

# COVID-19 Filming Guidance



# CHANNEL 4 COVID-19 FILMING GUIDANCE

THIS DOCUMENT IS FOR GUIDANCE ONLY AND IS NOT A SUBSTITUTE FOR PRODUCTION COMPANIES CARRYING OUT THEIR OWN RISK ASSESSMENT FOR SHOTS, FOR THEIR STAFF AND FOR THEIR CONTRIBUTORS.

Your filming plans and the measures you are taking to control the risks posed by COVID-19 must be reviewed and agreed in principle by Channel 4 prior to production commencing or restarting.

**NB: This guidance should be read in conjunction with the UK Government and NHS COVID-19 Guidelines current at the time of filming, as well as, where appropriate, the BFC and Joint Broadcaster/PACT guidelines.**

**The Channel 4 audience may expect any filming to have been carried out responsibly and in ways that do not increase risk for the public or jeopardise the work or the health of the emergency services.**

**Production personnel and contributors must never be pressurised or required to work in an environment where there is a risk of exposure to COVID-19 against their wishes.**

**Anyone displaying symptoms of COVID-19 must isolate immediately and be tested for the coronavirus according to NHS guidance.**

**This update includes changes relating to the United Kingdom Government's "Plan B" and revised Test and Trace guidance [see text in yellow highlight].**

**Version 9.0 - 16 December 2021.**

# INTRODUCTION

As restrictions for the general public have eased, the gap between what's permitted on productions and what's permitted socially has widened significantly. This is likely to mean that production staff are following different guidelines when at work than in their personal lives. Where applicable, we would appreciate it if you could remind teams that if during the production period they socialise together outside of work, or in down time if they are away on location, they must consider whether they should be socially distanced or wearing appropriate PPE. If they are required to socially distance for the production because they are in a Close Contact Cohort, they must continue to do so outside of work for the duration of the production period. Failure to do so causes a breach in production protocols. We appreciate that this can be frustrating, especially as the after work drink or a shared dinner on location is a natural extension to the working day, but we must continue to do all we can to keep staff safe and productions underway.

In addition to this, the requirements of Test and Trace and the requirement to self-isolate that may arise from close contact with a positive case, continue to generate production risk. If you can remind teams of this ongoing risk to production we would very much appreciate it.

We realise what a challenging time this remains for productions and thank you for your ongoing commitment and vigilance.

## 1: COVID-19 GUIDANCE OVERVIEW

Although many legal restrictions around COVID-19 have now been lifted for the public, legal obligations remain in place and new measures have been instigated to help combat the spread of COVID-19. Find out what the public can and cannot do [here](#).

**NB:** Government guidance referred to in this document primarily relates to filming in England. Within the four nations of the United Kingdom there are significant variations in COVID-19 guidance and regulations: producers operating in Scotland, Wales and Northern Ireland must check local restrictions and requirements, which may be more stringent than those in England, and incorporate them into their filming protocols.

For productions in Scotland, producers should also refer to the Scottish Government's *Coronavirus (COVID-19): guidance on film and TV production* found [here](#).

**Irrespective of government COVID-19 requirements for the general public, the coronavirus remains a significant hazard in the workplace and as such producers in the UK will continue to need to carry out COVID-19 risk assessments, putting in place the appropriate control measures in order to meet their legal health and safety obligations.**

**Please note:** Channel 4 does not "sign-off" COVID-19 protocols. It is the producer's responsibility to consider the risks posed by COVID-19 and other health and safety risks to their production and plan and prepare accordingly. The Channel reviews plans and comments on them, but sign-off comes from the producer and their health and safety advisors who have the professional competence and statutory responsibility to do so.

Producers should consider the following and reflect them in their COVID-19 protocols where appropriate. Protocols should use definite language and be location- and activity-specific, supported where necessary by additional COVID-19 and health and safety risk assessments (which must also be

reviewed in advance of filming or travel by Channel 4). **COVID-19 protocols and risk assessments are also required for casting, recces and research trips.**

**Please consider the following points carefully and incorporate them into your protocol where appropriate:**

1. Please indicate clearly at the top of your protocol in which nation(s) of the UK you will be filming.
2. Please colour highlight all changes when updating or editing your protocol and retain Channel 4 comments so that your replies can be tracked.
3. Please include a brief programme description in your protocol so that your plans can be considered in context. Please state whether this is a one-off production or extended series.
4. Please indicate if your shoot is socially-distanced, or if you will be bringing people into close contact (see below).
5. Please include an updated summary of the NHS-recognised symptoms of COVID-19. You may also find it helpful to include additional symptoms particularly associated with the Delta variant.
6. The template for team members' health declarations completed prior to production are to be reviewed by Channel 4. NB: COVID-19 status is considered to be 'special category' data under data protection legislation. See Appendix II, below.
7. Channel 4 is to be notified immediately of all suspected and confirmed COVID-19 infections.
8. Some people are more at risk of becoming seriously ill if they develop COVID-19 and specific consideration is required for these groups. Channel 4 is to be notified of all crew, cast and contributors at [high risk](#) from COVID-19 (formerly "Clinically Extremely Vulnerable") and of anyone who may have other COVID-19-relevant vulnerabilities in advance of filming. Please also be aware that being at high risk cannot be reason in and of itself to refuse a person's involvement as contributor or crew on your production. See also Section 4: Working With Disabled People, below.
9. Please state if you will be engaging a COVID-19 Supervisor. If you are not, please indicate whether a suitably-trained crew member will be designated COVID-19 Monitor – whose role it is to make sure all COVID-19 mitigations are strictly adhered to. If appropriate, this person may also fulfil another production role.
10. All members of production should be required to complete and record daily symptom checks before filming/production. NB: Temperature checks are now considered to be of little value because both sensitivity and specificity are extremely low.
11. All members of production must give informed consent to the provisions in the producer's COVID-19 protocol.
12. **VACCINATION**

Vaccination reduces the chances, but does not eliminate the risk, of people developing COVID-19, becoming seriously ill and passing on the virus. With the possible exception of self-

isolation exemptions for fully vaccinated individuals who have been in close contact with an infected person, there are currently no other exemptions or behavioural changes allowed for vaccinated individuals in a production environment.

### 13. VENTILATION

Ventilation is a core mitigation. Employers must provide adequate ventilation where people are in enclosed spaces. This can be natural ventilation (opening windows, doors and vents), mechanical ventilation (fans and ducts), or a combination of both. You can find more information in the section on ventilation and the HSE guidance on ventilation and air conditioning during the COVID-19 pandemic [here](#).

### 14. SOCIAL DISTANCING (OUTSIDE OF A CLOSE CONTACT COHORT)

Channel 4 expects that 2m social distancing will be adhered to during production and filming by production personnel unless there is an agreed editorial or practical necessity that would make it impossible.

Each individual circumstance should be assessed on its own merits, and appropriate anti-COVID-19 mitigations agreed with the production's health and safety advisors.

Ordinarily, when operating in furnished interior locations 6m<sup>2</sup> should be allowed per person in order to maintain 2m social distancing; in clear spaces, 4m<sup>2</sup> should be allowed.

Please note that under usual circumstances interaction between 1m to 2m is normally limited to 15 minutes cumulatively per 24 hours per person with facemasks being worn but that contact tracers will not consider the wearing of personal protective equipment (PPE) as a mitigation when assessing whether a recent contact is likely to have risked transmitting the virus.

Please make it clear if there are any foreseen circumstances where it would not be possible to maintain at least a 2m social distance and if so what mitigations will be put in place.

Please notify the Channel if you are planning on filming under 1m for any length of time.

**Re contributors:** producers and their health and safety advisors must assess the risk posed to contributors and apply appropriate controls. In scenarios where contributors have been brought together for the purposes of production, who therefore do not have an established, ongoing close contact relationship, Channel 4 expects 2m social-distancing to be maintained between them unless a Close Contact Cohort has been created (see below). In scenarios which are observational in nature (which should be discussed and agreed with Channel 4), or where there is a genuine, existing close contact relationship, social distancing measures would not necessarily apply to contributors. Individual scenarios should be risk assessed on a case by case basis.

### 15. AUDIENCES

Please notify the Channel if you are planning to film with a studio audience. The presence of an audience will need to be risk assessed and the risks posed to the audience members, to the crew and cast, and to production continuity considered. Where the production team needs to move around the audience the safest way to proceed (in terms of both health and production risk) is to maintain 2m social distancing for *everyone* in that area. Production personnel who

may come in close contact with members of the audience (for example, audience services) should not mix with the core production team. **It is now a legal requirement for non-contributory audience members over the age of 11 in England to wear a face-covering. Please see Appendix I for full details.**

## 16. MASKS & FACE COVERINGS:

Masks or face coverings (as appropriate) are usually to be worn indoors, in enclosed spaces, and outdoors when in proximity to others at all times by all production personnel except when on camera, eating, or sat at socially distanced desks or in areas with COVID-19 secure space dividers. There may be exceptions for individuals filming with members of their own household. Channel 4 is to be notified of exemptions.

**Re contributors:** producers and their health and safety advisors must assess the risk posed to contributors and apply appropriate controls. In scenarios where contributors have been brought together for the purposes of production, who therefore do not have an established, ongoing close contact relationship, Channel 4 expects masks or face coverings (as appropriate) to be worn as outlined above. In scenarios which are observational in nature (which should be discussed and agreed with Channel 4), or where there is a genuine, existing close contact relationship, mask-wearing would not necessarily apply to contributors, although **producers should be mindful of location-specific requirements and government regulations and guidance**. Individual scenarios should be risk assessed on a case by case basis.

**Gloves** are not usually recommended outside of specialist cleaning or healthcare scenarios.

## 17. CLOSE CONTACT COHORTS (CCCs) AND BUBBLES:

Most close contact work will require the creation and maintenance of a CCC or a Bubble.

Producers should note that the Joint Broadcasters/PACT guidance distinguishes between CCCs and Bubbles - and that Channel 4 may expect testing regimes for close contact work to resemble more closely those often associated with Bubbles than with CCCs.

See also *shared transport* and *hair and makeup artists*, below.

Please also refer to DCMS-approved industry guidance concerning the creation and maintenance of CCCs: *TV Production Guidance: Managing the risk of Coronavirus (COVID-19) in production making* (Version 7 – 08 September 2021), Annex A - *Alternative Options to Allow for Close Contact in TV Production, The Close Contact Cohorts Protocol ("CCC Protocol")*.

Certain tests for COVID-19 other than laboratory-standard PCR tests are acceptable for the creation and maintenance of CCCs.

If you are considering the use of an alternative to laboratory PCR testing please ensure that the technology you plan on using meets the desirable performance characteristics of the [Target Product Profile published by the MHRA](#) for SARS-CoV-2 detection tests. The rationale, including the independent verification of the test used, should be documented as part of the risk assessment and the principle to apply is that, taking all factors into account, **the level of protection offered is at least as good as that offered by a PCR based programme.**

Alternative tests must be discussed and agreed with Channel 4 in advance of production, and laboratory-standard PCR tests remain the Channel's preferred method of testing for COVID-19.

**Lateral Flow Tests must not be used to create or maintain Close Contact Cohorts.**

In order to help control risk to production continuity as well as risk to health, Channel 4 usually expects 2 x negative agreed COVID-19 tests to be taken a minimum of 96 hours apart before members of production come into close contact (with the second test taken as close to the start of close contact as possible), and for ongoing agreed COVID-19 testing to take place subject to the risk profile of production (a minimum of at least once every 7 days).

Producers should also consider additional agreed COVID-19 testing further out from filming to identify any crew, cast or contributors who may be infected and who may therefore not be able to participate. It is increasingly important that the pre-filming and filming period is governed by a strict and clearly detailed behavioural regime for all CCC members.

Consideration should be given to self-administered COVID-19 tests being monitored by an appropriate professional via a video call to ensure compliance.

In line with the Joint Broadcasters/PACT guidance, Channel 4 expects producers to limit the number of people in the CCC to the absolute minimum – with pairs being the optimum as each additional person adds significantly to health and production risk.

In the event that close contact happens as a result of a single PCR test the Channel expects that the test is taken extremely close to the point that close contact will occur so that close contact ends within 36 hours of the enabling test **taking place**.

The exit procedure for leaving a CCC and joining a new a CCC should involve a break of 48 hours and a new negative test before joining a new CCC, unless there is complete alignment between protocols and a COVID secure transfer can be assured. The alignment of protocols is to be confirmed by the producer's health and safety advisors and agreed by Channel 4.

As such, Channel 4 does not usually expect to see single-tested individuals mixing with established, multi-tested CCCs. **See also additional guidelines in Section 2, below.**

**18. SUSPECTED AND CONFIRMED INFECTED PERSONS PROTOCOL (SIPP):**

All productions will require a robust suspected and confirmed infected persons protocol.

For CCCs – including those created only for shared transport – the provisions of the SIPP will be different than for a socially distanced shoot.

If a suspected COVID-19 case arises during production, the suspected infected person must be returned to their place of self-isolation by COVID-19-secure transport, self-isolate immediately and take a PCR test.

In addition, all crew, cast and contributors who have been within the NHS/PHE definition of "close contact" with the **suspected** infected person (for example, other members of a close contact cohort, someone with whom a vehicle has been shared, etc) may also have to enter precautionary self-isolation or be excluded from production and, subject to advice, be required to take a PCR test.

(For example, crew members sharing accommodation must not be allowed to continue close contact.)

Channel 4 must be notified straight away.

The deep cleaning of potentially affected areas is to take place swiftly, as appropriate.

If the suspected infected person's PCR test is negative, production may resume subject to the individual's symptoms not triggering additional cause for concern.

If their PCR test is positive, they must continue to self-isolate as per government guidance (currently for at least 10 days from the onset of symptoms or from the test date if they are asymptomatic), and **everyone who has been in close contact with the infected person must also continue to self-isolate for up to 10 days** (depending upon their vaccination status and scenario-specific risk assessment) counted from their last close contact with the infected person.

In a production environment, the close contacts of a positive person should be PCR tested in addition (in England) to taking government-recommended daily lateral flow tests for 7 days. In the event that ongoing lateral flow testing returns a positive result, a confirmatory PCR test should be taken immediately.

Close contacts of a positive person who are not fully vaccinated in accordance with UK Government criteria are legally obliged to self-isolate for 10 days even if they return a negative result themselves.

NB: In the UK, the requirement to self-isolate for up to 10 days (dependent upon an individual's vaccination status and scenario-specific risk assessment) in the event of personnel coming within the government's definition of close contact with an infected person is not contingent upon personnel being contacted by Test and Trace. Quarantine should be assumed to be mandatory unless determined otherwise in conjunction with the relevant health authority.

## **Vaccination and Self-Isolation**

The regulations governing self-isolation for fully vaccinated individuals (who meet government criteria) following close contact with a positive case have changed in the UK. The following guidance applies primarily to [England](#). Producers operating in [Scotland](#), [Wales](#) and [Northern Ireland](#) should check local regulations which may be more stringent.

In England, anyone aged 5 years and over who has been identified as a [close] contact of someone with COVID-19 and who is not legally required to self-isolate is now strongly advised to take a rapid lateral flow test (LFT) test every day for 7 days or until 10 days since their last contact with the person who tested positive for COVID-19 if this is earlier.

If any of these lateral flow tests are positive, they should self-isolate in order to protect other people and take a confirmatory PCR test as soon as possible.

The public health advice for people with symptoms of, or a positive test result for COVID-19 remains the same for everyone.

In production, it remains the case that every incidence of close contact with an infected person should be risk assessed on a case by case basis irrespective of where close contact occurred, and, in consultation with Channel 4 and the producer's health and safety advisors, appropriate mitigations applied as necessary - which may include production-administered PCR testing (in addition to government-advised lateral flow testing) and a period of exclusion from production (particularly from Close Contact and Travel Cohorts) .

Given that the time interval from exposure to the Delta variant of COVID-19 to a positive PCR test being triggered ranges from approximately three to five days (and given that the exact latency and incubation periods for the Omicron variant remain unknown), very careful consideration should be given to how long after an individual's last known close contact with a confirmed case PCR testing should be administered – and, therefore, how long they should be excluded from production.

The vaccination status and any COVID-19-related vulnerabilities of other team members as well as the overall risk profile of the production must be taken into consideration as part of that risk assessment. Producers should note which vaccines are currently accepted for exemption from self-isolation, and the impact on production this may have in the case of crew, cast and contributors travelling to the UK from overseas should be considered.

**Irrespective of the COVID-19 variant encountered, and government advice followed, producers should not assume that fully vaccinated individuals will automatically be able to resume close contact production.**

It may be useful to refer to or to include NHS Guidance for someone with symptoms of coronavirus as of 15DEC21 (please check for updates):

<https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works#how-the-nhs-test-and-trace-service-works>

**For the avoidance of doubt, add the following UK Government definition of close contact as of 14DEC21 (please check for updates):**

*A close contact is a person who has been close to someone who has tested positive for COVID-19. You can be a contact anytime from 2 days before the person who tested positive developed their symptoms, and up to 10 days after. This is when the virus can be passed to others. A risk assessment may be undertaken to determine this, but a contact can be:*

- *anyone who lives in the same household as another person who has COVID-19 symptoms or 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:*
  - *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*
  - *been within 2 metres of someone for more than 15 minutes (either as a one-off contact, or added up together over one day)*

*A person may also be a close contact if they have travelled in the same vehicle or plane as a person who has tested positive for COVID-19. [NB: See note re shared transportation and travel protocols, below.]*

See also [guidance for non-household contacts](#).

*An interaction through a Perspex (or equivalent) screen with someone who has tested positive for COVID-19 is not usually considered to be a contact, as long as there has been no other contact such as those in the list above. [NB: Perspex screens in private hire vehicles may not be a sufficient mitigation to prevent the necessity to self-isolate in the event that the driver or passenger(s) subsequently test positive for COVID-19.]*

*The wearing of personal protective equipment (PPE) will not be considered as a mitigation when assessing whether a recent contact is likely to have transmitted the virus. Only full medical-grade PPE worn in health and care settings will be considered.*

### **If any of your workers test positive**

*Employers should call the Self-Isolation Service Hub on 020 3743 6715 as soon as they are made aware that any of their workers have tested positive.*

*Employers will need to provide the 8-digit NHS Test and Trace Account ID (sometimes referred to as a CTAS number) of the person who tested positive, alongside the names of co-workers identified as close contacts. This will ensure that all workplace contacts are registered with NHS Test and Trace and can receive the necessary public health advice, including the support available to help people to self-isolate.*

*In the event of an outbreak in the workplace, employers should contact their local health protection team.*

<https://www.gov.uk/guidance/nhs-test-and-trace-workplace-guidance> [Last updated 15DEC21]

NB: Channel 4 is to be notified prior to producers contacting their local health protection team.

**Re Hair and Makeup Artists (HMUA):** common mitigations of mask, visor, apron and gloves notwithstanding this is still considered close contact. Although the risk of onward transmission may be low in this scenario, either party may still have to self-isolate for up to 10 days (depending upon their vaccination status and scenario-specific risk assessment) if the other subsequently tests positive, **which may be a production risk, particularly if filming will last for more than one day.**

**It may therefore be advisable to PCR test HMUA prior to filming to help control this risk to production.**

**Re Shared Transportation:** [the UK government definition of close contact](#) states that someone may be a close contact if they have:

- *travelled in the same vehicle or plane as a person who has tested positive for COVID-19*

Therefore, the common mitigations of mask/social distance/ventilation/hand hygiene and duration of travel notwithstanding, this will almost certainly be considered close contact (even in larger vehicles). Although the risk of onward transmission may be low in this scenario,

everyone sharing transport may still have to self-isolate for up to 10 days (depending upon their vaccination status and scenario-specific risk assessment) if anyone on board subsequently tests positive, **which may be a production risk, particularly if filming will last for more than one day.**

**It is not the case that Channel 4 prohibits the use of shared transportation, but producers should consider the risks to production it may generate. It may therefore be advisable to PCR test travel cohorts prior to travel to help control risk to production.**

## 19. FILMING OVERSEAS

Productions filmed abroad by UK personnel usually adhere to either local COVID guidelines or UK guidelines – whichever are most risk averse. Please could add in the locally-specific definition of close contact for all countries/regions, and bullet point what the local regulatory requirements are for anyone who has been within that definition of close contact with a suspected or confirmed case, including variations and specifications for fully vaccinated individuals. Channel 4 needs to be able to see that the crew are acting in accordance with local requirements and therefore, importantly, what the implications for production continuity are. We also need to know what the local regulatory requirements are for anyone displaying symptoms of coronavirus, and what the locally-recognised symptoms are in each country/region to be visited.

Production personnel should confirm that they understand and agree to any necessary quarantine requirements on return to the UK, which may affect their subsequent ability to work and may restrict their movements. Producers should consider the budgetary and logistical impact of any necessary quarantine requirements.

## 20. "HISTORIC" POSITIVES

You will need to consider carefully how the impact that positive results generated by non-infectious material remaining from historic infections are mitigated. Historic positives can pose an existential threat to CCC productions.

Individuals who develop COVID-19 or test positive may end their period of social isolation in line with current government guidance, provided they have not had a high temperature for 48 hours (without any medication being taken to lower the temperature) and are feeling well. Symptoms of persistent coughing and loss of taste / smell can persist for some weeks after recovery. They may then (re-)enter a CCC, provided they are well, and neither a (re-)entry test nor ongoing testing is recommended for 90 days from the time they developed symptoms or tested positive. This is because testing cannot differentiate between residual viral RNA (which can linger for many weeks) and active infection. Epidemiological evidence shows that re-infection within 90 days is extremely rare.

## 21. LATERAL FLOW TESTS

Channel 4 does not ordinarily expect to see lateral flow tests incorporated into COVID-19 production protocols, **except where their use is advised by government guidance following close contact with a confirmed positive case.**

LFTs remain significantly less accurate than PCR tests. They may generate false positives (which have caused production interruption and which is a production risk) and false negatives (which may give a false and potentially dangerous sense of reassurance).

In the event that a member of the team will not participate without LFTs, if they are a non-negotiable requirement of a third party integral to production, or if their use is a regulatory requirement, then it must be underlined to production team members that a “negative” result should effectively be disregarded, all personnel should be assumed potentially to be infected, and all core mitigations must remain strictly adhered to.

**LFTs must not be used to enable close contact working.**

Currently, LFT positives in England must be interrogated with a PCR test within **48 hours**, during which time the results should be considered accurate and appropriate mitigations followed. This should be reflected in your protocols. Please consider the implications of a positive LFT result on production continuity.

## **2: COVID-19 GENERAL CHECKLIST**

Producers should also address the following non-exhaustive issues:

- When compiling the production pre-filming **health declaration**, consider including, where practical, details of all crew and key contributors’ previous whereabouts for the preceding 10 days, including details of any known possible exposure to COVID-19; whether any team member is in quarantine after returning from overseas; is awaiting the result of a COVID-19 test; the ages of all crew and key contributors; details of crew dependents and family members in the same household with special vulnerability to COVID-19; and in the case of anyone who will be PCR tested for COVID-19 in the course of the production as part of an asymptomatic screening programme: details of any confirmed COVID-19 diagnosis 90 days prior to planned testing by production
- Subject to government advice, it may be necessary to identify the current COVID-19 situation in specific areas where filming is due to take place, and/or in areas that will be travelled through to reach your intended location - which may in turn have their own local COVID-19 testing or regulatory requirements (for example, areas in which Variants of Concern have been identified)
- **Be aware that the nations and regions of the UK have different COVID-19 requirements which may be more stringent than in England.**
- Please ensure you have made provision for the Application of non-COVID-19 H&S requirements/risk assessments (including the administration of first aid)
- Please confirm with your Production Finance Manager any relevant insurance provision (including the DCMS, Marsh-administered Production Restart Scheme (PRS). **Producers should take care that their PCR testing regimes comply with the requirements of the PRS**

### **ADDITIONAL CONSIDERATIONS RE PCR TESTING AND CLOSE CONTACT COHORTS (CCCs):**

(See also Section 1, above, and the separately-issued Section 7, Annex A of *TV Production Guidance: Managing the risk of Coronavirus (COVID-19) in production making* (Version 7 – 08 September 2021) - *Alternative Options to Allow for Close Contact in TV Production, The Close Contact Cohorts Protocol.*)

**COVID-19-tested Close Contact Cohorts are not necessary for all productions. They are usually established when two or more crew, cast or contributors who are not part of the same household need, for essential editorial, safety or logistical reasons, to commingle freely and have close contact with each other and who cannot therefore maintain social distance.**

**Within CCCs, the core mitigations or social-distancing, hand hygiene, mask-wearing and ventilation must be maintained whenever it is possible to do so.**

**CCC Members must also maintain social distance from people who are not in the CCC. For this reason, producers must consider carefully whether establishing a CCC is practicable in scenarios where CCC members are likely to come into contact with members of the general public.**

**Will crew/cast/contributors be tested for COVID-19? Will a CCC or Bubble be established?**

- If so, what testing regime and schedule will be carried out? How long before production or travel begins will testing begin? Will the crew remain in strict self-isolation or adhere to a period of limited contact (PoLC) or “soft-isolation” during the testing period? What behavioural regime will be expected of tested team members (for example limiting social contacts) during the pre-filming isolation/PoLC and during filming? Please detail these expectations in your protocols
- Where will pre-filming or pre-travel isolation happen? If the intention is for people to self-isolate at home has an investigation been carried out to make sure meaningful isolation can occur? Has consideration been given to relocating individuals who cannot properly isolate at home into more suitable accommodation?
- Who will carry out the tests? If PCR tests are used, will the testing provider be able to provide the Ct values of positive PCR test results?
- How will testing form part of your filming protocols? How will test results be recorded? Will there be ongoing testing for COVID-19? If so of what frequency? Will any team members in the CCC need to interact with a CCC on a different production (for example actors employed on multiple projects)? Have the COVID-19 mitigations of the associated production been assessed? Are your COVID-19 mitigations contingent on third party planning and risk assessments?
- Any crew, cast or contributors who return tests reported as “positive” should be isolated immediately as per NHS guidelines

**Will you be filming in a COVID ‘bubble’?**

- If so, what measures will be taken to prepare the closed set (construction, adaptation of existing structures and spaces, ventilation, deep cleaning, etc)?
- To what extent will the closed set be truly closed? Will crew, cast or contributors need to leave the set – for editorial or logistical reasons?
- What measures will be taken to retain the integrity of the closed set in addition to the creation of a COVID-19-tested Close Contact Cohort or Bubble (see above) (PPE, disinfection of deliveries, etc)?
- Will special measures for crew, cast and contributor accommodation be required (see also “Accommodation” below)?

Who from outside might breach the closed set and for what purpose (medical, show runner, deliveries, technical staff/riggers, drivers/boat operators, etc)? What are your Suspected Infected Person Protocols (SIPP – see above)? Will there be the capacity to quarantine a (suspected) infection

within the closed set? Will the closed set be indoors, outdoors, or a mixture (see “filming inside” and “filming outside”, below)?

- Will there be internal health checks within the closed set?
- Will there be an editorial imperative for all team members to commingle and not socially distance from each other, or will some people be able to maintain social distance?
- Will you be using a smaller, separated, team “cohorts” or “fixed teams” to help mitigate the risks posed by any incidence of COVID-19 on set? If so, how will their integrity be maintained? Will screens and covered walkways be used? Will one-way systems be employed? Who may enter what part of the closed set and for what reason? Will there be a medic on location?
- How many non-filming days arising from COVID-19-related pauses could the production absorb prior to losing content? Are there any inflexible aspects to the schedule (for example a fixed end date on location hire) that could result in a COVID-19 event generating a disproportionate or defining impact on production continuity?

## **TRAVEL AND ARRIVAL**

In all scenarios, please consider **how** the crew and contributors will travel to the planned location:

Will your means of transport be shared with other people? Will you be establishing transportation cohorts? If so, see above re close contact and shared transportation.

- Will you use private transport, public transport, use a taxi, hire a car or coach or go on foot, or by bicycle, etc? Following the advice of your health and safety advisors, the use of public transport should likely be eliminated wherever possible unless not to use it would generate increased COVID-19 or other health and safety risks (for example, for long distance journeys)
- Will you need to disinfect your travel space (for example train table; car door handles, steering wheel, gear shift, key fob, and other controls) before or after travel?
- Has additional time been factored into the filming day to account for logistical issues generated by COVID-19-? Will call times on location or on set be staggered to assist social distancing?

## **LOCATION**

In all scenarios, please consider the place(s) **where** you will be filming and **how** you will be filming.

- What is the smallest possible crew size required to film safely and effectively?
- In line with standard industry practice, we suggest that a dedicated and appropriately trained COVID Supervisor or Monitor be present on the production - responsible for ensuring COVID protocols are implemented and adhered to. Subject to the requirements of production, this role may be fulfilled by someone who also has another role on the production
- Will a full daily log of who attends location each day to be kept by the COVID-19 Supervisor/Monitor so that tracing of cast/crew/contributors can be undertaken in the event that anyone tests positive for COVID-19? For how long will these records be kept in accordance with data protection obligations?

### **Will you be filming outside?**

- If so, will you be in the public domain and potentially seen by the public/passers-by? How will you maintain appropriate social distancing from the general public?

- What are the dimensions of the spaces that you will be using? How many square metres have been allocated to each individual (taking into account obstacles)? Could your presence attract an unwanted/hostile reaction from the public?
- Does your filming conform to the best practice recommended by the UK Government and NHS to the general public? If required, what sanitary, toilet and restroom facilities and measures will be in place?

### **Will you be filming inside?**

- If so, what are the dimensions of the spaces that you will be using? How many people are likely to be present? How many square metres have been allocated to each individual (taking into account obstacles such as furniture, equipment, etc)? What distance will the crew be able to maintain from the public and contributors; what distance will contributors and the public be able to maintain from each other? Will one-way systems be employed? What disinfection protocols will be adhered to before entering the space, once inside and when leaving? Will any special alterations need to be made to the space? Will it be pre-rigged? If so, what COVID-19 protocols will apply to rigging and derigging? What sanitary, toilet and restroom facilities and measures will be in place? Will you be using a "cohort" or "fixed teams" system to help mitigate the risks posed by any incidence of COVID-19 on set?

### **Will you be filming in a medical facility?**

- What advice has the facility offered to you? How will you disinfect yourselves, your clothes (if necessary) and your equipment before entering and on leaving? Will you need to take spare clothing to change into when you leave? Will the clothing you take need to be sealed and then washed? Is the clothing you will be wearing easy to disinfect?
- How will you manage anti-infection protocols once inside the facility, and when moving between different parts of the facility?
- How will your filming protocols work alongside those of the facility you will be filming in? Will the authorities who manage the facility you will be filming in require sight/agreement of your protocols? Will you be filming in Green and/or Red Zones? Will you be in the proximity of Aerosol Generating Procedures (AGPs) or other higher risk procedures?

### **PPE**

- Will PPE be required (as opposed to simple face coverings)? (If "yes" please provide full details.) Will all crew members have received training on how to fit, use and remove PPE?

### **EQUIPMENT**

#### **Please consider the equipment you will be using.**

- How will you record audio? How will you disinfect audio equipment (including microphone covers) before and after filming? What distance will you need to be from the people you intend to film and will you have the appropriate equipment to do this? How will you disinfect media/memory cards and what protocols will you put in place to ensure that shared equipment (for example smartphones, media cards, laptops and hard drives) do not risk spreading the virus? Will you require other, specialist equipment – such as hidden cameras, or large studio items?

## **3: FOOD, ACCOMMODATION AND THE LOCAL COMMUNITY**

Please ensure your health and safety advisors have signed off all third-party providers and suppliers (for example catering, accommodation, studio, car hire, etc).

- What measures are in place to provide the crew, cast and contributors with daily subsistence?
- What anti-COVID-19 infection measures will be taken by the crew when sourcing subsistence?
- Where will the crew, cast and contributors be staying?
- What anti-COVID-19 infection measures will be taken at the accommodation by the crew and by the people/authorities managing the accommodation?
- What impact on the local community might the crew's arrival/presence have? What measures will be taken to mitigate this impact? Could filming generate a hostile reaction from the local community? What measures could be put in place to communicate effectively with the local community?

## **4: WORKING WITH DISABLED PEOPLE**

It is likely that you will be working with people who are disabled, whether their impairments, conditions, injuries or illnesses are immediately apparent or not. However, this is not a basis for excluding them from filming, either behind or in front of camera. As at any time, it is important to create an inclusive and safe culture in which people feel comfortable, where appropriate, to disclose this information to you in order that you can ensure their welfare and provide any necessary reasonable adjustments. Do not make assumptions about disabled people but instead have an open dialogue with them and ask them what they need to do their job or be involved in filming safely and effectively, and always take their lead.

Please ask all cast, contributors and crew if they require alternative, accessible formats of your communications including your COVID-19-safe protocols and ensure you have the capacity to communicate them in multiple accessible formats, should that be required – whether that be Easy Read text, British Sign Language, audio, large print or others.

You can find out more about accessible communications formats at [gov.uk](https://www.gov.uk)

## **5: PSYCHOLOGICAL SECURITY**

Unless explicit consent is given otherwise, personal mental health information disclosed to producers should only be done confidentially with the consent of the individual and kept securely.

Please give sufficient consideration to the potential psychological effect that filming COVID-19-related material may have on production teams, contributors, and their families. Please consider the potential psychological impact of contracting COVID-19, or of mandatory self-isolation.

- Do any team members have pre-existing mental health issues that may require treatment/management on location?
- Could any of the planned filming opportunities or scenarios generate a risk of psychological trauma to the crew, cast or contributors?

## **6: PRIVACY**

**You should be mindful of your obligations to keep information safe and secure and to handle it in accordance with your legal obligations including those concerning data protection.**

For our part if you provide information to us Channel 4 is committed to keeping your information safe and secure and handling it in accordance with our legal obligations. Our Data Protection Officer (DPO) is responsible for making sure that Channel 4 treats your data correctly and can be contacted at [dataprotection@channel4.co.uk](mailto:dataprotection@channel4.co.uk).

Channel 4 must make sure that it has a legal basis to process personal data and to say what this is.

Channel 4 collects personal data, including special categories of personal data such as health data, in order to ensure the health and safety of the people involved in making the programmes that it broadcasts and to ensure we fulfil our duty of care obligations as set out in the Ofcom Broadcasting Code.

In order to do so Channel 4 may need to share information you provide to us with:

- Third parties, for example a risk assessment/hostile filming consultant
- Insurers
- A national embassy, government agency, law firm and/or a third-party specialist security company or medical professionals

When Channel 4 shares this information with third parties, it will do so securely. If Channel 4 has to send this outside of the EU, it will do so in compliance with the General Data Protection Regulation 2018 ('GDPR').

## APPENDIX I: AUDIENCE GUIDELINES

**The following are for consideration only. They are not official guidelines and should not be interpreted as such. They are not exhaustive. Producers must follow national, regional and local government regulations and guidelines and submit their own plans and protocols specific to their filming project for review and discussion.**

In the case of productions where a production team needs to move around the audience, the safest way to proceed is likely to maintain 2m social distancing for everyone in that production. The best way to reduce potential impacts to production may, currently, be to continue to have socially distanced audiences.

However, now the legal restrictions on social distancing have been removed and events can take place with crowds or full capacity venues, where a production requires a non-socially distanced audience, then the following controls are to be applied **as a suggested minimum and subject to site- and activity-specific risk assessment**:

Where possible, producers should ensure that premises meet the requirements of the guidance from the Chartered Institution of Building Services Engineers (CIBSE).

### Certification

Where practicable, as a condition of entry to a venue Channel 4 expects all guests in England (over the age of 18) to provide a negative COVID-19 LFT result (taken a maximum of 24 hours prior to attending the event) from a UK Government-approved test provider (either via a home kit or via a test centre), with certification shown via email or text.

Where this is not practicable, or management of the event is outside of the producer's control, as a condition of entry to a venue, all guests (age 18 and over) may need to provide **either one** of the following certification:

1. A negative COVID-19 LFT result (taken in the 48 hours prior to attending the event) from a UK Government-approved test provider (either via a home kit or via a test centre), with certification shown via email or text; **OR**
2. Are vaccinated with 2 doses of an approved vaccine (or one of the single-dose Janssen vaccine) which guests shall be required to show evidence of via: (a) the NHS App England or (b) via the approved certification routes for Ticket Holders from Scotland, Wales and Northern Ireland; **OR**
3. Are exempt from vaccination and testing on the basis of a medical exemption or clinical trial participation

LFTs should be taken as late as possible before attending the event, ideally within 12 hours. This will strengthen the protection testing provides.

Attendees under the age of 18 should be asked for verbal confirmation (by them or by a parent or guardian on their behalf) that they have not received a positive test for COVID-19 in the last 10 days and are not displaying symptoms of COVID-19. Failure to comply will result in the relevant guest being denied entry.

In addition, some venues and events in England are now legally-obliged to carry out COVID-19 status checks, with entry governed by the NHS COVID-19 Pass.

## Other Measures

- **Masks or Face Coverings** (as appropriate) - are required by law for audience members over the age of 11 in England. However, where an audience maintains 2m social distancing, face coverings are not required.
- **Sufficient Ventilation** - 10 litres of fresh air per second per person is the CIBSE benchmark for suitable ventilation. If this can be achieved, in conjunction with the health certification options (above), then maintaining social distance is not necessary.

If 10 l/s/person can't be achieved with maximum capacity, then consideration should be given to decreasing numbers to a point where it can. Ensure ventilation systems are set to using a fresh air supply and not recirculating indoor air. In areas where there is a reliance on a mixture of mechanical and natural ventilation, or natural ventilation alone, a CO<sub>2</sub> monitor can help to assess whether a space is poorly ventilated. [CIBSE guidance](#) recommends a maximum CO<sub>2</sub> concentration of 800 – 1000 ppm (10 l/s/person) for many activities. Where the CO<sub>2</sub> concentration is above 1000 ppm additional mechanical ventilation / increased natural air flow should be considered (or numbers reduced). Multi-occupant spaces that are used regularly and are poorly ventilated (below 5 l/s/person or above 1500 ppm CO<sub>2</sub> for prolonged periods) should not be used.

In spaces with low occupancy or where enhanced aerosol generation is likely (such as through aerobic exercise, singing or loud speech) ventilation should be sufficient to maintain CO<sub>2</sub> concentrations below 800ppm (typically 10-15 l/s/person). It may be wise to consider additional mitigations, such as reduced exposure (occupancy) times, the use of face coverings, restricting the size of groups and reducing the duration of activities.

There may be occasions where a production is being conducted in venues outside of your control and tight timeline schedules may not always allow an inspection of the ventilation system to be performed. In this scenario the default position should be to keep numbers low and/or to maintaining 2m social distancing where appropriate. As this is the primary control, none of the health certifications (above) are needed, though face coverings are encouraged and may be required.

**Contributing Audience** - For an audience which will be contributing to the production, i.e. Where the audience are acting as 'contributors', our expectation is that they should abide by the same protocols as crew, cast and other contributors.

**Children** - For an audience consisting of children further considerations may be required as part of the risk assessment process, including impact on behaviour due to maturity and methodology for screening and checking COVID status. Consideration should also be given to the fact that children will not generally be vaccinated against COVID-19 and therefore may be more likely to spread the virus. In scenarios where children (under 18) are attending an event producers or event managers may decide to accept confirmation from their accompanying teacher to confirm the health of the whole class confirming that there have been no positive lateral flow tests in previous 10 days. Groups of children should remain in bubbles.

**Production Personnel** – Production personnel who may come in close contact with members of the audience (e.g. audience services) should not mix with the wider production team. Further control measure for production personnel who mix with the audience should be put in place if social distancing is not being observed as a primary control (e.g. keeping time in close contact to a minimum, use screens/barriers to separate people, reduce number of people workers have contact with e.g. fixed teams). Recommendations for production personnel on productions in addition to ensuring adequate ventilation, enhanced cleaning etc:

- Social distancing
- Face coverings
- Compulsory PCR (or equivalent) testing for CCC membership
- Self-declarations of health
- Individual risk assessments for those people at higher risk
- Temperature testing

## **APPENDIX II: CHECKING AND RECORDING COVID-19 STATUS**

Your reason for checking or recording people's COVID status must be clear, necessary and transparent. If you cannot specify a use for this information and are recording it on a 'just in case' basis, or if you can achieve your goal without collecting this data, you are unlikely to be able to justify collecting it.

If you want to check the COVID status of crew, cast or contributors, you must be clear about what you are trying to achieve and how asking people for their COVID status helps to achieve it.

You should be clear how long you are storing the information for (do not hold data for longer than is necessary) and people should be advised that if their COVID status is likely to have a negative consequence for someone then you should be able to justify why.

You should not routinely disclose a person's vaccine status unless you have a legitimate and necessary reason to do so.

**DOCUMENT ENDS**