



Part 1: Statement of intent

Everyone deserves a happy, healthy and safe place to work. At Creative Lives, we aim to nurture a working environment that is aligned with our core values that our people and practices are legal, safe, scrupulous, open and accountable, and consistent and that everyone is treated equally and feels included. We expect and champion a culture built on respect, and there can be no place for harassment, bullying or sexual harassment in our organisation.

We are committed to working together to ensure that Creative Lives is a safe space for all, where everyone is respected and listened to, and where people feel confident to challenge bullying, harassment and sexual harassment, and where we are confident in addressing inappropriate behaviour.

This policy identifies the actions we will take to create this working environment for all of our people. Where problems occur, it explains how we will support you to speak out, and the actions you can expect us to take.

Part 2: What does this policy relate to?

In appendix A, we have included some common definitions for *what we mean by 'harassment, bullying, and sexual harassment'*. However, bullying and harassment in practice is defined by those making a complaint that something has happened to them that is unwelcome, unwarranted and causes a detrimental effect. If someone complains they are being bullied or harassed, then they have a grievance which must be dealt with regardless of whether or not their complaint accords with a standard definition.

Harassment, bullying and sexual harassment can take many forms and all scales, from the relatively (and regrettably) everyday, to the most serious. It may be verbal or written, physical, visual or sexual, overt or subtle, and can take place in virtual or online working environments, as well as face to face. The perceived severity of an incident may differ from individual to individual, as will the type and nature of response required. Whilst harassment, bullying and sexual harassment takes many forms, there are common patterns of behaviour which should be avoided (this is by no means a comprehensive list):

- It is never acceptable to verbally objectify anyone's body, or to make overly personal, sexual or suggestive communications.
- It is never appropriate to initiate unwanted physical contact.
- It is never appropriate for someone in a junior role to be asked by someone in a senior role to work outside hours in their private home, nor to enter their hotel bedroom when working away from home.
- It is never acceptable to offer professional advantage in return for sexual concessions, nor to threaten negative consequences after the rejection of such advances.



- It is not appropriate to disregard or disrespect agreed working boundaries. Whilst emergencies may occasionally require out-of-hours contact, we should not be placing unreasonable demands on staff to be in contact beyond their working hours, on their personal communications channels, or to respond instantaneously.

This policy applies to all staff and volunteers working with Creative Lives, including Board members, as well as freelance and contract staff.

Part 3: Reporting harassment, bullying and sexual harassment

3a. Addressing problems directly

As a first step, and where it is safe and possible to do so, we encourage everyone (not just those who are the targets of such behaviour) to call out incidences of harassment, bullying and sexual harassment as they occur, and directly with the individuals involved. This is often the fastest way to a resolution and helps to reinforce our culture. Peer networks are a vital source of support, and everyone should feel enabled and confident to go to peers with concerns where this feels the most appropriate first point of contact.

3b. Reporting channels

Creative Lives will provide a range of reporting channels to ensure everyone feels able to report harassment, bullying and sexual harassment. We appreciate that traditional line-management hierarchies might not always enable reporting (especially where a line manager is a perpetrator of harassment, bullying and sexual harassment).

The responsibility to address harassment, bullying and sexual harassment sits with everyone at Creative Lives. In addition to existing line management structures, dedicated staff contacts with regard to harassment, bullying and sexual harassment will be the Chief Executive and HR Director. The Board will be asked to nominate a point of contact for reporting concerns. Anyone may raise any concern or complaint about harassment, bullying and sexual harassment with their line manager, or with any of the following contacts:

Robin Simpson Chief Executive robin@creative-lives.org 07834693819	Lindsey Jackson HR Director lindsey@creative-lives.org 02920 395395 / 07515 524 010	Helen Keatley Creative Lives Board member helen@creative-lives.org
Bobsie Robinson Creative Lives Vice Chair bobsie@creative-lives.org		

These contacts will be reviewed and updated annually as part of the HR Director and CEO annual review process to ensure that the list of contacts always includes a diverse range of people.



3c. Reporting processes

If you are experiencing harassment, bullying or sexual harassment, or if you have a concern about something happening within the workplace, as a first step you should raise your concerns with either your line manager or with one of the nominated contacts above.

Where required, the HR Director (or another member of staff, where appropriate) will then action the Creative Lives Grievance Procedure, via informal, then formal procedures:

- Where required and appropriate, cases will be dealt with in accordance with the Creative Lives Grievance and Disciplinary Procedure.
- Where complaints or concerns are raised by someone outside the Creative Lives staff team, procedures will follow the Creative Lives Complaints Procedure.
- If a concern is raised about organisation-wide cultures or behaviours, that goes beyond the actions of - or on - individuals, then the Creative Lives Whistleblowing Policy should be used.

In recognition of the abuses of power inherent in many cases of harassment, bullying and sexual harassment, it will be essential to work with the employee to identify routes of escalation that bypass any individuals who may be involved in the case itself.

When any report of harassment, bullying or sexual harassment is made, it should be logged with the HR Director, even where no further action is desired, so that patterns may be identified.

Once harassment and abuse is proven, it must not be hidden as a reason for dismissal. Inappropriate confidentiality agreements prevent organisations being able to recognise the patterns of behaviour or the people who perpetrate it.

Part 4: What wider action can you expect from Creative Lives?

As part of our commitment to tackling harassment, bullying and sexual harassment, Creative Lives will:

- Identify the particular risks associated with our working environment,
- Set out expectations for all staff in creating a safe working environment,
- Provide training and awareness-raising opportunities for all staff, and especially for those with line management responsibilities,
- Create opportunities for discussing harassment, bullying and sexual harassment at key moments in each person's employment, and



- Review our practices regularly.

4a. Particular risks associated with our working environment

Creative Lives employs small teams of people, often working in close proximity to one another, but in relative isolation from wider staff teams. We also work with people in the early stages of their career, students on placement, and with staff based in partner organisations' premises. Since 2020, we often work online, or from home. All of these situations present particular risks, and pose challenges for seeing, challenging and addressing abuses of power.

We all have a responsibility to make Creative Lives a safe, inclusive and welcoming place, and there are actions we can all take to enable this. Where we are made aware of issues taking place outside our organisation but relating to our staff (for example, in partner organisations who work regularly with Creative Lives), we will support staff to raise concerns, call out problems, and address issues.

4b. Expectations of all staff in creating a safe working environment

We should all take responsibility for our behaviour, power and actions. Consider what power you hold (thanks to your position, gender, status or other cultural signifiers). Be aware of who may be (or may feel) vulnerable or less powerful than you, and how your interactions may be interpreted by people who are in a different position of power to yourself. Recognise the blurred boundaries between work and social spaces - don't exploit them.

We all have the power to 'call out' unacceptable behaviour, and to support others to do so. This is often the most immediate means of addressing issues and publicly 'living' our culture. Support others who choose to share their discomfort with you or who raise concerns with others about their behaviour - do not be a bystander.

For those with a line management responsibility or leadership role, there is a particular expectation and responsibility to proactively watch for and address behaviour to set our culture in a direct and unambiguous way. We expect all senior members of staff to be open to hearing and supporting concerns about harassment, bullying and sexual harassment.

4c. Training and awareness-raising opportunities

We will raise awareness of harassment, bullying and sexual harassment by hosting annual all-staff training events.. We will use existing and bespoke staff events to normalise the culture of talking about harassment, bullying and sexual harassment, champion our culture and give people the confidence and skills to challenge inappropriate behaviour or language.

4d. Opportunities for discussing harassment, bullying and sexual harassment at key moments in each person's employment

There are key moments for surfacing concerns setting expectations and maintaining our commitment:



Inductions: All staff and volunteers should be inducted into our Harassment, Bullying and Sexual Harassment policy at the commencement of their time with Creative Lives.

Appraisals and supervision sessions: The opportunity to raise concerns or misgivings about any aspect of harassment, bullying or sexual harassment will be built into Creative Lives appraisal processes, with a specific question added to address this topic. Managers will be encouraged to raise this as a topic for regular, informal discussion with teams and individuals to promote an open culture.

Managers should create the opportunity to have these discussions in a private space.

Senior leadership: Check in sessions: Each National Convener will be asked (or will be asked to nominate an alternative Board member contact) to take responsibility for leading our harassment, bullying and sexual harassment commitment at a governance level.

The Chief Executive and nominated Convener will each take a specific remit to check-in with Departmental staff on at least a yearly basis, including specific opportunity to discuss any concerns or misgivings relating to harassment, bullying and / or sexual harassment. This may take place as part of the annual away-day, or other existing opportunities to meet with whole staff teams.

On leaving the organisation: All staff and volunteers should be offered (and encouraged to make use of) two exit interviews at the end of their time with us - one with their line manager and one with another member of staff (usually the CEO or HR Director). Both interviews should specifically offer the opportunity to discuss experiences of harassment, bullying and / or sexual harassment. All staff will also be offered the opportunity to have an exit interview with a Board member.

4e. Reviewing our practices regularly.

To ensure both this policy, and our implementation of it, remains accurate and up to date, we will:

Every year	Check and update contacts for reporting harassment, bullying and sexual harassment. HR Group to meet and discuss on an annual basis with the CEO any areas of concern. Training and development plan to create opportunities and awareness for all staff.
Every three years	Board and staff team to review policy and embed changes based on best practice and experiences within the organisation.

Part 5: Appendices

Appendix A: What we mean by ‘harassment, bullying, and sexual harassment’

Bullying may be characterised as *offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient*. Bullying itself isn’t against the law, but harassment is.

Harassment as defined in the Equality Act 2010 is: *Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual*.

Examples of bullying or harassing behaviour include spreading malicious rumours, unfair treatment, picking on or regularly undermining someone, setting unrealistic expectations for communicating instantly, via personal channels or outside working hours, or denying someone’s training or promotion opportunities. However, bullying and harassment in practice is defined by those making a complaint that something has happened to them that is unwelcome, unwarranted and causes a detrimental effect, including experiences of racism and racial trauma. If employees or staff complain they are being bullied or harassed, then they have a grievance which must be dealt with regardless of whether or not their complaint accords with a standard definition.

Sexual harassment is bullying or coercion of a sexual nature, or the unwelcome or inappropriate promise of rewards in exchange for sexual favors. Sexual harassment can include unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. Sexual harassment encompasses all forms of sexual assault and sexual violence, domestic violence, dating (intimate partner) violence, and stalking.

Appendix B: Accessing further support

We recognise that Creative Lives is not a specialist provider of support to those who have experienced sexual harassment. Where appropriate, staff should be directed to ongoing specialist sources of support.

Some useful resources and sources of support include:

- Rape Crisis offers information, help and support after sexual abuse, rape and all forms of sexual violence (0808 802 9999 in [England and Wales](#), 08088 01 03 02 in [Scotland](#), 1800 778888 in [Ireland](#)).
- The [National Bullying Helpline](#) offers information advice for anyone dealing with bullying, including both children and adults. They have [specific information on workplace bullying](#).
- [Citizens Advice](#) offers advice for those considering taking action about



harassment.

- ACAS offers free, impartial advice and a range of resources on [discrimination, bullying and harassment](#) in the workplace.
- [Samaritans](#) offer free and confidential advice, 24 hours a day, 365 days a year.

Appendix C: Connection to existing Creative Lives policies

This policy supports and connects to the following existing Creative Lives policies:

- Complaints policy: Where complaints or concerns are raised by someone outside the Creative Lives staff team
- Grievance procedure: For dealing with cases of harassment, bullying or sexual harassment.
- Disciplinary procedure: For investigating and handling cases of harassment, bullying or sexual harassment.
- Whistleblowing policy: If a concern is raised about organisation-wide cultures or behaviours, that goes beyond the actions of - or on - individuals.
- Equality, Diversity and Inclusion Policy: “Equality, diversity and inclusion is an organisation-wide commitment that permeates all aspects of our work”.
- Volunteer policy: In recognition of hierarchical relationships within the organisation, and that we “strive to ensure that volunteers are not exploited or treated unfairly or unreasonably”.
- Police checks (including as relates to volunteers)
- There are connections with our data protection policy: handling of ‘sensitive personal data’ (Data protection policy).
- Communications policy: “We communicate in a spirit of co-operation, trust and consideration for others”.

Approved by the Creative Lives Board of Directors, October 2022
Review by October 2025