TV Production Guidance:

Managing the risk of Coronavirus (COVID-19) in production making
(Version 1)

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

Under this guidance:

Producers will need to:
- complete suitable and sufficient risk assessment about Coronavirus (COVID-19) risks for their activities,
- record how they are managing significant Coronavirus (COVID-19) risks in a COVID-19 risk assessment document,
- engage with their workforce (and any 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),
- displaying information 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 both basic requirements and key areas to consider and controls. The latest government guidance and information can be found on the GOV.UK 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 which should be 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.

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

These guidelines are based on the practical application, within a TV production setting, of the latest Public Health England (PHE) guidance; other restrictions may apply in Scotland, Wales, Northern Ireland, the Channel Islands and the Isle of Man. The HSE will consider PHE 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 companies, but clearly in each individual case the production company would need to be cognisant of any nation specific restrictions.

Can we still produce TV in the UK?
TV production activity is not specifically required to stop and neither is its operation restricted by law under the applicable Coronavirus legislation, The Coronavirus Act 2020 (other than in relation to any workplace canteen). Restrictions that are applicable are those that require people to stay at home and only leave for a number of stipulated reasons, one of which is work (but only if it cannot be done from home). It should be noted that 'work' may not include individuals involved in production making who might not be considered to be working (e.g. game show contestants, unpaid contributors, etc) you should seek appropriate advice on interpretation of this specific legal requirement if these people are key to your content. The restrictions limit gatherings of more than 2 people in a public place. There is an exception 'where the gathering is essential for work purposes'.

In many circumstances' TV production cannot be wholly achieved by people working from home and therefore the principles of health and safety legislation and risk assessment should be applied to manage the Coronavirus (COVID-19) risk, taking the PHE guidance into account when doing so.

Planning for the management of the Coronavirus (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 Coronavirus (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 Coronavirus (COVID-19) risk management plan.

In certain circumstances workplace COVID-19 infections are reportable under RIDDOR https://www.hse.gov.uk/news/riddor-reporting-coronavirus.htm these requirements should be considered within production protocols.

In applying this guidance, employers should be mindful of the particular needs of different groups of workers or individuals. It is breaking the law to discriminate, directly or indirectly, against anyone because of a protected characteristic such as age, sex or disability. Employers also have particular responsibilities towards disabled workers and those who are new or expectant mothers.

Coronavirus (COVID-19) - Risk Assessment Guidance

Basic requirements
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

Coronavirus (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 vulnerable groups, or live in a household where people are in the clinically extremely vulnerable category 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 anyone who is clinically extremely vulnerable or at increased risk as they are in a clinically vulnerable group from the illness. Those in the clinically extremely vulnerable category should remain in their homes and not be coming to a place of work. For anyone at increased risk who is unsure if they need to remain at home for health reasons, you should discuss their participation with them in the context of advice from their own health professionals and, if appropriate, any company medical advisor.

2.   Heighten precautions for everyone at work

It is essential that everyone involved with the production applies good practice in terms of social distancing and hand hygiene. Good practice is to: 'Wash your hands more often for 20 seconds. 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, 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.

If someone develops symptoms whilst at work they should go home immediately and inform their line manager. Avoid contact with people who have symptoms. If the person is then tested positive for COVID-19 it is important that those who have been in close contact with them in the workplace are informed in the most appropriate way possible and given appropriate advice (in most cases what to do if they become unwell or develop symptoms).

This process must be completed taking due consideration of safeguarding appropriately personal data and information. Close contact can be defined as someone living in the same household, someone who had direct or physical contact with an infected person, or someone who has remained within two metres of the patient for longer than 15 minutes.

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.

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.

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 minimise close contact and maintain social distancing as far as possible.

Notes:
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 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' to '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.

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/learnings) 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 Coronavirus (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).

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1.   Travel

Try to minimise travel and follow social distancing principles within travel arrangements wherever possible, controls to consider are;

Physical
- 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.

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
- Wash 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), however if indoors aim for a large open space with good ventilation. Avoid small rooms where possible.
- Physically maintaining 2m separation between individuals implies 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 social distancing you should ensure you are minimising people and introducing other appropriate measures such as those detailed in the work activity section.
- 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 (60% alcohol gel).
- In some jurisdictions non-surgical face masks/coverings are required to manage the community spread of the virus. (Jersey for example).
- 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 can be found here (https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings).
- 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 the most crowded areas.
- One-way routes to minimise numbers - e.g. staircases will 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.
- Specific roles/responsibilities to support in reinforcing 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).

- Appropriate signs and messaging for key hygiene and distancing messages; this may include daily crew briefings for example.
- 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 area 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.
  - 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 maintaining a 2m separation rule between all individuals – e.g. separating presenters/ contributors on set.
- 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.
- Enable people to do their own makeup or by remote instruction.
- Limit or curtail any on set touch-ups of makeup.
- 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

- Staggered start times particularly on prep/rigging days.
- Consider purchasing make up and sending directly to an individual and it remains with the individual – instruction on application online prior to arrival on set / location or utilising social distancing if on set.
- Consider separate monitors for those that need them or if limited – a system of rotation to maintain social distancing.
- Where it is not possible to remain 2 metres apart and the activity needs to continue for the production to operate it should to be done side by side, or facing away from each other, rather than face to face if possible.
- Where face-to-face contact is essential expert advice may need to be sought about how to manage the risk.

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.

5.   Work Patterns

Additional precautions to manage the COVID-19 risk could inevitably 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 this is a planning consideration

Planning
- as much as possible, keep teams of workers together (cohorting), and keep teams as small as possible.
- Staggering lunch breaks etc. to reduce numbers (see section on rest areas).
- Where groups of cohorts meet social distancing must be maintained in line with the guidance set out in the preceding sections.
- Staggering arrivals and departures to locations via 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.
- Crockery, eating utensils, cups, etc. should not be required to be cleared/cleaned by others, this can be achieved by bringing them from home, the owner would be responsible for cleaning and ensuring they were identifiable. You can also provide disposable alternatives (disposal 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.
- Provision of 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.

- Consider appropriate provision and supply of food/beverages to adhere to social distancing requirements within both preparation and serving and minimising the need to pass directly from person to person.

Planning
- Schedule breaks to keep occupation levels as low as possible.
- Clear signage and advice on maintaining good hygiene and other precautions.
- Restrict numbers of people in toilets at any point in time and arrange for regular cleaning of facilities.

People
- People should 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
- On set medical provision increased to deal, in the first instance, with an emergency.

Planning
- Consider if it is appropriate to increase medical 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.
- First aid boxes should be checked regularly to make sure that they are fully stocked and, where possible, they should include resuscitation face shields.
- First aiders should all be briefed to check the latest Government guidance on cardiopulmonary resuscitation,
  [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]

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. Masks, Gloves and Other Personal Protective Equipment (PPE)

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. The very limited exceptions to this might be when filming in higher COVID-19 risk settings such as hospitals which would only be at the invitation of the relevant hospital authorities. 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.

Face Masks (& Shields)

● **Community Protection – Face Coverings** *(protecting others)*
For community protection the wearer is reducing the likelihood of passing on the virus to others - this is only effective if the majority of individuals within the 'community' are using masks.

Face coverings for community protection are one strategy that has been introduced in a number of territories, the specification for this purpose is different from those masks provided for personal protection, the latest advice will be available from your health and safety advisors.

In the UK current advice is;
If you can, wear a face covering in an enclosed space where social distancing isn't possible and where you will come into contact with people you do not normally meet. This is most relevant for short periods indoors in crowded areas, for example, on public transport or in some shops.

● **Personal Protection** *(protecting yourself)*
Face masks for personal protective equipment (PPE) should be specifically considered within an overall PPE plan, these should only be required when filming in higher risk settings such as hospitals, in such situations guidance should be sought from the host institution on appropriate provision, protocols and training

For personal protection the mask is there to protect the wearer from contracting the virus in higher risk settings and may need to be worn with a face shield and other PPE. It should be noted that the current PHE guidance is that the UK does not currently advise use of face masks outside of care settings.

To provide appropriate personal protection face masks, and all PPE, must be of the correct specification, FFP2 or above, fitted and worn correctly, changed frequently, removed properly and disposed of safely.

Gloves
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 practices and provision.

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

- Consider what access production teams have to mental health support.

People

- Ensuring 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.
- Consideration should be given to managing the overall level of fatigue in cast/crew through adapting scheduling patterns.
- Be transparent with plans to manage the COVID-19 risks on production.
- **Note:** One route to support for the UK Film and TV industry is the 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