

Bullying and Harassment Code of Conduct

Creative UK is committed to eradicating bullying and harassment across our organisation and industry. We are taking action to prevent and address abuses of power and position to ensure a safer, more welcoming, and inclusive environment for all.

This guidance is intended to build on the [BFI's set of principles](#) which tackle and prevent bullying, harassment and racism in the screen industries. It should be read alongside our anti-racism statement, equal opportunities policy and principles, and grievance procedures.

We recognise that bullying and harassment are unacceptable behaviours that affect far too many workers in the UK creative sector. Abusers often come from senior industry figures who are in powerful positions and well connected; victims can be afraid to speak out and can be shunned by the industry if they raise concerns. There is a need to rebuild trust in the sector, to provide avenues for reporting and to act when incidents are reported.

Everyone is responsible for creating and maintaining an inclusive workplace that is positive and supportive. Here at Creative UK we:

- Will not tolerate bullying or harassment, including sexual harassment, within our own organisation, our network, or the wider UK Creative Industries.
- Recognise that harassment is unlawful under the Equality Act 2010.
- Take seriously our responsibilities under the Health & Safety at Work Act 1974 and other relevant legislation.
- Will ensure that there are processes in place for the reporting and investigation of these serious issues. This will include providing adequate protection for complainants and victims.
- Recognise that reporting bullying and/or harassment can be intimidating. We respect confidentiality where possible and aim to make the process of reporting clear and straightforward. If anyone comes forward to report behaviour which might amount to bullying or harassment, we will endeavour to investigate objectively. Individuals who make complaints of bullying and/or harassment or participate in good faith in any investigation will not suffer any form of reprisal or victimisation as a result.
- Take appropriate action against perpetrators where bullying or harassment is found to have occurred
- Consider people equal without prejudice or favour. We build relationships based on mutual respect. We will all work to give and receive feedback in a constructive way, which we know will improve creativity and productivity.
- Will respect each other's dignity, regardless of the seniority of our role in the organisation.
- Will share these codes of conduct with all our staff, freelancers, contractors, volunteers, and members so that everyone knows the standard of behaviour that is expected.

Definitions

Harassment is defined as unwanted conduct which is related to a protected characteristic of the Equality Act 2010 (age, sex, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation), which has the purpose or effect of violating a person's dignity, or creating for that person an intimidating, hostile, degrading, or humiliating environment.

Bullying is defined as intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Bullying and harassment can be:

- intentional or unintentional, targeted at an individual or a group;
- not specifically targeted but have an overall impact that creates a negative work environment;
- repeated behaviour over a period of time, or one isolated incident;
- between workers and/or managers at the same or different levels in the organisation;
- in the same or different departments or areas of work within or outside of the organisation;
- between employees, workers and external contractors and/or clients within or outside of the organisation;
- mobbing – when more than one person is involved;
- neglect or marginalisation;
- during daily work activities, at work-organised events held on-site or off-site, inside and outside of working hours;
- face-to-face, over the telephone, by email, text messages and online, e.g. social media platforms.

It is important to note that not all harassment is sexual but keep in mind that, with sexual harassment:

- a hug, kiss on the cheek, or casual touch is not necessarily sexual harassment. The key is whether the behaviour was unwanted or offensive;
- it does not matter if a person has sexual feelings towards the recipient, only that the behaviour is of a sexual nature and that it was unwanted and/or offensive;
- sexual harassment is gender neutral and orientation neutral. It can be perpetrated by any gender against any gender.

Examples of bullying and harassment

The following is by no means an exhaustive list but it can be used to highlight the range of 'unwanted conduct' or inappropriate behaviour.

- Shouting, swearing, intimidating, threatening or throwing things.
- Belittling a person's creative input or not letting them express their opinion in the first place.
- Unfairly blaming others – e.g. for the failures of technology; humiliation and ridicule either in private, at meetings or in front of colleagues/customers/clients.
- Spreading malicious rumours, or insulting someone by word or behaviour.
- Copying memos that are critical about someone to others who do not need to know.
- Ridiculing or demeaning someone or picking on them.
- Innuendo or mockery.
- Threats, abuse, teasing, gossip, banter or practical jokes/pranks.
- Unwelcome sexual advances – touching, standing too close, the display of offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected.
- Homophobic, racist or sexist comments, offensive gestures.
- Excluding individuals or groups or socially isolating them.
- Unfair treatment, such as tasks with unachievable deadlines.
- Overbearing supervision.
- Making threats or comments about job security without foundation.
- Deliberately undermining a competent worker by overloading them.
- Undermining with constant criticism.
- Preventing individuals progressing by intentionally blocking promotion or training opportunities.
- Intruding on a person's privacy by pestering, spying or stalking.
- Tampering with a person's personal belongings or work equipment.
- Cyber-bullying conducted online by email, online messaging, online gaming or social media channels, e.g. offensive language, embarrassing pictures or videos, fake profiles, death threats.

How you can raise a complaint if you experience or witness bullying or harassment at work

Creative UK adheres to the ACAS statutory Code of Practice on grievance and you should refer to this code if/when necessary.

This procedure is designed to ensure that any problem or grievance you have is properly and fairly examined. In the first instance if you have any grievance relating to bullying & harassment, you should raise with your Line Manager informally. This does not constitute a formal part of the grievance procedure.

If the matter is not resolved you may invoke the formal procedure:

1. You may raise it again with your Line Manager, in writing. Your Line Manager will convene a meeting to be held without unreasonable delay to discuss the case with you. This meeting may be adjourned for any investigation that may be necessary. Your Line Manager will give you a written response as quickly as possible and normally within 2 working days (or following completion of any investigation).
2. If you are not satisfied with the response, you may raise the grievance further with the Director of People & Operations. The grievance must be raised in writing and be within one week of receiving your Line manager's response. The Director of People & Operations will convene a formal meeting to resolve the issue, and will confirm their decision to you in writing within 14 days following a full investigation. The Director of People & Operations and/or CEO's decision is final.

If your complaint relates to the conduct of your Line manager, you should raise it with the Director of People & Operations.

At a formal meeting under this procedure, you may be accompanied by a work colleague or trade union official. Where there is a reference to "in writing", this may be done by email. At each stage, the main matters discussed in the meeting will be recorded and agreed with you wherever possible.