.	• Consider adding other examples or making clear that the examples given are not exhaustive.	• Added a note that the descriptions are not exhaustive.
	• Acknowledge online and upward bullying	• Added 'online' to examples of where bullying might take place and added a description of 'upward bullying'.
	• Clarify the description of gaslighting.	• Added 'denying incidents' as an example of gaslighting.
	• Strengthen the description of sexual harassment with reference to the Worker Protection (Amendment of Equality Act 2010) Act 2023.	• Updated the text on sexual harassment to make clear the legal duty of employers to take reasonable steps to prevent sexual harassment of workers, including by third parties.

Section/Subject	You said	We did
	• Clarify when 'less favourable treatment as a result of harassment' can be the case.	• Added a note that 'less favourable treatment as a result of harassment' can only be the case where the previous harassment related to sexual harassment or harassment related to gender reassignment or sex."
	• Amend the description of discrimination to align better with the Equality Act 2010.	• Changed direct discrimination description to "treating someone with a protected characteristic less favourably than others because of a protected characteristic."
	• Consider adding positive discrimination and other forms of discrimination that are not covered by the Equality Act 2010	• Added in the 'Notes' section that the descriptions are not exhaustive.
	• Explain what a 'protected act' is in relation to victimisation.	• Added a brief description of a 'protected act' under the Equality Act 2010.
	• Clarify the forms of retaliation that fall under victimisation in the Equality Act 2010.	• Amended the example of retaliations that would fall under the definition of victimisation to include 'threatening to withhold pay or block access to future work in the industry'.
	• Make the description of a microaggression clearer.	• Provided more examples of microaggressions and further explained this term.
	• Define discrimination, harassment and victimisation in the 'Key Definitions' section.	• Added a definition for 'harmful behaviour' in 'Key Definitions' and signposted to more detail in the appendices.

Section/Subject	You said	We did
Appendix II – Sample list of legislation relevant to the CIISA Standards		
61% of survey respondents found the sample list of legislation in Appendix II useful or very useful.	• Explain why this legislation is relevant to the CIISA Standards	• Added short explanations to each piece of legislation describing why it is relevant.
	• Make clear that the same legislation may cover bullying, harassment, discrimination and victimisation.	• Changed to a combined heading of 'Bullying, Harassment, Discrimination and Victimisation' for the main legislation.
	• Ensure the Standards recognise legislative position in Northern Ireland.	• Added a short note on Northern Ireland legislation and added a link to the Equality Commission Northern Ireland's website.

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