TV Production Guidance:
Managing the risk of Coronavirus (COVID-19) in production making
(Version 6 – 19 January 2021)

January 2021 government update: National 'stay at home' restrictions apply currently across all 4 nations of the UK. People should stay at home where possible and should only travel to work if they cannot work from home.

Find out about the new restrictions and what you can and cannot do by reviewing the detailed guidance and links below:

Travelling to work (Detailed guidance: England, Wales, Northern Ireland, Scotland)

You can only leave home for work purposes where it is unreasonable for you to do your job from home. This includes, but is not limited to, people who work within critical national infrastructure, construction or manufacturing that require in-person attendance.

Employers and employees should discuss their working arrangements, and employers should take every possible step to facilitate their employees working from home, including providing suitable IT and equipment to enable remote working. Where people cannot work from home, employers should take steps to help employees avoid busy times and routes on public transport.

Clinically Extremely Vulnerable (Detailed guidance: England, Wales, Northern Ireland, Scotland) Those who are Clinically Extremely Vulnerable are advised to work from home. If you cannot work from home, then you are advised not to attend work. Please see GOV.UK guidance on shielding and protecting the clinically extremely vulnerable and refer to the detailed guidance for the nation you are in for more specific detail on what is required..

This latest version of the guidance has been reviewed and revised in light of the emergency of the new variants of SARS-CoV-2 which have come to light and the need to take increased action to reduce the spread of the virus in the UK.

This document is intended as a high-level framework to provide guidance and support for the effective assessment and management of COVID-19 risk in TV production. This should be read in conjunction with general guidance provided by the government about management of COVID-19 risks in workplaces.

Under this guidance:

Producers will need to:

- complete suitable and sufficient risk assessment about COVID-19 risks for their activities,
- record how they are managing significant COVID-19 risks in a COVID-19 risk assessment document,
- engage with their workforce, any recognised trade union and/or employee representatives with this process (providing information to employees about how they will keep people safe, prior to the commencement of production),
- display information[1] on compliance with government guidance in workplaces in the form prescribed in government guidance,
- put together information to assure others (including Commissioners) that appropriate assessments have been completed, publishing this information on their website wherever possible, particularly if they have more than 50 employees.

Commissioning Broadcasters will also need to engage with Producers around how COVID-19 risks are assessed and can be managed as certain measures and restrictions will impact both the cost of production and the content itself.

This guidance provides background information and risk assessment guidance for TV production which includes detail on basic requirements, key areas to consider and controls. The latest government guidance and information for the UK can be found on the GOV.UK[2] website. For specific guidance relevant to Scotland, please see the latest guidance and information on the Scottish Government[3] website. For Wales, please see the latest on the Welsh Government[4] website and for Northern Ireland please see the Northern Ireland Government[5] website.

COVID-19 is a health and safety risk that should be considered within the overall responsibility structure which ensures appropriate standards of health and safety are achieved and maintained throughout the production process.

This guidance covers the broad range and scale of all TV programme making in every genre for TV. Specific information and guidance on managing the risks associated with film and high-end TV drama productions can be found in the British Film Commission (BFC) guidance[6] which should also be considered for productions within that genre.

This guidance has been produced through a collaboration of cross industry experts in this area along with external expertise provided by Dr Paul Litchfield CBE and Mary Lawrence, Partner, Osborne Clarke LLP.

---

[1] https://assets.publishing.service.gov.uk/media/5eb966c8d3bf7f5d3e24afb7/staying-covid-19-secure-accessible.pdf
[2] https://www.gov.uk/
[3] https://www.gov.scot/coronavirus-covid-19/
[4] https://gov.wales/coronavirus
[5] https://www.health-ni.gov.uk/covid-19-legislation
[6] http://britishfilmcommission.org.uk/guidance/regarding-covid-19-coronavirus/

This guidance was accurate as at the date of publication. When using, you should check that there have not been any recent significant changes in law/ relevant guidance which have not yet been included in a further update document.

Background
These are exceptional circumstances and the industry should comply with the latest Government advice on COVID-19 at all times.

These guidelines are based on the practical application, within a TV production setting, of the latest government guidance. Whilst this guidance makes note, where known, of variances within the four nations, those operating in Scotland, Wales, Northern Ireland, the Channel Islands and the Isle of Man should check any local restrictions. The health and safety regulators within each nation will consider government guidance in connection with the management of workplace risks in the enforcement of relevant health and safety regulations.

These guidelines would be the starting point for any productions undertaken by UK based production company, but clearly in each individual case the production company would need to be cognisant of any more specific restrictions locally within any one of the nations.

Can we still produce TV in the UK?
Specific consideration should be given to any localised Coronavirus restrictions which could impact on filming before the filming takes place.

In England from 6 January 2021 you can only leave home for work purposes where it is unreasonable for you to do your job from home. However, those who cannot work from home can continue to travel to their workplace. This will cover all aspects of the production process, including scouting and recces. It includes travelling for work purposes within England and internationally. Staying in a hotel for work purposes will be permitted. Filming can continue to take place in the premises of businesses that are closed to the general public due to the system of Local COVID tiers and 'Stay at Home' requirements. Separate guidance[7] in relation to 'clinically extremely vulnerable' individuals who are asked to shield during 'Stay at Home' restrictions should be considered. These individuals are strongly advised to work from home will be asked not to go into a workplace which includes TV production.

Any business planning a TV production in Scotland should first check the [Strategic Framework](https://www.gov.scot/publications/covid-19-scotlands-strategic-framework/)[8] and the protective level allocated to the area(s) where they will work, which will dictate the measures to be observed. TV production can continue operating at all levels and under the further restrictions that came into effect on 5 January 2021, but this should be done with the minimum number of people needed to operate safely and effectively and in compliance with all relevant [Scottish Government](https://www.gov.scot/publications/coronavirus-covid-19-guidance-on-film-and-high-end-tv-production/pages/restrictions-on-operating-in-scotland/)[9] and industry safe working guidance.

---

[7] https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19

[8] https://www.gov.scot/publications/covid-19-scotlands-strategic-framework/

[9] https://www.gov.scot/publications/coronavirus-covid-19-guidance-on-film-and-high-end-tv-production/pages/restrictions-on-operating-in-scotland/

Television production is permitted under current restrictions in England, Northern Ireland, Scotland and Wales.

Where 'stay at home' requirements are in place, audiences will not be permissible although paid and non-paid contributors on programmes may still be permitted as workers. Further guidance on audiences exists in Scotland.[10]

More detail on local restrictions can be found here;
- England [11]
- Wales [12]
- Scotland [13]
- Northern Ireland [14]

The law on gatherings of people vary from UK country to country and it is really important to check the law as at the date of production activity. These restrictions are primarily in relation to social gatherings and are unlikely to apply to the operation in a business context. However, it will continue to be important to consider restrictions carefully within the production risk assessment. In particular, consideration should be given to the application of restrictions (and any measures which will need to be taken by a production company to allow filming under restrictions) where unpaid contributors/ talent are being filmed.

Planning for the management of the COVID-19 risk should be done in close collaboration with your commissioning network. If you engage third parties to provide the production with key services or equipment you should review their risk management plans for COVID-19 as part of your own planning where they could impact the overall risk on your production and/or you are reliant upon them for the provision of people, products or services that are key to your production or specifically they could impact your COVID-19 risk management plan.

If travel to/from the UK is required as part of the production you should consider the latest government travel advice[15] and plan for this, you should also take into consideration that this advice can be updated at very short notice. Exemptions around quarantine requiremetns for individuals coming into the UK to work on television productions have been removed other than in relation to travel inside the Common Travel Area (e.g. travel from England, Wales or Scotland) to Northern Ireland.

For travel in Northern Ireland, Scotland and Wales you should refer to regulations and guidance from relevant authorities. Productions should always consider whether there are local restrictions in place where they are filming and also seek to minimise required travel distances, consider whether local

---

[10] Coronavirus (COVID-19): guidance for the performing arts and venues sector - gov.scot (www.gov.scot)
[11] https://www.gov.uk/guidance/local-restriction-tiers-what-you-need-to-know
[12] https://gov.wales/coronavirus-regulations-guidance
[13] https://www.gov.scot/coronavirus-covid-19/
[14] https://www.nidirect.gov.uk/articles/coronavirus-covid-19-regulations-guidance-what-restrictions-mean-you
[15] https://www.gov.uk/guidance/travel-advice-novel-coronavirus

cast and crew can be used and avoid risks where possible from travelling by public transport or car-sharing.

In certain circumstances workplace COVID-19 infections are reportable under RIDDOR[16], the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 - these requirements should be considered within production protocols. Additionally, production companies need to consider the requirements to report any Covid cases to Public Health England[17], Health Protection Scotland[18], Public Health Wales[19] and the Public Health Agency in N Ireland (see section below on the different requirements).

In applying this guidance, employers should be mindful of the particular needs of different groups of workers or individuals. It is unlawful to discriminate, directly or indirectly, against anyone because of a protected characteristic such as age, race, gender reassignment, marital or civil partner status, religion or belief, sex, sexual orientation, (in NI in relation to political opinion or a person with dependents) or disability. There are certain exceptions to this where a balance can be struck and provided that such conduct can be objectively justified. Employers also have additional responsibilities towards disabled workers and those who are new or expectant mothers.

---

[16] https://www.hse.gov.uk/coronavirus/riddor/index.htm
[17] https://www.gov.uk/government/publications/reporting-outbreaks-of-coronavirus-covid-19/covid-19-early-outbreak-management
[18] https://www.gov.scot/publications/coronavirus-covid-19-general-guidance-for-safer-workplaces/pages/workforce-planning-and-support/
[19] https://gov.wales/employers-coronavirus-test-trace-protect-guidance

<u>Coronavirus (COVID-19) - Risk Assessment Guidance</u>

<u>Basic requirements</u>
1. **Specifically consider people at higher risk of harm**
2. **Heighten precautions for everyone at work**
3. **Reduce the number of people involved**
4. **Consider editorial 'on camera' requirements**
5. **Consider mental health and wellbeing**
6. **Feedback loop**

1.   Specifically consider people at higher risk of harm

COVID-19 is a disease which is more likely to lead to severe illness (and even death) in some groups of people. Those who fall into these higher risk groups[20], or live in a household where people are classed as being clinically extremely vulnerable[21], should have their participation considered individually to determine whether it is appropriate for them to participate and, if so, what additional precautions should be applied.

You should introduce an appropriate way to identify people who are at significantly higher risk of becoming seriously ill. The government guidance notes[22] for businesses set out principles on how to protect those at higher risk. These guidance notes along with the NHS guidance[23] are helpful in identifying people who are most likely to require personalised risk assessments but they are not exhaustive and anyone who expresses concern about their own risk (perhaps based on the advice of their own medical practitioner) should be considered individually.

Advice relating to the clinically extremely vulnerable was updated on 31 December[24] 2020. Currently everyone is advised to work from home where possible and those classed as clinically extremely vulnerable should not go to the workplace if they live or work in areas where shielding is active (e.g. England Tier 4 and above).   For anyone else with a significantly higher risk of becoming seriously ill or who expresses concerns, you should discuss their participation with them in the context of advice from their own health professionals and, if appropriate, any company medical advisor.

In Scotland, the term 'extremely high risk of severe illness' is used for this group of people and further guidance can be found at NHS Inform[25].

---

[20] https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk/whos-at-higher-risk-from-coronavirus/
[21] https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19#cev
[22] https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19
[23] https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk/whos-at-higher-risk-from-coronavirus/
[24] https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19
[25] https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19/coronavirus-covid-19-shielding

2.   Heighten precautions for everyone at work

It is essential that everyone involved with the production applies good practice in terms of "Hands, Face, Space". That involves the regular washing or sanitising of hands, wearing a face covering in enclosed spaces where there are other people and maintaining social distancing of at least 2 metres.. Good hand hygiene practice is to: 'wash your hands more frequently and at least for 20 seconds each time. Use soap and water or a hand sanitiser when you: get home or into work, blow your nose, sneeze or cough, eat or handle food'.

Anyone with symptoms of fever, persistent cough or loss of sense of taste/ smell, or living with someone who has developed symptoms, must remain at home in accordance with current government instructions. You should consider the best way to reinforce this message within your production. This may be in the form of self-declarations, daily or periodic checks or other ways deemed appropriate for your production. If the process introduced collects any personal data, you must ensure this is in line with GDPR requirements.

A raised temperature is one of the most common signs of developing COVID-19. You may therefore choose to introduce temperature checks for people involved in the production, if you do appropriate protocols will need to be developed and due consideration given to any potential data privacy issues.

Make sure everyone's contact numbers and emergency contact details are up to date and everyone is made fully aware of symptoms and when they should not be at work. It is also important to consider how you keep records of who is in the workplace and when so that in the event of a positive test of an individual who has been in the workplace you are able to inform other members of the production team as appropriate.

Production schedules and plans should take into consideration the extra time required to properly implement the measures required under this guidance. Specific training for production teams may also be required in managing the COVID-19 risk to give specific guidance on applying the identified controls and understanding the risks. This training will need to be suitable, sufficient and timely and should be detailed through the risk assessment process.

Where 'stay at home' requirements are in place, audiences will **not** be permitted although paid and non paid contributors on programmes may still be permitted as workers. Where 'stay at home requirements are not in place, restrictions should be considered carefully to check whether an audience is permissible and plan for this in line with the latest government guidance and requirements including the guidance for the Performing Arts[26] in England and guidance for the performing arts and venues sector[27] in Scotland.

When audiences are permitted, you are likely to require additional capacity and time as social distancing requirements, by their nature, need more physical space per audience member and loading/organising the audience will be more complex. Some other aspects you will need to consider within you planning are;

---

[26] https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/performing-arts
[27] https://www.gov.scot/publications/coronavirus-covid-19-guidance-for-the-performing-arts-and-venues-sector/

- Consider contactless ticketing and removing cloakroom facilities.
- Consider grouping of households/people within the audience so they are in line with the latest applicable government guidelines and limiting capacity.
- Designated seating with adequate separation between individuals (or, where relevant, household groups) rather than allowing them to stand (to maintain social distancing)
- Take steps to prevent or mitigate the risk of any activities (including involving any audience) which create aerosol (e.g. shouting, chanting and singing along).
- Provide good rates of ventilation through use of mechanical systems and opening doors and windows.
- Provide plentiful hand hygiene facilities and associated information on good hygiene practices.
- Put in place emergency procedures such as evacuation whilst managing the COVID risk.
- Gather contact details from any audience, to be provided to NHS Test and Trace if requested.
- Ensure audience members wear a face covering in line with government regulations[28] relating to the wearing of face coverings and consider how these will be used (in line with latest government requirements). The regulations in Scotland can be found here[29].

What to do if someone displays symptoms

If someone displays symptoms of coronavirus (or if someone in their household displays symptoms) they should self isolate as soon as possible for at least 10 days. If they are at work they should return home directly, and order a test online[30]. If they don't have access to the internet, a test can be ordered by calling 119 (in England, Wales and Northern Ireland) or 0300 303 2713 (in Scotland).

What to do if someone informs you of a positive test

If someone informs you they have had a positive coronavirus test result you should confirm that they are following the latest government advice. At the date of this guidance note update, this is:
- *If you get a positive result, you and anyone you live with must self-isolate.*
- *If you have symptoms, self-isolate for at least 10 days from when your symptoms started. Anyone you live with who does not have symptoms must self-isolate for 10 days from the date of contact with you.*

Anyone who has been in close contact with a person who tests positive for coronavirus during the 48 hours prior to symptoms developing and in the time since symptoms developed should be asked to self-isolate for 10[31] days. Close contact is defined in guidance[32], accurate at the time of this update guidance, as;

---

[28] The Health Protection (Coronavirus, Wearing of Face Coverings in a Relevant Place) Regulations 2020 - https://www.legislation.gov.uk/uksi/2020/791/contents/made
[29] The Health Protection (Coronavirus) (Restrictions and Requirements) (Scotland) Regulations 2020 - https://www.legislation.gov.uk/ssi/2020/279/part/4/made
[30] https://www.nhs.uk/conditions/coronavirus-covid-19/testing-and-tracing/get-a-test-to-check-if-you-have-coronavirus/
[31] https://www.gov.uk/government/news/uk-chief-medical-officers-statement-on-the-self-isolation-period-11-december-2020
[32] https://www.gov.uk/government/publications/guidance-for-contacts-of-people-with-possible-or-confirmed-coronavirus-covid-19-infection-who-do-not-live-with-the-person/guidance-for-contacts-of-people-with-possible-or-confirmed-coronavirus-covid-19-infection-who-do-not-live-with-the-person#what-is-meant-by-a-contact

- anyone who lives in the same household as someone with COVID-19 symptoms or who has tested positive for COVID-19
- anyone who has had any of the following types of contact with someone who has tested positive for COVID-19 with a PCR test:
  - face-to-face contact including being coughed on or having a face-to-face conversation within one metre
  - been within one metre for one minute or longer without face-to-face contact
  - sexual contacts
  - been within 2 metres of someone for more than 15 minutes (either as a one-off contact, or added up together over one day)
  - travelled in the same vehicle or a plane

Close contact will be managed out of most production environments through the risk assessment process detailed in this guidance and will be recorded within your risk assessment. You should ensure that you have documentation to identify individuals who have come into close contact with others in the course of activity in the workplace. To support accurate and effective tracing of close contacts it may be advisable for you to request that any production member discusses with you the appropriate information for those tracing to act upon and what information should be supplied to the relevant tracing bodies. You should also consider any potential data privacy issues this may involve.

You should ensure, at all times, that anyone who is tested positive is able to highlight to you any situations where the existing risk assessment doesn't completely reflect who they had come into close contact with on the production during this period and be comfortable to raise this so that the risk assessment can be reviewed by you and accurate information provided to those tracing.

Further public health guidance for Scotland can be found [here](#)[33].

Additional requirements in the event of multiple cases in the workplace

In England, your obligation to report cases of COVID-19 in the workplace will depend on the requirements set out in any relevant 'Action Card' [34]). If you need to report, you should contact your local health protection team from Public Health England to report the suspected outbreak ([find your local team](#)[35]).

In Scotland[36], you will need to contact Health Protection Scotland if you have two or more cases of COVID-19 in the workplace within a 14 day period, or (in Scotland) an increase in staff absence rates, in a setting, due to suspected or confirmed cases of COVID-19. Local team contacts in Scotland can be found [here](#)[37].

---

[33] https://www.gov.scot/publications/coronavirus-covid-19-test-and-protect/pages/advice-for-employers/
[34] https://www.gov.uk/government/publications/reporting-outbreaks-of-coronavirus-covid-19/covid-19-early-outbreak-management
[35] https://www.gov.uk/health-protection-team
[36] https://www.gov.scot/publications/coronavirus-covid-19-general-guidance-for-safer-workplaces/pages/workforce-planning-and-support/
[37] https://www.hps.scot.nhs.uk/about-us/contact-us/health-protection-team-contacts/

There is not specific guidance in Wales[38] or N Ireland[39] about requirements for reporting to Public Health Wales/ Public Health Agency. but employers are advised that if multiple coronavirus cases appear in a workplace (identified through Test, Trace and Protect/ Test and Trace) that an outbreak team may contact you from Public Health Wales or the Public Health Agency in N Ireland. In the event that you have a number of cases within your workplace (in the same way as in the other nations), it is recommended that you contact Public Health who can assist in supporting you.

3.   Reduce the number of people involved

This is a key control to managing the risk and should be considered before a more detailed risk assessment, key considerations should be;

- Minimise workers needed on site to complete the work activity.
- Maximise technology to enable roles and activities to be done from home and remotely wherever possible.
- Segregate people within the working area to avoid close contact, maintain social distancing and minimise mixing as far as possible.

Note:

Any roles that are key to ensuring safety during specific higher risk on set activity should be considered essential to that activity taking place, these should be specified in the risk assessments for the higher risk activities (such as stunts or SFX).

There are specific groups of people that may need access to a set including trade union representatives and essential visits of agents or professional advisors. Visits should be made in line with the safety measures introduced for the location.

Any overall reduction in people should not have a negative impact on other, non-Coronavirus (COVID-19) safety related, aspects of the production.

4.   Consider editorial 'on camera' requirements

A key risk to consider is how the creative and editorial requirements of the production are met and agreed with Commissioning Networks within the parameters of the current restrictions. Key considerations should be;

- Changes to script and scenes to take into account social distancing.
- Changes to set to take into account social distancing.
- Use of 'green screens' and 'down the line' to support minimising numbers on production.
- Scripts should be provided as early as possible to support with planning.
- Directors and other relevant roles may need to be brought on earlier in the planning and prep for production to establish what is required to deliver the production within the restrictions of managing the COVID-19 risk.

Where provisions introduced to manage the risks of COVID-19 result in additional requirements being placed on cast outside of their engagement period, these should be discussed fully beforehand.

---

[38] https://gov.wales/keep-wales-safe-work-html
[39] https://www.publichealth.hscni.net/sites/default/files/2020-09/CTS%20flowchart%20for%20business_0.pdf

Where children are a key part of a production, remember that all relevant child safeguarding measures still apply and that performance licensing requirements are still enforceable.

If you are filming within a household with children present you should consider both COVID-19 risks and usual risk considerations associated with working with children (including safeguarding) as part of your assessment process.

Due to the unique circumstances in managing the COVID-19 risk in production and the complexity of maintaining social distancing rules, when considering the limits to people permitted on set, you may still need to allow parents or guardians to accompany children and perform the role of a chaperone. This allows parents to assist with other aspects of preparing children and maintaining the correct social distance with someone from their household, which can include hair, makeup and clothing - perhaps under tutorial when required. If parents do fulfil this role, the safeguarding planning must be part of the risk management process and would normally include being briefed in a similar way to chaperones.

5.   Mental health and wellbeing

It is important to remember that the COVID-19 pandemic poses significant challenges to people's mental health and wellbeing. Those having to work from home may experience social isolation while those having to come to a studio or location may be fearful of the risk of becoming infected. It is therefore essential that overall wellbeing and mental health are considered within the risk assessment for production and that those responsible understand the wellbeing needs and requirements of their teams.

The support offered across productions should be identified and communicated clearly and regularly throughout the production. This may range from a peer to peer model through to appropriate helplines and/or online platforms.

Within the UK, the Film and TV Charity is committed to supporting the film and TV workforce in returning to production after COVID-19 and provides many useful resources for production along with support routes for the workforce.

6.   Feedback loop

It is important to ensure there that production teams are reporting any shortfalls (and successes/lessons) to ensure the risk assessment process is effective and actively reviewed.

On a production basis it is important to have a clear procedure for raising concerns, you should also consider if an explicit commitment that no one will be sanctioned for refusing to work in an unsafe environment would support people in raising concerns.

Coronavirus (COVID-19) - Risk Assessment Guidance

Areas to consider and controls

Key areas to consider within the COVID-19 risk assessments for production are detailed below, controls outlined are identified in line with a controls' hierarchy (with the most effective being physical controls and the least those that rely on people's behaviour).

1.   Travel

Minimise travel and apply social distancing principles when planning travel arrangements, controls to consider are;

Physical
- Consider digital or technical alternatives which eliminate (as a first point) or if that is not reasonably possible, minimise, the need for travel outside the home.
- Try to use local crew and contributors to help minimise the need for travel.
- Avoid using public transport where possible.
- Use single occupancy vehicles where possible but don't forget to assess risk from tiredness/fatigue of those driving home.
- Where multiple occupancy/ vehicle sharing is unavoidable, ensure seating positions, vehicle ventilation and face coverings are employed to minimise transmission risks.

Planning
- If public transport has to be used try to schedule people so they are travelling at quieter times of day but don't forget the personal safety risks.
- If more people will be driving to the workplace than normal consider if you have appropriate parking facilities available.
- For any international travel you should ensure that you plan for adherence to local requirements and quarantine restrictions, both out and inbound.

People
- Face coverings must be worn for the full duration of journeys on public or shared transport (including taxis and ride-sharing operators).
- Wash or sanitise hands before and after using any public transport, including taxi or shared vehicle.
- Wipe down vehicle touchpoints.

2.   Location

Consider the physical capacity of the space given the requirements of social distancing along with the provision of key hygiene facilities, risks you may be introducing to others who already occupy the space and cleaning of the premises prior to and during occupation controls to consider are;

Physical
- Outdoor filming is preferable (although ideally not in a public space).
- General ventilation
  - Good ventilation reduces the risk of spreading coronavirus, so focus on improving general ventilation, by opening windows/ doors (unless fire doors) and adjusting mechanical systems.
  - The requirement is for fresh air, so simply recirculating stale air in a space is inadequate.
  - Try to eliminate pockets of stagnant air in occupied spaces. You can do this by using ceiling fans or desk fans to supplement a good supply of general fresh air ventilation.
  - Where the provision of good external ventilation is impractical, high efficiency air filtration units may be considered. Careful consideration must be given to the number and power of units required to achieve adequate levels of filtration for the space involved.
- Air conditioning
  - The risk of air conditioning spreading coronavirus (COVID-19) in the workplace is extremely low and is greatly outweighed by the benefits of increased ventilation with fresh air.
  - The standard recommended ventilation rate for office type accommodation is 6 air changes per hour. In the context of the more infectious VOC 2020 12/01 variant, consideration should be given to increasing rates to 9 or 10 air changes per hour where systems are capable of achieving that rate[40].
  - You can continue using most types of air conditioning system as normal. But, if you use a centralised ventilation system that removes and circulates air to different rooms it is recommended that you turn off recirculation and use a fresh air supply.
  - You do not need to adjust air conditioning systems that mix some of the extracted air with fresh air and return it to the room as this increases the fresh air ventilation rate.
  - Portable units operate on 100% recirculation and should only be used to improve air movement in spaces with a good supply of fresh air.
  - If you're unsure, ask the advice of your heating ventilation and air conditioning (HVAC) engineer or adviser.

- You should ensure that you can demonstrate that you have put in place all reasonably practicable measures (as per this and other applicable guidance) to maintain a 2m separation between people in the workplace. Where 2m cannot be achieved, consideration should first be given to reasonably practicable alternatives including redesigning the activity to allow for 2m separation. If that is not possible then the use of physical barriers should be considered and, if that is not possible, then careful consideration on whether alternative protections will

---

[40] See para 12 of https://www.gov.uk/government/publications/emgspi-btweg-mitigations-to-reduce-transmission-of-the-new-variant-sars-cov-2-virus-22-december-2020

guard against transmission risk sufficiently to justify any reduction in 2m separation. These considerations and your conclusions must be recorded in your risk assessment. Where social distancing guidelines cannot be followed and the activity is essential (e.g. on screen drama) then all mitigating actions possible need to be taken to reduce the risk of transmission (guidance can be found in the Close Contact Cohort industry protocol).

- Physically maintaining 2m separation between individuals would require 4m² per person in a clear space or 6m² in a space with furniture or equipment. Taking these figures, a large 15,000 sq ft (1380m²) stage with could accommodate c230 people while a smaller set of 4,500 sq ft (400m²) could hold c60.
- Have large enough areas for crew 'holding' to enable alternating teams in the working area.
- If you are using location vehicles where the physical footprint of the vehicle doesn't allow for the maintenance of 2m social distancing, you must make all adjustments which are reasonably practicable to reduce the risk of viral transmission. Considerations should include but are not limited to limiting the number of people in a vehicle to allow for the greatest separation possible (e.g. different seat rows/ space between), physical barriers in the vehicle, maximising ventilation by keeping windows open and introducing other appropriate measures such as those detailed in the work activity section (including the mandatory wearing of face coverings).
- If households are being used as filming locations (presenters' homes for example) consideration must be given to the risks being introduced to these environments, through the introduction of any equipment or additional people for example.
- Frequently clean and disinfect objects and surfaces that are touched regularly, using your standard cleaning products.
- Make sure there are places to wash hands for 20 seconds with soap and warm water and/or sanitiser stations as appropriate.
- Ensure that any sanitiser gel is effective (minimum 60% alcohol gel).
- Face coverings must be used routinely to minimise the risk of transmission, unless there are good reasons that they cannot be worn.
- If you are filming at a location/facility you should confirm appropriate cleaning arrangements prior to gaining access and regular cleaning provision whilst you are on site, [cleaning guidance](https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings)[41] is on the government website.
- If you are planning on filming overseas you will need to consider travel, accommodation and healthcare availability and will need to seek support from your health and safety advisor.

Planning
- Use floor markings to mark the 2m distance, particularly in busier areas.
- Institute one-way routes to reduce the risk of people crossing or clustering - e.g. staircases may be designated as only up or down and marked as such.
- When planning entry/exit routes ensure you also consider emergency access/exits and if one-way routes would apply in these circumstances.
- Identify specific roles/responsibilities to reinforce key messages around hygiene and social distancing. Such as individuals nominated on the crew to regularly remind and reinforce key messages on the requirement to remain 2m apart and measures that have to be followed on set to achieve this (one-way routes, where to occupy at rest times etc).

---

[41] https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings

- Provide appropriate signs and messaging to reinforce key hygiene and distancing messages; this may include daily crew briefings for example.
- Provide appropriate signs and messaging on symptoms of Coronavirus (COVID-19) and when not to come into work, these should be reinforced in appropriate locations.
- If you are filming in spaces the public can access clearly mark filming areas and provide information on any restrictions in place, such as numbers of people in the area, at entrance/exit points.
- For small crews filming on location in public spaces consider the need to discourage members of the public from gathering to watch and an appropriate way of achieving this.

People

- Make sure people are instructed and monitored in adhering to good practice for infection control:
    - Social distancing.
    - Hand hygiene.
    - Use of face coverings and masks.
    - Not touching the face as much as possible and wash/sanitise hands if face is touched.
    - Minimising the passing around of objects or documents by placing them down so they can be cleaned and picked up by the person they are being passed to.
    - Minimising the touching of shared surfaces (e.g. door-handles, keyboards, table-tops, etc.) and wiping them down regularly.
    - Forms can be placed in a cleanable plastic wallet.
- Encourage people to move to other holding areas rather than occupying areas that are directly adjacent to filming activity where they would traditionally be on 'standby'.
- If members of the public do gather to watch, if necessary stop filming and wait for the public to disperse.

3.   Work Activities

Consider the activities that people are going to need to undertake across roles on production, and if these can be adapted or changed to reduce risk, controls to consider are;

Physical

- Plan the production to maintain a 2m separation rule between all individuals – e.g. separating presenters/ contributors on set. Where the maintenance of 2m social distancing cannot be achieved, you must make all adjustments which are reasonably practicable to reduce the risk of viral transmission. Considerations should include but are not limited to redesigning the activity to allow for 2m separation, limiting the number of people involved further, If that is not possible then the use of physical barriers should be considered and, if that is not possible, then careful consideration on whether alternative protections will guard against transmission risk sufficiently to justify any reduction in 2m separation. These considerations and your conclusions must be recorded in your risk assessment.. Where social distancing guidelines cannot be followed and the activity is essential (e.g. on screen drama) then all mitigating actions possible need to be taken to reduce the risk of transmission (guidelines can be found in the Close Contact Cohort industry protocol).
- Use boom or fixed microphones to avoid contact and maintain 2m distance.
- Where radio mics are required establish a protocol for cleaning prior to issue and on return along with instructions on how the presenter/contributor can fit the mic themselves.
- Consider use of a natural barrier within the set or location (e.g. windows, glass door), between people.
- Consider introducing barriers such as plexiglass to separate people close to each other for longer periods of time; these may be most suitable in a location vehicle or edit suite but consideration should be given to their effectiveness and expert advice may need to be sought.
- Review and modify set design to reduce the requirement for close working and time to rig.
- Utilise all available studio space to reduce turn around and use another studio (if available) to avoid moving kit/ scenery etc unnecessarily.
- Script action wherever possible to enable the 2m separation rule to be applied. Where this is not possible, set out justifications for a reduction to 1m in your risk assessment and provide additional measures (as per any applicable guidance) to reduce transmission risk.
- Enable people to do their own makeup or by remote instruction wherever possible. Any provision of makeup activities by others must be in line with government guidance for Close Contact Services.
- Limit or curtail any on set touch-ups of makeup. If on set touch-ups are required, they should be undertaken in line with Government guidance for Close Contact Services.
- Aim to self mic as much as possible.
- Don't directly handover outfits from wardrobe to actors/presenters.
- Consider individual storage for props and storage where they are limited to the individual using them.
- Consider the digital provision of scripts and any associated training needs.

Planning

- Introduce staggered start times particularly on prep/rigging days.
- Consider purchasing make up and sending directly to an individual and it remains with the individual – utilising social distancing if applied on set.
- Apply the measures described in the government's Close Contact Services guidance for hair and make-up functions including any necessary PPE.

- Consider separate monitors for those that need them or if limited – a system of rotation to maintain social distancing.
- Where the maintenance of 2m social distancing cannot be achieved, you must make all adjustments which are reasonably practicable to reduce the risk of viral transmission. Considerations should include but are not limited to redesigning the activity to allow for 2m separation, limiting the number of people involved further, If that is not possible then the use of physical barriers should be considered and, if that is not possible, then careful consideration on whether alternative protections will guard against transmission risk sufficiently to justify any reduction in 2m separation. These considerations and your conclusions must be recorded in your risk assessment.. Where social distancing guidelines cannot be followed and the activity is essential.
- Where face-to-face contact is essential expert advice may need to be sought about how to manage the risk.
- All reasonable steps should be taken to ensure that a distance of two metres is maintained but where this is not practicable, relevant guidance, including the 'Close Contact Services'[42] guidance and the Close Contact Cohorts protocol[43], exist. Any such activity should only be done for the shortest time possible and when all other mitigations have been considered and discounted as appropriate for the situation. Consideration will also need to be given to the precise wording of regulations in the specific country as to what is permitted. Such measures are likely to be complicated to introduce; expert H&S and medical advice will need to be sought, any relevant industry or medical protocols should be considered, a detailed production specific risk assessment will be required and there will need to be effective consultation with those individuals involved.

People
- Follow good hygiene practices within all work activities and at all times.

4.   Work Equipment

Work equipment is key to TV production from cameras and headsets to edit suites. Good hygiene and managing potential issue with touchpoints should be addressed, controls to consider are;

Physical
- Where possible people should have dedicated work equipment.
- Personal equipment (headsets, mics, radios etc.) should be cleaned and disinfected before issue and then each day.
- Where radio mics are required establish a protocol for cleaning prior to issue and on return along with instructions on how the presenter/contributor can fit the mic themselves.

Planning
- Put in place enough easily accessible appropriate cleaning equipment for use throughout the day, particularly in shared areas such as welfare facilities and at the entrance and exit of any set/ location area.

People
- Wipe down equipment within workspaces, at the beginning and end of a shift/work session, or if space/equipment is passed between users.
- Keep non-work critical items in the workspace to a minimum.

---

[42] https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/close-contact-services
[43] http://downloads.bbc.co.uk/safety/documents/health/covid19-close-contact-cohorts.pdf

5.   Work Patterns

Additional precautions to manage the COVID-19 risk could lead to increased prep and overall production time. There will be deadline pressures and a foreseeable temptation to stretch the 'camera hours' and the working day to deliver, this must be considered and addressed within the production culture from initial briefings to day to day reinforcement of key messages. Whilst many will be keen to return to work, many others will be anxious and concerned about health risks from COVID-19. Consideration of the impact of this on production teams should be factored into the working schedules which may impact the length of working day deemed appropriate at this time. Work patterns may also enable you to have small groups (cohorts) of people who don't come into contact with other groups and this should be a planning consideration

Planning

- As much as possible, keep teams of workers together (cohorting), and keep teams as small as possible.
- Stagger lunch breaks etc. to reduce numbers (see section on rest areas).
- Where different cohorts are required to meet, social distancing must be maintained in line with the guidance set out in the preceding sections.
- Staggering arrivals and departures to locations of departments or individuals should be considered to help manage social distancing.

6.   Rest Areas

Rest areas are very important but may need some reconfiguration and planning around breaks to ensure rest areas are as safe as possible, controls to consider are;

Physical

- Consider adapting layout to encourage people to sit apart.
- Water/coffee dispensing - increased cleaning will be required.
- Crockery, eating utensils, cups, etc. should not be cleared/cleaned by others; this can be achieved by bringing items from home which the owner would be responsible for cleaning and ensuring they were identifiable. Alternatively, disposable items may be provided (disposal arrangements should be established). The environmental impact should also be considered within the decision on how to approach this. If neither of these is achievable a protocol and cleaning regime would need to consider the risks to those providing these services.
- Provide easy access to handwashing/sanitiser facilities within rest areas to encourage regular use especially where people are eating.
- Consider provisioning sanitising wipes outside restrooms so individuals can wipe on the way in to support regular cleaning.
- Any food or beverages supplied should, where possible, be pre-packed. If on-site catering is essential the Government guidance for food businesses[44]. should be adhered to strictly. For Scotland, please see food sector guidance here[45].

Planning

- Schedule breaks to keep occupancy levels as low as possible.

---

[44] https://www.gov.uk/government/publications/covid-19-guidance-for-food-businesses/guidance-for-food-businesses-on-coronavirus-covid-19

[45] https://www.foodstandards.gov.scot/publications-and-research/publications/covid-19-guidance-for-food-business-operators-and-their-employees

- Provide clear signage and advice on maintaining good hygiene and other precautions.
- Restrict numbers of people in toilets at the same time and arrange for regular cleaning of facilities.

People
- Encourage people to put rubbish directly into the bin to reduce the need for cleaning up.

7. First Aid and Emergency Services

Consider that emergency services are under great pressure so may not be able to respond as quickly as possible alongside this Coronavirus (COIVD-19) poses a potential risk to first aiders, controls to consider are;

Physical
- Consider increasing on set medical equipment to deal, in the first instance, with an emergency.
- First aid boxes should be checked regularly to make sure that they are fully stocked and, where possible, they should include resuscitation face shields.

Planning
- Consider if it is appropriate to increase healthcare staffing provision on the Production whilst the Coronavirus (COVID-19) risk is present.
- Consider the scheduling of higher risk scenes such as those with stunts and SFX and potentials demands on emergency services.
- Ensure first aiders are briefed to check the latest Government guidance on cardiopulmonary resuscitation.[46]

People
- Consideration should be given as to whether first aiders are still comfortable with their role in an emergency and, if not, appropriate alternative provision should be made.

8. Face Coverings and Personal Protective Equipment (PPE)

Face Coverings *(protecting others)*

Face coverings provide some protection to the wearer from infected droplets and aerosols but their primary use is for reducing the likelihood of passing on the virus to others when the wearer is pre-symptomatic or asymptomatic. This "community protection" is only effective if the majority of individuals within the 'community' are using face coverings. Face coverings are different to respirator masks provided as personal protective equipment for people operation in high risk environments (see below).

Many jurisdictions now mandate the wearing of face coverings for community protection in various settings and some stipulate the type of face covering that must be worn. Guidance on specific requirements is available from your health and safety advisors. Even where the use of face coverings is not a legal requirement it may still constitute good practice and many employers are asking their people to wear them at work to protect colleagues and others they may come into contact with.

---

[46] https://www.gov.uk/government/publications/novel-coronavirus-2019-ncov-interim-guidance-for-first-responders/interim-guidance-for-first-responders-and-others-in-close-contact-with-symptomatic-people-with-potential-2019-ncov

Current rules are that face coverings must be worn in a number of indoor settings, including on all public transport, in transport hubs, shops and supermarkets, shopping centres, visitor attractions etc. The latest relevant Government requirements and guidance[47] on when and where face coverings should be used should be reviewed as part of the risk assessment. Cast and crew working on location must wear face coverings in line with these requirements, aside from exceptional circumstances such as a physical or mental health condition or if it negatively impacts on the wearer's ability to do their job, for example performers when they are on camera or in rehearsal.

Different rules exist in different parts of the UK about which you can find out more on the relevant websites for each nation:
- Northern Ireland [48]
- Scotland [49]
- Wales [50]

An effective face covering consists of three layers of fabric – outer and inner layers are usually a natural material like cotton and a synthetic material middle layer provides optimum filtration. It should be secured to the head with ties or ear loops and fit comfortably over the nose and mouth, both of which should be covered. Face visors are not an acceptable alternative to face coverings (unless an individual has a medical reason for exemption) because they offer very little protection to others from the wearer – they have a limited use as personal protection when used with a face covering (see below). Unless disposable, face coverings should be washed regularly and kept clean. There are currently no UK standards for face coverings but the specification published by the British Retail Consortium[51] represents good practice and should form the basis for any items procured for a production.

Personal Protective Equipment (PPE) (*protecting yourself*)
Use of PPE is very much a last resort and should only be considered when all other forms of control have been considered and/or implemented. It would not in general be appropriate to source medical grade PPE except in very limited circumstances, such as when filming in higher COVID-19 risk settings like hospitals which would only be at the invitation of the relevant authorities.

Other forms of PPE may be required where government guidance suggests this could be needed (e.g. Close Contact Services including hair and make-up). Determining what constitutes appropriate PPE in a given circumstance is complex and advice should always be sought from your health and safety advisor.

All PPE needs to be put on, taken off and disposed of correctly.

---

[47] https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own
[48] https://www.nidirect.gov.uk/articles/coronavirus-covid-19-face-coverings
[49] https://www.gov.scot/publications/coronavirus-covid-19-phase-3-staying-safe-and-protecting-others/pages/face-coverings/
[50] https://gov.wales/face-coverings-guidance-public
[51] https://brc.org.uk/media/674992/face-coverings_guidelines_v2.pdf

Masks and visors

Masks and visors may be required for close contact work (hairdressing and makeup for example) for the person providing a service (such as hairdressers or beauticians), because of the period of time spent in close proximity to a person's face, mouth and nose. Current guidance is that this should take the form of a clear visor <u>and</u> a Type II face mask.

Clear visors cover the face (and typically provides a barrier between the wearer and the client from respiratory droplets caused by sneezing, coughing or speaking). Visors must fit the user and be worn properly. They should cover the forehead, extend below the chin, and wrap around the side of the face. Both disposable and re-usable visors are available. A re-usable visor must be cleaned and disinfected between each client using normal cleaning products.

A Type II face mask should be worn with the visor. Type II face masks are not PPE but will provide a physical barrier to minimise contamination of the mouth and nose when used correctly.

Further information can be found in the government's Close Contact Services guidance[52]. Further information for close contact services in Scotland can be found here[53].

Clinical grade PPE may be required when filming in higher risk settings such as hospitals and in such situations, guidance should be sought from the host institution on appropriate provision, protocols and training.

<u>Gloves</u>

On average you touch your face about 20 times an hour. If you touch your face with a gloved hand you could still transmit the virus. If wearing gloves, these should be washed, or removed and replaced, as frequently as you would wash your hands and should not be used in lieu of good hygiene practice.

---

[52] https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/close-contact-services#close-contact-6-1-new
[53] https://www.gov.scot/publications/coronavirus-covid-19-retail-sector-guidance/pages/close-contact-services/

Other PPE

Other types of personal equipment may be required for protection against COVID-19. The virus can enter the body through the eyes as well as the nose and mouth so face shields may be appropriate. Aprons or gowns may be considered where there is felt to be a risk of clothing becoming contaminated.

9. Mental Health

The COVID-19 risk and the response has had a potential Mental Health impact for those working on your productions, key things to consider in managing this are;

Physical

- Provide spaces for people to 'rest' and have down time during the working day as much as possible.

Planning

- This may be informed by the HSE's Stress Management Standards[54] which cover six key areas of work design that, if not properly managed, are associated with poor health, lower productivity and increased accident and sickness absence rates.
- Consider what access production teams have to mental health support.

People

- Ensure people are aware of routes to support (such as an Employee Assistance Programme).
- Increase overall awareness of personal challenges at home and work at this time.
- Consider the overall level of fatigue in cast/crew through adapting scheduling patterns.
- Be transparent with plans to manage the COVID-19 risks on production and provide the opportunity for people to raise questions.
- **Note:** One route to support for the UK Film and TV industry is the Film & TV Charity[55]

---

[54] https://www.hse.gov.uk/stress/standards/
[55] https://filmtvcharity.org.uk/

Organisations and individuals consulted in the course of drawing up these guidelines:

- First Option
- Health and Safety Executive
- The Film & TV Charity
- Equity
- Bectu
- Northern Ireland Screen
- Creative Wales (Department for Culture, Sport and Tourism, Welsh Government)
- Scottish Government
- Creative Scotland
- Directors UK
- Unite
- British Film Commission
- British Film Institute
- Dr Paul Litchfield CBE
- Mary Lawrence, Partner, Osborne Clarke LLP