



# CIISA

The Creative Industries  
Independent Standards Authority

## **CIISA Investigations**

## **Frequently Asked Questions**

October 2025

## Introduction

CIISA is the first ever Standards Authority for the creative industries. We have spoken to many organisations and stakeholders across the sector about the services CIISA should provide to be effective in this role. As a result, we created a detailed ‘blueprint’ of our proposed services and published a summary of that on our website, called our Services Guide, [which you can read here](#).

Our Services Guide describes how, in exceptional circumstances, we would take action on the most serious and complex cases through a CIISA-led independent investigation. This document provides more details on the frequently asked questions we hear about what that may look like in practice.

We are extremely grateful to industry stakeholders from our Co-Creation Council for helping us identify, explore, and answer these questions with experience from across the Film/TV, Music, and Theatre sectors. Through this, we have been able to give significant and robust assurance to our investigation process – thank you.

The following questions are designed to provide additional information to Section 3 of our Services Guide that covers our plans to investigate.

**Part 1** covers frequently asked questions we receive about what happens during the investigation process.

**Part 2** covers questions we receive about the basis for how and why CIISA is proposing to carry out investigations as an industry-backed authority for upholding Standards in the creative industries.

**Part 3** gives illustrative scenarios of circumstances where there may be no suitable route available to a person who wishes to raise a concern.

CIISA’s services will develop and evolve as it embeds and so the information given in these FAQs can and will change over time. CIISA will also continue to obtain expert input and advice into its work to ensure it remains robust and effective.

## 1. The investigation processes

### What happens during an investigation?

A CIISA investigation is a formal, thorough process triggered when serious concerns arise relevant to CIISA's Standards, and no other suitable route is suitable. We gather evidence, speak to those involved, and build a clear picture of what happened that is measured against the expectations given in CIISA's Standards. This includes:

- Reviewing any written evidence, such as emails, texts, images etc.;
- Speaking to people involved in the matter (including those who may have witnessed what happened) or asking them to make a statement to us;
- Speaking to the organisation (or organisations) who have responsibility or oversight for the people involved in the matter;
- (where applicable) Reviewing any previous activities aimed at looking into what happened, so CIISA can get a full understanding of what (if any) action has been taken already<sup>1</sup>; and
- Reviewing if there any relevant policies or processes in place that would cover the issues raised (and how these were applied in this case if applicable).

CIISA will always ensure that everybody who is involved with the concern has the opportunity to meaningfully engage and input into the investigation and is kept regularly informed about progress throughout.

We will also ensure everybody involved has access to support during this process, including those who may be the subject of the concern.

Through this process, CIISA would build up an Investigation Findings Report that sets out the facts of what happened, alongside identifying any relevant expectations in CIISA's Standards (alongside any relevant policies that an organisation may have in place). We call this setting out "*what happened and what should have happened.*"

This helps us to assess whether there has been a breach of the Standards and (if so) what impact that has had on individuals. We will also focus on why something happened in order to look at what wider improvements can be made to ensure issues are not repeated.

### Who would carry out this investigation for CIISA?

CIISA will instruct an independent, qualified investigatory service (such as a law firm or professionally trained investigators) to do the investigation. CIISA will always make sure they have no conflict of interest and can carry out an independent investigation on CIISA's behalf.

Over time, and with the right highly trained resources in place, CIISA will build an in-house investigations team(s).

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<sup>1</sup> As we explain later, that does not act as an appeals route, but rather to get a full picture of what has happened to date.

**What happens once CIISA has carried out the investigation?**

CIISA would produce and share a draft Investigation Findings Report with the parties involved (in most cases this will be the person who is subject to the concern, the person(s) raising the concerns and any relevant organisation involved), so they can see what we have found and have the opportunity to comment on it. In cases involving multiple individuals raising concerns, CIISA will share excerpts from the Report relevant to their individual concern to ensure confidentiality.

CIISA would then pass the draft report (and any comments) to an Adjudication Panel, consisting of up to three independent Adjudicators. CIISA will ensure each Adjudicator does not have a conflict of interest in the case.

The Adjudication Panel will sit to review the draft Investigation Findings Report to make an overall finding on the issues presented.

If the Panel consider that there has been a breach of the Standards, it will then make appropriate recommendations aimed at addressing the impact that breach has had on those affected.

**Who would be on an Adjudication Panel?**

CIISA's Adjudication Panels will be drawn from a diverse and representative pool of up to twenty people – recruited for their regulatory, employment law, or creative industry experience.

CIISA will recruit these people via an independent third party. No member will sit as an Adjudicator for more than three years.

**Will CIISA investigate all the concerns it receives?**

No, CIISA will only investigate as a last resort in the most complex and serious cases, where there is no existing or suitable Human Resources (HR) route available (or equivalent) or if we are asked to by the relevant organisation (and we decided to take it on).

The decision to hold a CIISA investigation would need to be approved by our Board.

**What do you mean by a 'suitable HR route (or equivalent)'?**

This refers to having an appropriate route/avenue in place for an individual to raise a relevant concern, have that looked at and receive an appropriate response. This can include avenues such as a Speak Up reporting line. Section 3 of our Standards (Open & Accountable Reporting Mechanisms) gives more details about the expectations for how these routes/avenues should operate.

**In what circumstances do you expect CIISA to carry out an investigation into a case? What would be the threshold to decide to investigate?**

This may be relevant where there are indications one or more of the following may have occurred:

- CIISA's Standards have been significantly breached.
- There is a (significant) degree of potential harm linked to the issues raised.
- There is likelihood that the potentially harmful behaviour is continuing (or will continue), and an Intervention is required.
- There are patterns of related harmful behaviour spanning different organisations, productions, or projects (and/or across different sectors).
- There is likelihood that the issues raised are likely to impact (or affect) a wider group of people.
- There is clear need for an independent investigation to review evidence and (where appropriate) ensure there is accountability.

CIISA may also be asked to investigate by an organisation where trust in the existing process has broken down and we have been told through our co-design process that this would be a welcome service.

**Would you only investigate in situations where an organisation has asked you to?**

No. We would potentially investigate if there was a serious and complex issue to address, and there was no other suitable route available (i.e., there was no existing or suitable HR avenue (or equivalent) open to the individual(s) that would be capable of addressing the issues). This is important as a core role for CIISA is to address gaps in provision where they exist across the creative industries.

**What do you mean by 'when there is no suitable route available'?**

This is likely to include times when:

- The concern(s) involve patterns of behaviour that involve multiple organisations, productions, or projects (sometimes this could span different creative industry sectors too) - and it is clear that there is no suitable way of ensuring oversight of what has happened across them to ensure a pattern of serious issues can be identified;
- There is simply no HR service (or equivalent) available to the person(s) involved in the concern. For example, because the relevant organisation(s) does not have access to an HR service, or the individual(s) cannot access the HR service (e.g., because they are told they are not an employee);
- There is clear evidence that the HR service (or equivalent) is implicated in the concern itself, and it would not be reasonable to expect the person to go through that route as a result;
- The responsible organisation in question makes clear that they do not consider that the issue in question would fall under their HR processes (or an equivalent process); or
- The concern involves a scenario where the individuals in question are working in a self-employed/freelancer capacity, and it is clear that there is no responsible organisation/suitable HR route (or equivalent) available to them to address the issues.

Part 3 of this FAQ provides some illustrative hypothetical scenarios of where there may be no suitable route available.

**How will CIISA ascertain whether an organisation has access to a suitable process?**

We would make initial enquiries with any organisation (and individuals) to understand what avenues/routes are available and whether it is suitable for addressing the issue raised.

**Would you investigate without informing the relevant organisation, production, or project of that?**

No. CIISA would always inform all relevant parties of our proposal to investigate, and this would be done in confidence. We will investigate only where there is no other suitable route available, or if an organisation, production, or project has asked us to and we have agreed to do that. We will also not act as an appeals route for individuals dissatisfied with a relevant HR process.

**If the organisation says that they will now investigate the matter, will you allow that?**

Unless there was clear evidence that it would not be reasonable to expect the person to go through that route, we may consider that as a suitable alternative. We would require the organisation to provide CIISA with regular updates on progress and to let us know the outcome.

**What legal status does a CIISA investigation have? Will you make rulings?**

CIISA is not a court or tribunal and so cannot make a legal determination or ruling that somebody has broken the law. In such cases, CIISA would consider whether evidence should be passed to the relevant authorities (like the police or a regulator) for them to consider.

Like other Standards Authorities, we will use our industry-created Standards as our benchmark to work out whether something fell below the standards of behaviour expected.

**What sort of remedies do you anticipate being proposed at the end of investigation?**

CIISA will not impose sanctions or legal penalties, but we will recommend meaningful, restorative actions.

These may include behaviour warnings, supervision, or training focused on accountability, learning, and preventing future harm. This can also include an acknowledgment or apology that recognises the impact the behaviour has had on others. We monitor every recommendation and will chase up where needed.

Making recommendations does not duplicate existing process because these are independent, objective recommendations that an organisation can decide to take forward, or (if not) explain what they will do next to address the matter. CIISA will always monitor what action is taken to ensure any action taken resolves the issues we've identified and are not repeated.

**Will CIISA have a list or range of recommendations that it will provide?**

Recommendations will evolve as CIISA becomes operational to ensure they centre on providing a resolution tailored to the issues in hand, and align with what outcomes people seek, alongside making sure practical and achievable actions are put in place.

CIISA will not be setting out a closed 'list' of potential recommendations in any event, because that would limit CIISA's scope and ability to add value on resolving cases on a case-by-case basis.

Instead, we will be publishing a 'recommendations framework' in due course, which we will draft using input from stakeholders and via user-led research. This will set out the core principles and approach that we will apply when making recommendations, which will centre on restorative justice: looking to repair harm, restore relationships (where possible), and help to identify ways to help educate individuals in a constructive manner.

**If an individual or organisation does not accept CIISA's findings or recommendations, how would CIISA compel compliance?**

CIISA's recommendations are not binding, and CIISA cannot compel somebody to comply with a recommendation.

CIISA will monitor every recommendation that is made to monitor what action is taken to put things right. If nothing is taken forward – or there is insufficient action - we may take action against an individual or organisation, production, or project by publishing the non-compliance on our website or referring the matter to a relevant statutory regulator (or other authority) who has relevant powers to examine the issues further.

**What if the organisation or individual decides to victimise the people who have raised the concerns investigated?**

Victimisation is unacceptable. If we find evidence of it during or after an investigation, we will act - up to and including referring the matter to the Equality and Human Rights Commission (if it becomes clear somebody has been victimised whilst asserting their rights under the Equality Act 2010 by making allegations of discrimination or harassment).

**Would CIISA expect to be involved in halting or rescheduling a production or project while an investigation into allegations takes place?**

Our objective would always be to avoid this disruption. We would focus on how we can offer real-time interventions (as opposed to an investigation) to avoid productions being halted – so more than likely CIISA would want to see if it can mediate/resolve issues in real-time.

We are acutely aware of how stopping things would affect everybody working on the production or project. If CIISA is able to mediate and resolve issues on the ground, then we will do so as a first choice. Lots of creative industry organisations and productions have asked CIISA to focus on how this can be done effectively so to avoid halting the creative process.

**Would CIISA ask for a production or project to be halted against the wishes of the company, in order for a concern to be resolved?**

CIISA cannot force a production or project to be halted in any event. The only circumstance we could imagine CIISA may (as a last resort) recommend a temporary halt was if there was an allegation of a significantly serious nature that gives rise to real safety concerns (which may require police intervention and/or there is a real risk that the harmful behaviour will happen again during the production or project).

**People may be dissatisfied with the outcome of an internal HR process following a complaint and ask CIISA to review the decision. Is that something CIISA will do?**

No. CIISA will not act as an appeals route for any internal HR process within an organisation, production, or project – unless CIISA is asked to by the organisation, production, or project itself.

On a wider level, if we see a pattern or theme regarding many people being unhappy about how an organisation handles concerns, we may consider issuing a Standards Notice: a notice that alerts the organisation to the fact we have received a number of concerns and there is a potential indication of a breach of our Standards (Standard Area 3: open and accountable reporting systems).

In most cases, CIISA will recommend that the organisation, production, or project agrees to look into what is causing these concerns about the process and take action to address those. We would ask them to report back on what they have done, and we would monitor whether we see a reduction in the number of concerns.

**Would CIISA allow an individual or organisation to challenge an investigation decision?**

Yes, they can ask for a review of the outcome of an investigation. A review will be carried out by an Independent Reviewer who does not work for CIISA and does not work within the creative industries. They would be appointed to carry out independent reviews of CIISA's investigative work without any conflict of interest.

The Independent Reviewer role would be established by clear Terms of Reference that codify their independence from CIISA. An Independent Reviewer would only be able to sit in the role for a maximum of three years.

A review may occur if the party can demonstrate that (within CIISA's Investigation process and/or its Adjudication Process):

- CIISA has made a significant error of fact, and this error has a clear and material impact on the outcome.
- CIISA has arrived at an evidently unreasonable decision due to a substantial flaw or unfairness in the process.
- New material evidence or information has become known (which could not reasonably have been obtained earlier) which is likely to lead to CIISA reaching a different conclusion.

If the Independent Reviewer considers that one or more of these elements has occurred, they can ask CIISA to reconsider the decision. CIISA would then carry out more work to put right any errors identified in its Investigation Findings Report (if applicable) and put together a new Adjudication Panel to review the investigation afresh.

**Will you announce publicly that you are investigating a specific issue or concern?**

No. All of our work – particularly our investigations – is carried out in private and in strict confidence to the parties involved, and we would not publicly comment on individual matters.

## 2. The basis for CIISA carrying out Investigations

### **As CIISA is not a statutory body, how would you defend a challenge to your authority to carry out an investigation?**

CIISA was created through industry-wide commitment across Film, TV, Music, and Theatre to raise standards and create safer, fairer workplaces. CIISA's Standards - developed through deep consultation across Film, TV, Music, and Theatre - reflect what professionals expect of themselves and each other.

As the industry's Standards Authority, CIISA is authorised by the creative industries to monitor and embed the Standards on their behalf. This also meets a 'public interest' condition, helping to assure the wider public that the UK creative industries provide safe and inclusive working environments for those who work in these sectors, so to maintain public trust.

The effective monitoring and enforcing of these industry Standards include the need for impartial investigations that meet the highest requirements of fairness. Research demonstrates the majority of those working in the creative industries see CIISA-led investigations as a critical service for helping to embed the Standards in practice.

### **But what support has CIISA got to do any of this work?**

The degree and evidence of support and consensus for CIISA's role from across the creative industries and Government is significant and clear.

CIISA arose from a recommendation from the Roundtables on Tackling Bullying, Harassment and Discrimination in the Creative Industries, led jointly by Creative UK and the Department for Culture, Media & Sport (DCMS) in 2023. A history of the Roundtable can be found on [Creative UK's website](#).

From that, CIISA set up a Co-Creation Council, consisting of a significant and diverse membership of organisations and stakeholders from across the creative industries, lending significant support to CIISA's concept through their membership and input into our design.

Support for CIISA within the creative sector has grown further, including endorsement within the Government's Creative Industries Sector Vision, and forming key recommendations in the [Women And Equalities Select Committee report on Misogyny in Music](#) (2024), and in the [Culture Media and Sport Select Committee's report on British Film and High-End Television](#) in 2025.

CIISA has also received significant support from professionals working in the creative industries. In CIISA's own snap survey in 2024, 91% of creative industry professionals surveyed endorsed the need for an independent organisation where concerns can be

raised. Those working in the Screen sector also see an independent reporting body that offers a whistleblowing service as an important need.<sup>[1]</sup>

CIISA has continued to receive significant support from Government, culminating in CIISA's express inclusion in the [Industrial Strategy Creative Industries Sector Plan](#) alongside express support for CIISA in [the Government's response to the Culture Media and Sport's enquiry into British Film and High End Television](#).

In that response, the Government noted:

*"We expect industry to continue to tackle [bullying, harassment and discrimination], including through strong, cross-industry support for the Creative Industries Independent Standards Authority (CIISA)... The Secretary of State has been clear and unequivocal in her support for CIISA's work, and the government is working with industry to ensure their support... We expect the sector to support CIISA and the Secretary of State reserves the right to intervene if this is not forthcoming."*

### **Does CIISA have any legal powers or authority?**

No, CIISA does not have or exercise any statutory or regulatory powers. Instead, its authority comes from:

- the voluntary commitment and participation from creative industry organisations and individuals in aligning with (and embedding) CIISA's Standards in their work;
- the recognised public benefit of embedding safe, ethical, and inclusive creative working environments in this sector; and
- CIISA acting in accordance with the principles of fairness, transparency, and procedural integrity.

CIISA is not a substitute for legal processes or regulatory enforcement but (as a Standards Authority) acts as a complement to them via the setting and monitoring of industry-endorsed Standards.

### **What do you mean when you say that CIISA is acting in the 'public interest' within the creative industries?**

CIISA has a clear and compelling public interest in promoting safe, fair, and respectful working environments across the UK's creative industries. While CIISA is a non-statutory, voluntary body, our work is grounded in four widely recognised public interest principles:

#### Protection of Vulnerable Individuals

CIISA aims to support individuals - including freelancers and those in insecure roles - who may lack access to established workplace protections. By offering a route to raise

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<sup>[1]</sup> [Film & TV Charity Looking Glass Survey 2022](#). The most popular remedies for those who said they had experienced bullying and harassment was for an independent reporting body (55%) and an anonymous whistleblowing service (53%) specific to their sector.

concerns and promoting voluntary standards of behaviour, CIISA addresses gaps that exist in traditional employment and regulatory frameworks.

#### Public Confidence in Creative Content

Creative content is made to be consumed by the public. There is a legitimate public expectation that this content is produced in environments that are safe, respectful, and professional. CIISA contributes to that public reassurance by encouraging high standards and accountability in how creative content is made in the UK, and monitoring how those standards are applied.

#### Safeguarding the Reputation and Trust in the UK's creative industries

A strong, trusted creative sector benefits the UK culturally and economically. CIISA's voluntary framework helps uphold the industry's reputation by promoting fair practices and providing consistent guidance and oversight on workplace conduct, thereby contributing to the long-term resilience of the sector.

#### Standard-Setting for Professional Practice

CIISA is designed to offer a consistent vision for behavioural standards in working environments across the creative industries: developed by the creative industry for the creative industry. CIISA's role is therefore centred on improving workplace culture through continuous improvement and professionalisation for everybody working in the sector.

#### **Does an organisation or individual have to be signed up to the Standards in order for CIISA to investigate?**

No. Limiting investigations to only those who've signed up would leave serious gaps in accountability.

#### **What other organisations do this kind of thing?**

The [Advertising Standards Authority \(ASA\)](#) is a great example of an industry self-regulation model in the UK. The ASA have been setting (via its Committee of Advertising Practice), monitoring, and enforcing the Advertising Codes on behalf of the UK Advertising sector for over 50 years, which includes carrying out investigations into complaints about adverts and issuing rulings.

#### **If CIISA does not have legal powers, how could it compel an individual to participate in an investigation?**

CIISA cannot legally compel participation, just as any non-statutory investigation cannot compel participation. Our process is built on hand standards of procedural fairness, transparency, and trust. We will engage openly, offer all relevant parties fair and regular opportunity to contribute, and only proceed when we're confident we can reach a fair and evidence-based conclusion based on a balance of probabilities.

If CIISA can demonstrate it has followed due process, has given the individual every reasonable opportunity to participate, and is satisfied that we can access enough evidence to allow us to reasonably determine what happened, then we will proceed on the basis that we have acted reasonably and fairly – and in line with what would be expected from an Investigatory service of this type.

Any proposal to investigate would be reviewed by CIISA's Board. Where necessary, CIISA will also obtain legal advice to inform any decision.

**Would CIISA be liable for defamation if it were to investigate someone (or an organisation)?**

We take confidentiality seriously, and all investigations will be carried out in confidence and only with the parties concerned. Identifying details would only be published in rare, serious cases where a full investigation confirms a significant breach of our Standards and disclosure is clearly in the public interest.

Legal advice confirms that our fair and robust process provides a strong defence against defamation claims, particularly via CIISA arriving at conclusions through a fair and evidence based investigatory process.

**Who is included in the term “creative industries workforce” given in CIISA’s Standards? Would they potentially all fall within the scope of an Investigation?**

The agreed definition following our cross-industry consultation is:

*“Everyone who works in the creative industries (initially for CIISA in film, television, music, and theatre) regardless of their role, seniority, or employment status.... [it] includes employees, self-employed people, freelancers, contractors, subcontractors, 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...”*

All the above are covered by the Standards, and so would potentially be included in any investigation.

**How will CIISA’s work operate under the UK GDPR and Data Protection Act 2018?**

As a data controller, CIISA takes data protection and privacy of all parties extremely seriously.

Our [Services Guide](#) sets out our general approach to how we will process data securely and fairly (and in accordance with the UK GDPR and data protection laws) and we will be producing all relevant Data Protection and Privacy policies (including Data Protection Impact Assessments for all high-risk processing) in due course as we finalise our service design.

Our lawful bases for processing

CIISA’s primary lawful basis for processing personal data is that it is necessary for the purposes of CIISA’s **legitimate interests** under Article 6(1)(f) of the UK GDPR. These legitimate interests reflect CIISA’s independent role in promoting high standards and accountability within the creative industries. They include:

- monitoring and upholding CIISA’s Standards;
- safeguarding individuals, particularly those in vulnerable positions;
- addressing patterns of harmful conduct across the creative industries;

- providing accountability where statutory remedies are not used; and
- supporting and complementing existing regulators where appropriate.

In some cases, CIISA may also rely on other lawful bases such as consent (Article 6(1)(a)) or compliance with a legal obligation (Article 6(1)(c)) depending on the nature of the data and purpose of processing.

Where CIISA processes sensitive personal data (for example, relating to health, safeguarding, or allegations of misconduct), it will do so under Article 9(2)(g) of the UK GDPR and the substantial public interest conditions set out in Schedule 1, Part 2 of the Data Protection Act 2018, particularly paragraphs 10 (preventing or detecting unlawful acts) and 18 (safeguarding of individuals at risk).

If CIISA processes information relating to criminal behaviour, this will be done only where authorised under Schedule 1 of the Data Protection Act 2018 and supported by appropriate policy and procedural safeguards.

#### Accountability, transparency, and safeguards

CIISA will ensure that all processing is necessary and proportionate and will carry out Data Protection Impact Assessments (DPIAs) for high-risk activities.

We will publish clear Privacy Notices explaining what data we collect, why we use it, how long we keep it, and with whom it may be shared.

We will also ensure:

- data is collected and used only for relevant and proportionate purposes;
- information is stored securely and in confidence;
- retention periods are minimised in line with our Data Retention Policy; and
- special category data receives enhanced security and access controls.

#### **CIISA plans to carry out investigations about potential patterns of behaviour by an individual that may have occurred across different organisation. How will CIISA be able to do that whilst complying with UK GDPR?**

CIISA acts as *the* central authority for monitoring and embedding its Standards across the creative industries. This means it is uniquely placed to investigate potential patterns of harmful or inappropriate behaviour that may occur across multiple organisations or sectors.

To do this lawfully, CIISA operates as an **independent data controller** under the UK GDPR. This allows CIISA to receive and handle personal data from different organisations in the creative industries where it is necessary and proportionate to support its role in safeguarding individuals and upholding professional standards.

Each organisation remains responsible for its own data but may share relevant information with CIISA for the lawful purposes of assisting CIISA in pursuing its legitimate interests.

CIISA then reviews all the information securely and confidentially to see whether there is evidence of a repeated pattern of behaviour. If sensitive or criminal-offence data is involved, CIISA will rely on the substantial public interest provisions in the UK GDPR and Data Protection Act 2018 and apply strict safeguards to protect individuals' privacy and rights at every stage.

By operating as a trusted, central authority, CIISA can lawfully combine and assess information from multiple sources to identify wider patterns of behaviour that no single organisation can detect alone.

### **What would a CIISA Investigation involving multiple organisations look like?**

If CIISA becomes aware of a potential pattern of behaviour, it may issue separate and confidential Standards Notices to each relevant organisation, requesting their cooperation. Each Notice will be issued independently and will not identify any other organisation involved. It will ask only for the relevant data needed to assess the issues.

At the same time, CIISA will issue a Standards Notice to the individual concerned, notifying them of the proposed investigation and inviting their comments.

CIISA will then carry out an investigation in line with its usual procedures to establish what happened. We would review and analyse the information provided by each organisation to determine whether there is evidence of a repeated pattern of behaviour that breaches CIISA's Standards.

Once the investigation is complete, CIISA will share an Investigation Findings Report with the individual for comment. Each organisation will only receive the parts of the report relevant to its own involvement; no organisation will see information provided by others, to preserve confidentiality.

CIISA will then proceed to its Adjudication and reporting stages. If the Adjudication Panel determines that a pattern of behaviour has occurred that breaches CIISA's Standards, both the individual and each relevant organisation will be notified of that finding.

CIISA may publish summary details identifying the individual where there is a significant public interest in doing so. If CIISA decides to publish a summary of the investigation, it will ensure that no third-party identifying details are disclosed.

All processing is carried out under strict confidentiality, with proportionate safeguards and in line with CIISA's Privacy and Data Protection Policies, ensuring fairness, security, and respect for individuals' rights at every stage.

### 3. Illustrative scenarios of times where there may be no suitable HR route available

The table below gives illustrative scenarios of situations where no suitable route may exist to resolve a concern or issue. These are given **for guidance only**.

| Categories of 'gaps' where there is no suitable route available                                                                                                                                                                                                                                                                                | Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| The concern(s) involve patterns of behaviour that involve multiple organisations, productions, or projects (sometimes this could span different creative industry sectors too) - and it is clear that there is no suitable way of ensuring oversight of what has happened across them to ensure a pattern of serious issues can be identified. | <p>Over a period of several years, there are patterns of concerns being raised about an individual working across the Film, Audio and TV industries, suggesting a potential pattern of sexual harassment spanning several productions during that time.</p> <p>While individual companies and commissioning organisations linked to this matter conduct their own enquiries/investigations into the allegations, these are either inconclusive, only address the incidents within the scope of their own productions or result in no further action being taken.</p> <p>Due to concerns about breaching data protection laws, companies do not share the outcomes of these investigations with others. As a result, the individual moves on to new productions and projects, who are unaware of these concerns, and the behaviour continues. Frustrated by the lack of action being taken, a number of those who had raised concerns approach a journalist, who investigates and publishes an article into the allegations.</p> |
| There is simply no HR service available to the person(s) involved in the concern. For example, because the relevant organisation(s) does not have access to an HR service, or the individual(s) cannot access the HR service (e.g., because they are told they are not an employee).                                                           | <p>A small independent record label becomes aware of a number of concerns raised about an artist signed to them. Due to their size and limited resources, they have no HR service available and feel unsure as to how to deal with the matter.</p> <p>---</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Categories of 'gaps' where there is no suitable route available                                                                                                                   | Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                                                                                                                                                                                   | <p>A freelance screenwriter begins short-term project work with a TV Production Company to help out on a pre-commissioning development for a proposed show. During that process, the screenwriter experiences aggressive/bullying behaviour when working with the company's Development Producer as they create the treatment and develop/improve the pilot script.</p> <p>The screenwriter raises concerns with the Executive Producer but is told to 'deal with it' and concentrate on the work. However, it soon becomes clear that the Development Producer is aware of the concerns raised and becomes more hostile with the screenwriter, who decides to leave the project early. The screenwriter makes a formal complaint to the Production Company but is told they cannot access their HR service as they are an independent contractor.</p> <p>The writer seeks advice about constructive dismissal but is told that only employees (and not independent contractors) can bring such cases.</p> |
| <p>There is clear evidence that the HR service is implicated in the concern itself, and it would not be reasonable to expect the person to go through that route as a result.</p> | <p>An assistant Engineer raises concerns about a senior Producer at an independent music studio, who keeps making inappropriate and sexualised comments to them. They raise concerns with the Lead Engineer, who (in turn) refers them to the studio's Manager, who looks after the general HR for the studio (such as payroll and contracts) as well as the day-to-day administration/management.</p> <p>The Studio Manager decides not to carry out any review or investigation into the matter, saying there is no evidence of wrongdoing. They also informally say to the member of staff to 'not cause a scene' given the seniority of the Producer.</p>                                                                                                                                                                                                                                                                                                                                              |

| Categories of 'gaps' where there is no suitable route available                                                                                       | Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|                                                                                                                                                       | <p>The member of staff returns to the Lead Engineer, but they make clear there is nothing more they can do. The Lead Engineer tells the junior Engineer they can escalate the matter if they want to, but that it will go to the leadership of the studio (and the Producer in question) as a result. When the member of staff says that would be inappropriate, the Lead Engineer makes clear that that is the only route available.</p> <p>----</p> <p>A freelancer working for a small production company experiences aggressive, bullying behaviour from the Production Manager. They want to raise a concern, but the HR/grievance route in the company means the concern would go to the Executive Producer, who happens to be in a relationship with the Production Manager. When the freelancer makes discreet enquiries, they are told that it would be 'unwise' to raise a concern as there have been other instances where people who raise a concern were simply let go and then struggled to get work elsewhere.</p> |
| <p>The responsible organisation in question makes clear that they do not consider that the issue in question would fall under their HR processes.</p> | <p>A UK production company is hired to co-ordinate filming for an international film production within the UK. The filming is due to take place over a week, with the film's stars flying in from overseas.</p> <p>The production company is asked to ensure the film's lead actor has a runner/assistant assigned to them during filming.</p> <p>The production company hire a female freelance runner to support the actor, but she complains to the Production Co-ordinator that he is making inappropriate, sexually orientated demands of her. The Co-ordinator informs the Production Manager, who says that they will not take it further as they are not responsible for</p>                                                                                                                                                                                                                                                                                                                                              |

| Categories of 'gaps' where there is no suitable route available                                                                                                                                                                           | Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                                                                                                                                                                                                                                           | <p>the overall production of the film, and that the runner is a freelancer (and so not a member of staff). The Manager also informally tells the Co-Ordinator that they should not escalate the matter to HR as it is likely to mean both of them (i.e., the Co-Ordinator and the Runner) will not get further work.</p> <p>There is no process in place to raise concerns to the international film production regarding what happened in the UK. The Production Manager also indicates that they are not prepared to raise the concern with the international film production as they will lose business with them in the future.</p>                                                                                                                                                                                                                                                                                                                                |
| <p>The concern involves a scenario where the individuals in question are working in a self-employed/freelancer capacity, and it is clear that there is no responsible organisation/suitable HR route available to address the issues.</p> | <p>A live music venue is hired for a concert for a band. During set up/rehearsals, staff at the venue witness the lead band member being extremely aggressive to one of the band's entourage who is helping with set up. One member of staff says they witnessed the band member assaulting the individual backstage.</p> <p>The staff are deeply uncomfortable with this behaviour. They raise the issue with the Venue Manager, who speaks to the band's Manager, who (in turn) dismisses the issue and says it is not for the venue to intervene.</p> <p>The Venue Manager considers they cannot do anything further as the HR process in place only covers members of staff and not with people who are associated with the hire/use of the venue.</p> <p>---</p> <p>Months after a festival has ended, concerns are raised to the festival company about poor/inappropriate behaviour of security and marshalling staff supplied by a third-party contractor.</p> |

| Categories of 'gaps' where there is no suitable route available | Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                                                                 | <p>The festival company say they could raise the issue with the company but find that the contractor has stopped trading. However, they also note that the contractor is solely responsible for ensuring those who are working for them vetted and monitored/managed whilst carrying out the work. The festival company say they take all reasonable steps to ensure contractors are compliant with relevant standards but cannot be held responsible for handling complaints about another firm's staff.</p> <p>The festival company also note that they have no contractual clauses in their procurement processes to require contractors to have a feedback/complaints mechanism in place in any event.</p> |