Guidance for Safe Working in Post-Production and VFX during the COVID-19 Pandemic

Version 1.5  24th July 2020

Produced in consultation with:
1. Introduction and context

1.1. Post-production and VFX companies in the UK are open for business. In fact, they never closed because of the COVID-19 pandemic.

1.2. A full range of services are available, albeit with some necessary changes to ensure the safety of both workers and clients. Customers can be reassured that they can access the great creativity, and reliability that the UK’s post-production and VFX companies are renowned for.

1.3. In their response to the pandemic, the post-production & VFX companies have demonstrated their ability to adapt to circumstances whilst continuing to deliver great service. Many of adjustments are hoped to be temporary, but we may find that some of the changes are an improvement and become permanent. This is not without precedent. When the Japanese tsunami disabled much of the world’s videotape manufacturing plants, this accelerated the move to fully digital working by probably two years. The adage that “Necessity is the mother of invention”, rings true and there is nobody better placed to deliver innovation than the UK’s post-production and VFX companies.

1.4. Post-production and VFX are highly competitive sectors and commercial pressures are high. Companies compete on quality, creativity, innovation, reliability and of course value for money. But they must never compete on their acquiescence to compromise the health and safety of their staff or clients. The aim of this Guidance is to define industry accepted best practice, to reduce confusion and give consistency across the sector, thereby reducing the pressure on employers to accept external demands for modes of working which could be considered unsafe for workers or visitors.

1.5. On March 23rd, the government introduced a lockdown to prevent the spread of coronavirus which included the mandatory closure of businesses in the hospitality, leisure, and retail sectors. Post-production and VFX businesses were not required to close during the lockdown, allowing them to continue to operate using a combination of working from home via remotely connected equipment or social distancing/hygiene measures for the few operations that need to be performed on-premises. Subsequently, the government produced new guidance for businesses to get more people back to work by making workplaces “COVID-19 secure”.

1.6. Guidance for physical production has been developed by a group led by the British Film Commission (BFC) to get filming restarted safely as COVID-19 has brought it to a virtual stop. Other guidance also been published by the UK broadcasters and by the Advertising Producers Association (APA). Post-production and VFX are already capable of working so the aim of this Guidance is different to the other documents. It documents best working practices already in use and aims to provide a framework for

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1 The Health Protection (Coronavirus, Restrictions) (England) Regulations 2020  


3 BFC guidance for filming  

4 UK TV Broadcast Production guidance  
http://www.pact.co.uk/uploads/assets/uploaded/bafea386-4e38-4bfe-b77a98e804384e9b.pdf?userDownload=true

5 APA Covod-19 protocol  
https://www.dropbox.com/sh/fg6javcgz6hpox/AABUJcYka_r7NBlmdneF5MgUa?dl=0
Companies as they transition back to on-premises working with client attendance, as and when conditions allow.

1.7. The Guidance will evolve as government guidance and regulation changes. It may need to be strengthened or relaxed from time to time as required to react to circumstances. It will only remain in force for as short a time as it is needed and will be withdrawn once government guidelines are lifted.

1.8. Safe working conditions can be achieved for creative workers, support workers, manager, supervisors, and clients by working from home and by severely limiting the number of workers and visitors at the Company’s premises. However, the risk of transmission can be substantially reduced if COVID-19 secure guidelines are closely followed. From August 1st 2020, the government advice to work from home as a first choice has been amended and employers are given more discretion about who should return to the workplace, in consultation with their employees and ensuring appropriate mitigations and safeguards are in place.

1.9. Clients must be aware that there are viable alternatives to visiting the premises in almost all conceivable circumstances, by using remote viewing and conferencing technology.

1.10. References in this Guidance to “Visitors” and the protocols for receiving them onto the premises are therefore for those exceptional circumstances or are in preparation for the point when clients will be allowed to attend sessions as a matter of course. That point is approaching and is being reviewed in consultation with stakeholders. Once the consultation is complete, this Guidance will be updated but until then client attendance is currently discouraged if there is a viable alternative.
2. Definitions

- “Company” or “Companies” refer to a post-production or VFX company
- “Worker” means an employee or contractor working for a post-production or VFX company
- “Visitor” means anyone entering a post-production or VFX company who is not contracted by the company. This includes clients, suppliers, contractors, volunteers, and people on work experience.

3. Ownership, endorsement, and scope of this Guidance

3.1. This Guidance (the “Guidance”) for safe working during the COVID-19 pandemic in post-production and VFX has been prepared by and will be administered by the UK Screen Alliance, the UK trade association for post-production, visual effects, animation, studio and location service providers. (ukscreenalliance.co.uk)

3.2. This Guidance has been produced in consultation with industry stakeholders including BFC, BFI, BECTU, Pact and DCMS and has been endorsed by the British Film Commission Recovery Group and the British Film Institute Screen Sector Task Force. UK Screen Alliance will continue to consult with stakeholders on future changes to this Guidance.

3.3. Post-production and VFX companies are encouraged to develop their own local plan based on this Guidance, which considers the layout of their premises, the structure of their teams, operational requirements, available technology, and other local variables.

3.4. These materials are for general information purposes only, are not intended to constitute legal or other professional advice and should not be relied on or treated as a substitute for specific advice relevant to particular circumstances. Neither the UK Screen Alliance nor the contributors to these materials accept any responsibility or liability for any harm, damage or loss which may arise from reliance on these materials. You should contact a suitably qualified legal/professional advisor on any specific problem or matter.

3.5. This Guidance does not replace the government guidance and companies are advised to familiarise themselves with the available government guidance and keep abreast of any developments on a regular basis. https://www.gov.uk/guidance/working-safely-during-coronavirus-COVID-19

6 List of responding organisations to the consultation and companies adopting this guidance can be seen here: https://www.ukscreenalliance.co.uk/campaigns/guidance-for-safe-working-in-post-production-and-vfx-during-the-covid-19-pandemic/
4. **Revisions of this Guidance and version control**

4.1. The Guidance will be in operation until such time as all COVID-19 restrictions by government are lifted. The Guidance will be reviewed regularly to see if it needs to be strengthened, relaxed, simplified or explained in greater detail. The Guidance will be quickly updated following any changes to government recommendations or restrictions.²

4.2. The version of the Guidance to be used is that which is current at the time of the performance of a service and not the version which was current at the time of booking that service. Companies should consider making that distinction clear to customers when accepting bookings.


4.4. Other leading industry sites are encouraged to link to this master copy to avoid having multiple and potentially conflicting versions. Stakeholders are encouraged to sign up to an email group hosted by UK Screen Alliance which will be used to inform stakeholders of changes to the Guidance. https://www.ukscreenalliance.co.uk/contact/

5. **Devolved nations and local restrictions**

5.1. This Guidance aims to be relevant to all Post-Production and VFX companies in the UK, However, the governments of the four nations of the UK have diverged in their COVID-19 recommendations and restrictions and on the timing of any changes. Additionally, there is now the real possibility of local lockdown restrictions (e.g. citywide as in Leicester or for specific districts or workplaces). Companies must ensure that they comply with the regulations and guidance in force at that time and for the local area in which they are operating.

5.2. Website links in this Guidance apart from those below are relevant to England only. The following websites should be consulted for local advice relevant to the devolved nations

- Wales - https://gov.wales/coronavirus

² The UK government is committed to review the coronavirus lockdown restrictions every 3 weeks at least
6. Risk assessment, management, and compliance

6.1. COVID-19 is a public health emergency. Everyone needs to assess and manage the risks of COVID-19, and in particular businesses should consider the risks to their workers and visitors. As an employer, you also have a legal responsibility to protect workers and others from risk to their health and safety. This means you need to think about the risks they face and do everything reasonably practicable to minimise them, recognising you cannot completely eliminate the risk of COVID-19.

6.2. You must make sure that the risk assessment for your business addresses the risks of COVID-19, using this guidance to inform your decisions and control measures. A risk assessment is not about creating huge amounts of paperwork, but rather about identifying sensible measures to control the risks in your workplace. If you have fewer than five workers, you do not have to write anything down as part of your risk assessment. Your risk assessment will help you decide whether you have done everything you need to. There are interactive tools available to support you from the Health and Safety Executive (HSE) at [https://www.hse.gov.uk/risk/assessment.htm](https://www.hse.gov.uk/risk/assessment.htm)

6.3. Employers have a duty to consult their people on health and safety. You can do this by listening and talking to them about the work and how you will manage risks from COVID-19. The people who do the work are often the best people to understand the risks in the workplace and will have a view on how to work safely. Involving them in making decisions shows that you take their health and safety seriously. You must consult with the health and safety representative selected by a recognised trade union or, if there is not one, a representative chosen by workers. As an employer, you cannot decide who the representative will be.

6.4. At its most effective, full involvement of your workers creates a culture where relationships between employers and workers are based on collaboration, trust and joint problem solving. As is normal practice, workers should be involved in assessing workplace risks and the development and review of workplace health and safety policies in partnership with the employer.

6.5. Employers and workers should always come together to resolve issues. If concerns still cannot be resolved, see below for further steps you can take.

6.6. Enforcement

6.6.1. Where the enforcing authority, such as the HSE or your local authority, identifies employers who are not taking action to comply with the relevant public health legislation and guidance to control public health risks, they are empowered to take a range of actions to improve control of workplace risks. For example, this would cover employers not taking appropriate action to ensure social distancing, where possible.

6.6.2. Failure to complete a risk assessment which takes account of COVID-19 or completing a risk assessment but failing to put in place sufficient measures to manage the risk of COVID-19, could constitute a breach of health and safety law. The actions the enforcing authority can take include the provision of specific
advice to employers to support them to achieve the required standard, through to issuing enforcement notices to help secure improvements. Serious breaches and failure to comply with enforcement notices can constitute a criminal offence, with serious fines and even imprisonment for up to two years. There is also a wider system of enforcement, which includes specific obligations and conditions for licensed premises.

6.6.3. Employers are expected to respond to any advice or notices issued by enforcing authorities rapidly and are required to do so within any timescales imposed by the enforcing authorities. The vast majority of employers are responsible and will join with the UK’s fight against COVID-19 by working with the Government and their sector bodies to protect their workers and the public. However, inspectors are carrying out compliance checks nationwide to ensure that employers are taking the necessary steps.

6.7. How to raise a concern:

- Contact your employee representative
- Contact your trade union if you have one
- Use the HSE form available at https://www.hse.gov.uk/contact/concerns.htm
- Contact HSE by phone on 0300 003 1647

6.8. Managing risk

6.8.1. Employers have a duty to reduce workplace risk to the lowest reasonably practicable level by taking preventative measures. Employers must work with any other employers or contractors sharing the workplace so that everybody’s health and safety is protected. In the context of COVID-19 this means protecting the health and safety of your workers and visitors by working through these steps in order:

- Ensuring both workers and visitors who feel unwell stay at home and do not attend the premises.
- In every workplace, increasing the frequency of handwashing and surface cleaning.
- Businesses and workplaces should make every reasonable effort to ensure their employees can work safely. From 1 August 2020, this may be working from home, or within the workplace if COVID-19 secure guidelines are followed closely. When in the workplace, everyone should make every reasonable effort to comply with the social distancing guidelines set out by the government (2m, or 1m with risk mitigation where 2m is not viable).
- Where it is not possible to comply with the social distancing guidelines, workplaces should consider whether an activity can be redesigned to maintain a 2m distance.
- Where the social distancing guidelines cannot be followed in full, in relation to a particular activity, businesses should consider whether that activity needs to continue for the business to operate, and if so, take all the mitigating actions
possible to reduce the risk of transmission between their staff. You should consider and set out the mitigations you will introduce in your risk assessment.

Further mitigating actions include:

- Further increasing the frequency of hand washing and surface cleaning.
- Keeping the activity time involved as short as possible.
- Using screens or barriers to separate people from each other.
- Using back-to-back or side-to-side working (rather than face-to-face) whenever possible.
- Reducing the number of people each person has contact with by using ‘fixed teams or partnering’ (so each person works with only a few others).
- You should ensure that steps are taken to avoid people needing to unduly raise their voices to each other. This includes, but is not limited to, refraining from playing music or broadcasts that may encourage shouting, including if played at a volume that makes normal conversation difficult. This is because of the potential for increased risk of transmission, particularly from aerosol transmission. The Government intends to develop further guidance, based on scientific evidence, to enable these activities as soon as possible.

- You must ensure that volunteers or people on work-experience are afforded the same level of protection to their health and safety as others

6.8.2. If people must work face-to-face for a sustained period with more than a small group of fixed partners, then you will need to assess whether the activity can safely go ahead. No one is obliged to work in an unsafe work environment.

6.8.3. In your assessment you should have regard to whether the people doing the work are especially vulnerable to COVID-19.

6.8.4. If you have not already done so, you should carry out an assessment of the risks posed by COVID-19 in your workplace as soon as possible. If you are currently operating, you are likely to have gone through a lot of this thinking already, but it is recommended that you use this document to identify any further improvements you should make.

6.8.5. Adopting new ways of working to help reduce the risk of COVID-19 transmission is essential, however you should maintain due consideration of the environmental impact wherever possible.

6.8.6. Companies should conduct regular reviews of their risk assessment (at least weekly or after a change of government regulations or guidance) to ensure:

- that protocols are being adhered to
- that protocols align with the latest guidelines and regulations from government, local authorities, regulators, and the current version of this Guidance

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8 Government, local authority and regulatory body guidelines and regulations must always take precedence over this Guidance if there is any conflict or doubt
• whether the measures in place are enough or require alternative or additional solutions

6.8.7. Companies should implement and communicate a “non-compliance” process should workers fail to adhere to the protocols defined in the risk assessment. Companies may decide to incorporate this process into their disciplinary procedures.

6.8.8. Employers should share the results of their risk assessment with their workforce. If possible, they should consider publishing the results on their website (and the government would expect all employers with over 50 workers to do so). The government expects all businesses to demonstrate to their workers and visitors that they have properly assessed their risk and taken appropriate measures to mitigate this.

6.8.9. Employers should display signage in a prominent place in their premises and on their website that they have conducted a COVID-19 risk assessment. The government has provided template signage⁹.

![Staying COVID-19 Secure in 2020](https://assets.publishing.service.gov.uk/media/5ef2895ee90e075c5582f4d1/staying-covid-19-secure-accessible.pdf)

**Download Covid-19 risk assessment signage**

6.8.10. Companies should provide written or spoken communication of the latest guidelines to both workers and visitors inside and outside the premises. Companies should display posters or information setting out how visitors should behave at your premises to keep everyone safe.

⁹ Download Covid-19 risk assessment signage [https://assets.publishing.service.gov.uk/media/5ef2895ee90e075c5582f4d1/staying-covid-19-secure-accessible.pdf](https://assets.publishing.service.gov.uk/media/5ef2895ee90e075c5582f4d1/staying-covid-19-secure-accessible.pdf)
6.9. **Training**

6.9.1. The Company’s risk assessment should be included in the on-boarding process for new starters.

6.9.2. All workers should be given mandatory training of the protocols that must be followed and any subsequent changes to those protocols. Workers should confirm receipt of the risk assessment and any delivery of mandatory training must be documented. Provide a central accessible repository for COVID-19 protocols (e.g. on the Company’s intranet.)

6.9.3. Companies should upgrade the training of their designated first-aiders, so they are fully informed of COVID-19 risks and any mitigating procedures.\(^{10}\)

6.9.4. Companies should ensure workers understanding of the Company’s COVID-19 protocols is regularly reinforced and any changes notified by reminder emails, texts, or WhatsApp messages and by signage in the building.

6.10. **Symptom Response Plan**

6.10.1. The risk assessment should include a clear Symptom Response Plan that is ready to implement should someone exhibit symptoms of COVID-19 or be at work when they should be self-isolating.

6.10.2. The main symptoms\(^ {11}\) of coronavirus are:

- **high temperature** – this means you feel hot to touch on your chest or back (you do not need to measure your temperature)
- **new, continuous cough** – this means coughing a lot for more than an hour, or 3 or more coughing episodes in 24 hours (if you usually have a cough, it may be worse than usual)
- **loss or change to your sense of smell or taste** – this means you have noticed you cannot smell or taste anything, or things smell or taste different to normal
- Most people with coronavirus have at least one of these symptoms.

6.10.3. As part of the risk assessment plan, Companies should have a designated isolation room where anybody displaying symptoms of COVID-19 (or is suspected to have had close contact with someone who may be infectious) should be requested to remain during the short period while transport is arranged to send the person home. The isolation room must be deep cleaned immediately after use using appropriate PPE, along with any other areas in the workplace that had been visited by the person showing symptoms.

6.10.4. The suspected case should be sent home as soon as possible by private transport with appropriate protections for the driver. The suspected case should seek advice from the NHS 111 service and must self-isolate at home for at least 7 days.

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\(^{11}\) NHS website – Check if you have coronavirus symptoms [https://www.nhs.uk/conditions/coronavirus-covid-19/check-if-you-have-coronavirus-symptoms/](https://www.nhs.uk/conditions/coronavirus-covid-19/check-if-you-have-coronavirus-symptoms/)
Companies should strongly recommend that the suspected case orders a COVID-19 test from the NHS Test and Trace system\textsuperscript{12} \url{https://www.nhs.uk/ask-for-a-coronavirus-test} or calls 119. Any test should be done within 5 days of first showing symptoms. If the test result is negative, the suspected case no longer needs to self-isolate and may return to work.

6.10.5. Companies may consider arranging private testing for any worker if they or members of their household show symptoms, to avoid unnecessary self-quarantine and delays in diagnosis.

6.10.6. The Company should instigate contact tracing to identify and inform any workers or visitors who had been in contact with the suspected case within the last 2 days. Before contact from the NHS Test andTrace service, the co-workers and other close contacts of the suspected case do not officially have to self-isolate yet. However, Companies may decide to send co-workers home immediately as a precaution, where they should follow the government guidance on self-isolation for contacts of people with possible or confirmed Covid-19\textsuperscript{13}. They may return to the premises, if the original suspected case returns a negative test result for COVID-19. Companies should cooperate with the NHS Test and Trace service wherever possible in identifying potential contacts.

6.10.7. The suspected case should keep the Company updated on their prognosis as requested by the Company. The worker should inform the Company of the result of any subsequent COVID-19 test.

6.10.8. Companies should ensure that they are familiar with the recent changes to the legislation\textsuperscript{14} relating to statutory sick pay (SSP) and how these apply to individuals who are isolating.

6.10.9. If an employee contracted coronavirus at the workplace employers must report this to the Health and Safety Executive, as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).

6.10.10. If there is more than one case of COVID-19 associated with a workplace, employers should contact their local health protection team\textsuperscript{15} to report the suspected outbreak. The heath protection team will:

- undertake a risk assessment
- provide public health advice
- where necessary, establish a multi-agency incident management team to manage the outbreak

\textsuperscript{12} The service is called NHS Test and Trace in England, 'Test and Protect' in Scotland, or 'Test, trace, protect' in Wales.


\textsuperscript{14} Gov.uk page about Statutory Sick Pay (SSP) \url{https://www.gov.uk/statutory-sick-pay}

\textsuperscript{15} Find your local health protection team
6.11. **Data protection**

6.11.1. Companies need to identify what additional personal data will be collected with respect to addressing COVID-19, most likely this will be collecting information from workers and visitors and temperature testing\(^{16}\).  

6.11.2. Companies will need to identify suitable lawful bases for collecting this personal data. Consent will likely not be the applicable lawful basis and legitimate interests should be relied upon as well as necessary to comply with employment obligation with respect to personal data relating to health.  

6.11.3. Companies will need to conduct a risk assessment for collection and processing of such personal data and should seek legal advice. This risk assessment should not be published.  

6.11.4. Companies will need to update worker and visitor privacy notices and should including signage at the entrance to premises to notify people of additional processing of personal data for COVID-19 related purposes.  

6.11.5. Companies will need to ensure that additional personal data collected is kept suitably secure and with restricted access.  

6.11.6. Companies will need to ensure that such personal data is not retained for any longer than is necessary.

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\(^{17}\) Refer to the section in this Guidance about Contact Tracing and the recommendations for interacting with NHS Test & Trace
7. Who should go to work?

In order to keep the virus under control, it is important that people work safely. Working from home remains one way to do this. However, the risk of transmission can be substantially reduced if COVID-19 secure guidelines are followed closely.

Employers should consult with their employees to determine who, **from the 1 August 2020**, can come into the workplace safely taking account of a person’s use of public transport, childcare responsibilities, protected characteristics, and other individual circumstances. Extra consideration should be given to those people at higher risk.

When it is decided that workers should come into their place of work then this will need to be reflected in the COVID-19 risk assessment and actions taken to manage the risks of transmission in line with this guidance. It is vital employers engage with workers to ensure they feel safe returning to work, and they should avoid forcing anyone into an unsafe workplace.

- Consider the maximum number of people who can be safely accommodated on site.
- Plan for a phased return to work for people safely and effectively.
- Monitor the wellbeing of people who are working from home and helping them stay connected to the rest of the workforce, especially if most of their colleagues are on-site.
- Keep in touch with off-site workers on their working arrangements including their welfare, mental and physical health, and personal security.
- Provide equipment for people to work from home safely and effectively, for example, remote access to work systems.

7.1. Protecting people who are at higher risk

7.1.1. Clinically extremely vulnerable individuals**18** have been strongly advised not to work outside the home during the pandemic peak and only return to work when community infection rates are low. After August 1**19**, 2020, it is expected but not yet confirmed that they will no longer required to be shielding and then they may attend the workplace if it is COVID-19 secure and if they maintain strict 2m social distancing.

7.1.2. Clinically vulnerable individuals**19**, who are at higher risk of severe illness (for example, people with some pre-existing conditions), have been asked to take extra

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**18** Clinically extremely vulnerable people will have received a letter telling them they are in this group, or they will have been told by their GP. Guidance on who is in this group can be found here: 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

**19** Clinically vulnerable people include those aged 70 or over and those with some underlying health conditions, all members of this group are listed in the ‘clinically vulnerable’ section here: https://www.gov.uk/government/publications/full-guidance-on-staying-at-home-and-away-from-others/full-guidance-on-staying-at-home-and-away-from-others
care in observing social distancing and should be helped to work from home, either in their current role or in an alternative role.

7.1.3. If clinically vulnerable (but not extremely clinically vulnerable) individuals cannot work from home, they should be offered the option of the safest available on-site roles, enabling them to maintain social distancing guidelines (2m, or 1m with risk mitigation where 2m is not viable, is acceptable). If they cannot maintain social distancing you should carefully assess whether this involves an acceptable level of risk. As for any workplace risk you must consider those with protected characteristics, including, for example, expectant mothers who are, as always, entitled to suspension on full pay if suitable roles cannot be found. Particular attention should also be paid to people who live with clinically extremely vulnerable individuals.

7.2. **People who need to self-isolate**

7.2.1. Companies must make sure individuals who are advised to stay at home under existing government guidance do not physically come to work. This includes individuals who have symptoms of COVID-19 as well as those who live in a household or support bubble\(^{20}\) with someone who has symptoms.

7.2.2. Companies should support workers who need to self-isolate and must not ask them to attend the workplace. If the worker remains well and it is practicable to do so, Companies may find alternative work that can be completed at home during the period of self-isolation.

7.2.3. If workers cannot work at home, they may be entitled to Statutory Sick Pay (SSP) while they are in self-isolation if they meet the eligibility conditions.\(^{21}\) The NHS Test and Trace service will provide a notification that can be used as evidence that someone has been told to self-isolate. A worker may also take their paid holiday entitling them to full pay rather than SSP if they choose.

7.2.4. Workers should be aware of government guidance for living in households where someone has symptoms of COVID-19.\(^{22}\)

7.2.5. On 1\(^{st}\) August, the shielding programme is expected to be paused, then it will no longer be possible to claim SSP for people who were shielding.

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\(^{20}\) [https://www.gov.uk/guidance/meeting-people-from-outside-your-household](https://www.gov.uk/guidance/meeting-people-from-outside-your-household)


7.3. **Equality in the workplace**

7.3.1. Employers have an obligation to treat everyone in the workplace equally.

7.3.2. In applying this Guidance, employers should be mindful of the needs of different groups of workers or individuals.

7.3.3. It is breaking the law to discriminate, directly or indirectly, against anyone because of a protected characteristic such as age, sex, or disability.

7.3.4. Employers also have responsibilities towards disabled workers and those who are new or expectant mothers.

7.3.5. Understand and consider the circumstances of those with different protected characteristics, such as those who are hearing or visually impaired. (e.g. Please be mindful that the wearing of a face covering may inhibit communication with people who rely on lip reading, facial expressions, and clear sound.)

7.3.6. Involve and communicate appropriately with workers whose protected characteristics might either expose them to a different degree of risk or might make any steps you are thinking about inappropriate or challenging for them. (e.g. ensure any changes to entries, exits and queue management take into account reasonable adjustments for those who need them, including disabled workers and visitors)

7.3.7. Consider whether you need to put in place any measures or adjustments to take account of your duties under the Equalities legislation.

7.3.8. Make reasonable adjustments to avoid disabled workers being put at a disadvantage and assessing the health and safety risks for new or expectant mothers.

7.3.9. Make sure that the steps you take do not have an unjustifiable negative impact on some groups compared to others, for example those with caring responsibilities or those with religious commitments.

7.3.10. Employers are advised to explore any concerns raised by workers about attending the workplace even in cases where protected characteristics do not appear to be relevant. Appropriate legal advice should be taken in this area.
8. **Personal hygiene, and well-being**

8.1. Wash your hands frequently using soap and water for 20 seconds, and especially after blowing your nose, sneezing, coughing, on arrival at work, before and after eating, after handling shared objects like money or keys, after touching shared surfaces like lift buttons or keypads, after using public transport, and when you arrive home.

8.2. Avoid touching your face, especially your eyes, nose, and mouth as much as possible.

8.3. Cough/sneeze into a tissue and immediately dispose of the tissue, then wash your hands or use hand sanitiser. Cough/sneeze into the crook of your elbow if you have not got a tissue.

8.4. The new social etiquette for greeting people is to avoid handshaking, fist or elbow bumps, hugs, or kisses. Verbal greetings are enough.

8.5. Personal property should not be shared. This includes items such as pens, phones, chargers, and iPads. Personal items should be regularly wiped with suitable anti-viral wipes. This includes spectacles and spectacle cases. Avoid sharing newspapers and magazines.

8.6. Workers and visitors should be encouraged to bring only essential personal items into the workplace to minimise the contamination risk.

8.7. Workers should not be allowed to have personal online shopping purchases delivered to the workplace to minimise the contamination risk.

8.8. Workers may be experiencing additional COVID-19 related anxiety and stress at this unusual time, whether they are returning to the workplace, commuting, or working from home. Companies are encouraged to explore and be sensitive to these anxieties and workers should discuss them with their managers. In addition, the Film and TV Charity operate a 24-hour support line in the UK - 0800 054 0000

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23 How to wash your hands [https://www.nhs.uk/live-well/healthy-body/best-way-to-wash-your-hands/](https://www.nhs.uk/live-well/healthy-body/best-way-to-wash-your-hands/)
9. **Contact tracing**

9.1.1. The NHS Test and Trace service has been introduced in England with similar services in Scotland, Wales, and Northern Ireland\(^2\). The NHS is also developing a smartphone app to trace contacts with possible COVID-19 exposure. The deployment date of the app is uncertain at present.

9.1.2. If and when the NHS introduces a smart phone tracking application, Companies should strongly recommend that their workers install the NHS app and have it activated both inside and outside of work.

9.1.3. Companies should cooperate with the NHS Test and Trace service in identifying potential contacts.

9.1.4. Companies should ensure that they have up to date contact details for their employees and contractors. Companies should keep logs of the composition of worker’s cohorts, teams or shifts and any variation from the normal pattern, to aid contact tracing.

9.1.5. Companies should request visitors to provide contact details for the purpose of contact tracing. This may be in conjunction with the Company’s normal practice of collecting visitor data for business and security purposes. Contact data collected should include name, contact phone number, who they are visiting, and dates and times of arrival and departure from the premises. No additional data should be collected for the purpose of contact tracing. Should Companies collect additional data from visitors for other purposes, it should be made clear to visitors which data is not required for contact tracing purposes.

9.1.6. Visitors should be able to choose to opt-out of sharing their details with the NHS Test & Trace service. Companies should not share their data with NHS Test and Trace if they choose to opt-out.

9.1.7. The accuracy of the information provided will be the responsibility of the individual who provides it. Companies do not have to verify an individual’s identity for NHS Test and Trace purposes.

9.1.8. To support NHS Test and Trace, you should hold records for 21 days. This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing. After 21 days, this information should be securely disposed of or deleted. When deleting or disposing of data, you must do so in a way that does not risk unintended access (e.g. shredding paper documents and ensuring permanent deletion of electronic files).

9.1.9. Records which are made and kept for other business purposes do not need to be disposed of after 21 days. The requirement to dispose of the data relates to a record that is created solely for the purpose of NHS Test and Trace. All collected

\(^2\) The service is called NHS Test and Trace in England, 'Test and Protect' in Scotland, or 'Test, trace, protect' in Wales. [https://www.gov.uk/guidance/nhs-test-and-trace-workplace-guidance](https://www.gov.uk/guidance/nhs-test-and-trace-workplace-guidance)
data, however, must comply with the General Data Protection Regulation and should not be kept for longer than is necessary.

9.1.10. NHS Test and Trace will ask for these records only where it is necessary, either because someone who has tested positive for COVID-19 has listed your premises as a place they visited recently, or because your premises have been identified as the location of a potential local outbreak of COVID-19.

9.1.11. NHS Test and Trace will work with you, if contacted, to ensure that information is shared in a safe and secure way. You should share the requested information as soon as possible to help us identify people who may have been in contact with the virus and help minimise the onward spread of COVID-19.

9.1.12. If a Company receives a request for information from NHS Test and Trace this does not mean that they must close their establishment. NHS Test and Trace will, if necessary, undertake an assessment and work with the Company to understand what actions need to be taken. Depending on the circumstances and the length of time that has elapsed, this could include arranging for people to be tested, asking them to take extra care with social distancing and/or – in some circumstances – asking them to self-isolate. NHS Test and Trace will give the Company the necessary public health support and guidance. The Company’s workers will be included in any risk assessment and NHS Test and Trace will advise them what they should do.

9.1.13. If any worker or visitor receives a notification from the NHS test and trace service (or via the NHS smart phone app) that they may have been exposed to COVID-19, they must follow the instructions given by the Test and Trace service. They must not attend the workplace, nor should they complete their current working day or shift if they are already at work. They must return home immediately and stay there, where they must self-isolate.

9.1.14. Employees should instruct their employers to let them know immediately if they have been contacted by the service, show symptoms of COVID-19, are awaiting a test result or have tested positive. Failure to tell the employer could be judged as misconduct and included as a disciplinary offence as it puts others at risk. Any workers who try to attend the workplace in contravention of a Test and Trace notice could be disciplined for misconduct.

9.1.15. Self-isolating employees should work from home, if they can, and be paid as usual. If the employee cannot work from home and have been told by Test and Trace system to self-isolate, they are entitled to SSP for the 14-day isolation period regardless of symptoms. Employers with fewer than 250 employees on 28 February 2020 can use the formal Test and Trace notification supplied to them by the employee to claim the employers’ SSP coronavirus rebate. Employers could offer paid holiday if the employee prefers.

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25 Refer to the section in this Guidance about Data Protection

26 Refer to Gov.uk webpage for advice on verifying the authenticity of any contact tracer [https://www.gov.uk/guidance/maintaining-records-of-staff-customers-and-visitors-to-support-nhs-test-and-trace](https://www.gov.uk/guidance/maintaining-records-of-staff-customers-and-visitors-to-support-nhs-test-and-trace)
10. Working from home

10.1. Post-production and VFX work can continue by using remote/distributed workflows. This enables many creative artists\(^{27}\), technical support and production/admin/management workers to work from home. This should be the first-choice option rather than working at the Company’s premises.

10.2. Visitors must not attend temporary edit suites installed in workers’ private houses. Instead video conferencing services should be used for interaction between creative teams, managers, and clients. For viewing the output of the suite or workstation, a secure remote viewing capability should be used, or upload review and approval files to a secure site, according to the agreed security protocols.

10.3. Refer to the section of this Guidance on Equipment Hire and Remote Kit Installation for information on delivery, set-up, and collection of equipment in workers’ houses.

10.4. Any installation of remote workstations in clients’ or workers’ houses must be compliant with any electronic and physical content security agreement (e.g. TPN) between the Company and the client, as appropriate for the genre of production.

- Ensure that workstation screens are positioned so as not to be visible to unauthorised persons, whether from inside or outside of the property
- Ensure that at no point will the screens be shared with anyone else
- Ensure that at no point will the work be discussed with, viewed by, or otherwise accessed by any household member outside of the security agreement.
- If necessary, extend any NDA coverage to other household members.
- Ensure that no screenshots are taken, whether on the workstation or by mobile device
- Ensure compliance with any provisions of the security agreement prohibiting copying or downloading of content and uploading content to unauthorised locations.

10.5. Companies should keep in regular touch with off-site workers on their working arrangements including their welfare, mental and physical health, and personal security. They may be experiencing additional COVID-19 related anxiety and stress at this unusual time.

The Film and TV Charity operate a 24-hour support line in the UK - 0800 054 0000

10.6. Companies should consider updating their home working policies during this time and keep these under review and in line with the government guidance.

\(^{27}\) This document uses the term Creative Artists to cover jobs such as offline editor, online editor, colourist, audio editor, dubbing mixer and VFX artists.
11. **Working on the premises**

11.1. The preferred operations to be carried out on-premises are ones that cannot be performed successfully at home by using remote/distributed technology, and only the number of people that can be safely accommodated given social distancing practices should be working on the premises. Visitors should be strongly discouraged.

11.2. **Who should not be admitted to the premises?**

11.2.1. The following groups of people must not attend post-production or VFX companies either as workers or visitors:

- People displaying symptoms of COVID-19
- People who should be self-isolating as they suspect they may have been exposed to or have been suffering from COVID-19 or have been asked to self-isolate by the NHS Test and Trace service (or the NHS app when available).
- People who live in the same household or are in a “support bubble” with someone who is self-isolating
- People who should be self-isolating after visiting certain countries within the last 14 days which are excluded from the government’s safe travel corridor list. The exemption for Film & High-End TV cast & crew only applies to filming locations and not to post-production or VFX companies.
- People who are clinically extremely vulnerable and should be “shielding”. They should not attend the workplace and should work from home instead. [Shielding requirements are expected to be paused on August 1st]

11.2.2. Companies should display signage at their entrances to their premises which is visible externally, detailing the groups of people who should not enter.

11.2.3. Workers should complete a daily health declaration on entering (preferably prior to arriving) the premises as part of the reception sign-in process, asking if they fall

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28 NHS – Check if you have coronavirus symptoms [https://www.nhs.uk/conditions/coronavirus-covid-19/check-if-you-have-coronavirus-symptoms/](https://www.nhs.uk/conditions/coronavirus-covid-19/check-if-you-have-coronavirus-symptoms/)


30 Definition of ‘Support Bubble’: ‘The term ‘support bubble’ refers to single adult households, where adults live alone or with dependent children only, expanding their support network so that it includes one other household of any size. Further guidance on this can be found here: [https://www.gov.uk/guidance/meeting-people-from-outside-your-household](https://www.gov.uk/guidance/meeting-people-from-outside-your-household)


32 [List of countries for which you do not have to self-isolate on your return to the UK](https://www.gov.uk/government/publications/covid-19-self-isolation-exemptions-guidance-v-1-0-06-07-20)


into any of the groups who are not permitted entry to the premises. This is to comply with the Company’s obligations under RIDDOR.36

11.2.4. Whilst not currently required by government recommendations, Companies may also consider conducting a temperature check of a worker at any time whilst on the Company’s premises. This should be done with a non-contact infrared thermometer or thermal imager by an operator wearing appropriate PPE to compensate for compromised social distancing. You should treat a temperature above 37.8°C as a possible COVID-19 symptom and invoke the Symptom Response Plan.

11.2.5. Companies should review and update their data protection policy to ensure that they meet their obligations with respect to recording and storing personal data relating to health (see the Data Protection section of this Guidance for details).

11.3. **Hygiene, handwashing, sanitation facilities and toilets**

11.3.1. Companies should deploy signage and posters to build awareness of good handwashing technique, the need to increase handwashing frequency, avoid touching your face and to cough or sneeze into a tissue which is binned safely, or into your arm if a tissue is not available.

11.3.2. Provide regular reminders and signage to maintain hygiene standards.

11.3.3. In addition to the hand sanitising facilities available in washrooms, Companies should provide hand sanitiser at key locations such kitchen tea points and reception areas.

11.3.4. Provide hand drying facilities, either paper towels or electrical dryers.

11.3.5. Enhance cleaning for busy areas.

11.3.6. Provide more waste facilities and more frequent rubbish collection.

11.3.7. Companies should set out a clear waste management process, considering safe handling and disposal or recycling where applicable, of:

- Used PPE
- Catering waste
- ‘Regular’ waste

When disposing of face coverings and PPE, you should do so in a “black-bag” waste bin or litter bin. Face coverings or PPE should not be put in a recycling bin or dropped as litter. Businesses should provide extra bins for workers and visitors to dispose of single-use face coverings and PPE and should ensure that workers and visitors do not use a recycling bin. Full details on how to dispose of your personal or business waste during the coronavirus pandemic can be found on GOV.UK.37

11.3.8. Set clear use and cleaning guidance for toilets, with increased frequency of cleaning in line with usage. Use normal cleaning products, paying attention to frequently hand touched surfaces, and consider use of disposable cloths or paper roll to clean all hard surfaces. Put up a visible cleaning schedule can keep it up to date and visible.

11.3.9. Companies should assess the size of their washrooms/WCs regarding social distancing. If there is adequate space close off alternate cubicles, urinals, or washbasins to achieve the required separation. If the minimum required separation cannot be achieved, make washrooms single person use only with appropriate external indication if washroom is occupied or vacant.

11.3.10. Consider the use of social distancing marking in areas where queues normally form, and the adoption of a limited entry approach, with one in, one out (whilst avoiding the creation of additional bottlenecks).

11.3.11. To enable good hand hygiene, consider making hand sanitiser available on entry to toilets where safe and practical, and ensure suitable handwashing facilities including running water and liquid soap and suitable options for drying (either paper towels or hand driers) are available.

11.3.12. Where possible touchless dispensers should be provided for hand sanitiser, soap, paper towels and warm water. Where this is not possible ensure that dispensers and taps are sanitised regularly. Also regularly sanitise air hand dryers that are manually started by button and if possible, advise by signage, the use of elbows rather than hands to activate.

11.3.13. Keep the facilities well ventilated, for example by fixing doors open where appropriate.

11.4. Cleaning of contact areas and hard surfaces

11.4.1. Coronavirus on surfaces can easily be cleaned with common household disinfectants which will kill the virus. The government has given guidance on cleaning in non-healthcare settings. Studies have shown that the COVID-19 virus can survive for up to 72 hours on plastic and stainless steel, less than 4 hours on copper and less than 24 hours on cardboard. There have been no specific studies into how long the COVID-19 lasts on fabrics but reports suggest that some virus experts think it may last 24 hours.

11.4.2. Professionally clean all working, waiting and other communal areas at least daily, preferably using a specialist contractor.

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39 [https://www.who.int/news-room/q-a-detail/q-a-coronaviruses](https://www.who.int/news-room/q-a-detail/q-a-coronaviruses)
11.4.3. Disinfect frequent touch areas at least every 2 hours. For example, door handles, door push plates, door release buttons, access control keypads and turnstiles, light switches, cupboard handles, air conditioning controls, banisters, handrails, lift buttons, washroom & WC fittings, soap dispensers, air dryers, counter, table and seating areas in receptions, despatch and catering areas. Do not forget to disinfect exterior door handles, door intercoms and bell pushes.

11.4.4. Telephone handsets for clients in suites should preferably be removed. Visitors should use their own personal mobile phones. Telephone handsets for workers’ use must be disinfected at least twice daily and should not be shared.

11.4.5. Individual technical equipment such as keyboards, mice, graphics tablets & styli, should be disinfected at least twice daily by the user.

11.4.6. Networked equipment like printers and scanners should be disinfected at least twice daily and wiped after use if they are shared with other users.

11.5. **Ventilation**

11.5.1. The risk of COVID-19 is less outdoors or in well ventilated areas.

11.5.2. Ventilation into the building should be optimised to ensure a fresh air supply is provided to all areas of the facility and increased wherever possible.

11.5.3. Ventilation systems should provide an adequate supply of fresh air.

Many comfort cooling systems installed in edit suites do not bring in fresh air from outside. Comprehensive Guidance on the use of using different type of air conditioning can be found on the CIBSE website.41

11.5.4. Operate the ventilation system when there are people in the building.

11.5.5. Monitor and manage filters in accordance to manufacturer instructions.

11.5.6. Keep doors and windows open if possible.

11.5.7. Use ceiling fans or desk fans to improve air circulation, provided there is good ventilation.

11.5.8. Increase the existing ventilation rate by adjusting the fan speed.

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11.6. Social distancing in the workplace

11.6.1. Workers should be reminded by their employers of the importance of adhering to the UK government’s COVID-19 policies on social distancing and personal hygiene outside of work hours in addition to while working.

11.6.2. You must maintain social distancing in the workplace wherever possible, (2m, or 1m with risk mitigation where 2m is not viable, is acceptable) including while arriving at and departing from work, while in work and when travelling between sites.

11.6.3. Where the social distancing guidelines cannot be followed in full in relation to a particular activity, Companies should consider whether that activity needs to continue for the business to operate, and, if so, take all the mitigating actions possible to reduce the risk of transmission between their workers and visitors.

Mitigating actions include:

- Further increasing the frequency of hand washing and surface cleaning.
- Keeping the activity time involved as short as possible. (No more than 15 minutes)
- Wearing face coverings or appropriate PPE
- Using screens or barriers to separate people from each other.
- Using back-to-back or side-to-side working (rather than face-to-face) whenever possible.
- Reducing the number of people each person has contact with by using ‘fixed teams or partnering’ (so each person works with only a few others).

11.6.4. Social distancing applies to all parts of a business, not just the place where people spend most of their time, but also entrances and exits, communal areas, kitchens, smoking shelters, and similar settings. These are often the most challenging areas to maintain social distancing.

11.6.5. Companies should calculate the maximum safe occupancy levels within each room for social distancing. Consider placing signage inside and outside each room indicating the maximum occupancy allowed.

11.6.6. In open plan offices review the positioning of desks to achieve the required separation for social distancing. Consider using screen or barriers to separate people from each other. Room layouts should not require people to be facing each other. Shoulder to shoulder or back to back is better.

11.6.7. Companies should consider using floor tape markings to create 2m exclusion zones between people in edit suites, grading suites, dubbing theatres, reception, despatch, and general office areas. Companies should consider use of tape markings at 2m lateral intervals across corridor floors to emphasise the need to keep your distance.

11.6.8. Social distancing may be difficult in buildings with narrow corridors, gangways, or staircases, when people need to pass in opposite directions. Consider introducing one-way traffic if your building layout allows or consider providing empty rooms off corridors or stairwells as refuge areas to allow people to pass safely. If you have
two staircases, consider dedicating one for ascending and the other for descending.

11.6.9. Lifts should be assessed for size and the feasibility of social distancing. Their maximum capacity should then be indicated inside and outside the lift. This may mean that lifts can only be used for single occupancy. Use tape on lift floors to indicate individual standing spaces in and advise persons to face the lift walls rather than other occupants. Encourage the use of stairs or assign lifts for ascending only and stairs for descending but also consider the needs of people with disabilities.

11.6.10. Where necessary, companies should restrict access to communal breakout areas and meeting rooms to avoid congregations of people. Ensure that these areas are well ventilated if available for use. Maintain social distancing when using communal breakout areas, meeting rooms and outdoor smoking areas; reinforce this with signage and floor marking tape.

11.6.11. Only participants who are absolutely necessary should physically attend meetings and should maintain social distancing (2m, or 1m with risk mitigation where 2m is not viable, is acceptable). In the context of VFX and post-production meetings would also include viewings and client attendance at any session.

11.6.12. In the event of a fire alarm requiring evacuation of the building, to ensure that everyone can leave as quickly as possible, social distancing measures may temporarily be relaxed, although they should be re-imposed immediately as people gather at the designated muster point.

11.6.13. People involved in the provision of assistance to others in an accident or evacuation scenario should pay attention to sanitation measures immediately afterwards including washing hands.

11.7. Resource allocation & cohorting of workers

11.7.1. Where possible, Companies should allocate suites and equipment so that they are not shared between different workers. Consider implementing a “My Suite” policy where a suite is dedicated permanently to one creative and is not visited by other workers.

11.7.2. Workers should be segregated into teams or cohorts and these cohorts should not mix. Where companies have more than one building, workers should be scheduled to work in only one building. Depending on the scale of operations, companies should also consider cohorting of workers by floor. Where possible use different teams of contract cleaners for different buildings.

11.7.3. Companies should not allow hot-desking or the sharing of workstations on a daily or part-daily basis. If sharing of desk space and workstations is part of a weekly shift pattern, the workspace and equipment must remain unused over the weekend changeover period and be disinfected both before and after use.
11.7.4. Companies should avoid moving equipment between suites. If it must be redeployed it should be sanitised before it is moved.

11.8. Coming to work and leaving work

11.8.1. Working from home should be the first option but travelling to and from work is allowed if you cannot work from home.

11.8.2. The Government currently recommends that you walk or cycle if you can. Where this is not possible, use public transport or drive. It is mandatory to wear face coverings on public transport in England, Scotland and Northern Ireland (and Wales from July 27th). This includes on buses, coaches, trains, trams, Tubes, ferries, and aircraft. The police and Transport for London authorised personnel will be able to issue fixed penalty notices of £100, or £50 if paid in 14 days. Note that Uber has also made it mandatory for drivers and passengers to wear face coverings.

11.8.3. Companies should consider potentially increased commuting times when scheduling workers.

11.8.4. Companies should consider staggering start and end times of shifts to avoid peak commuting periods and to reduce crowding on entrance and exit points of the workplace, taking account of the impact on those with protected characteristics. Companies should consider whether workers’ contracts need amending to address any such changes.

11.8.5. Companies should encourage cycling or walking to work. However, this may not be appropriate for those working after dark. Companies should assess if additional parking or bike storage facilities can be provided.

11.8.6. Workers should not car share on their journey to/from work (or at any time) except with members of their own household or “support bubble”.

11.8.7. Companies may decide to provide cabs to get individual workers to and from work. However, whilst taxis, private hire vehicles or Ubers may provide greater isolation from the public than using rail, tubes, or busses, they cannot be guaranteed to be free from infection risks. Workers should consider using face coverings when using these modes of transport and to wash or sanitise their hands after the journey. Workers should not share cabs.

11.8.8. The government guidance recommends that reception access-control turnstiles should be left open to avoid queuing, but this may conflict with Company protocols on content security. Consider alternative mitigations such as properly managed traffic flow to avoid enforce social distancing on approach to the

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44 Definition of ‘Support Bubble’: ‘The term ‘support bubble’ refers to single adult households, where adults live alone or with dependent children only, expanding their support network so that it includes one other household of any size. Further guidance on this can be found here: https://www.gov.uk/guidance/meeting-people-from-outside-your-household’
turnstiles. Consider also whether the layout and traffic flow through turnstiles allows the required distancing for people passing in opposite directions. Make appropriate mitigations such as closing some gates to increase separation and enforce one-way traffic flow through the remaining gates.

11.8.9. Companies must provide handwashing facilities (or hand sanitiser where not possible) at entry and exit points.

11.8.10. Where possible, provide alternatives to touch-based security devices such as keypads.

11.9. The use of face coverings and PPE in the workplace

11.9.1. The government asks that Companies should not encourage the precautionary use of PPE (Personal Protective Equipment) to protect against COVID-19 outside clinical settings or when responding to a suspected or confirmed case of COVID-19. Unless you are in a situation where the risk of COVID-19 transmission is very high, your risk assessment should reflect the fact that the role of PPE in providing additional protection is extremely limited. However, if your risk assessment shows that PPE is required, then you must provide it free of charge to workers who need it. Any PPE provided must fit properly.

11.9.2. There is growing evidence that wearing a face covering in an enclosed space helps protect individuals and those around them from COVID-19. Face coverings may reduce the likelihood of someone with the infection, particularly if they are asymptomatic, passing it on to others.

11.9.3. A face covering can be very simple\(^{45}\) and may be worn in enclosed spaces where social distancing is not possible. It just needs to cover your mouth and nose. It is not the same as a face mask, such as the surgical masks or respirators used by health and care workers. Similarly, face coverings are not the same as the PPE used to manage risks like dust and spray in an industrial context. Supplies of PPE, including face masks, must continue to be reserved for those who need them to protect against risks in their workplace, such as health and care workers, and those in industrial settings like those exposed to dust hazards.

11.9.4. Face coverings are not a replacement for the other ways of managing risk, including minimising time spent in contact, using fixed teams and partnering for close-up work, and increasing hand and surface washing. These other measures remain the best ways of managing risk in the workplace and government would therefore not expect to see employers relying on face coverings as risk management for the purpose of their health and safety assessments.

11.9.5. Face coverings are mandatory in enclosed public spaces, including shops, supermarkets, shopping centres and transport hubs\(^{46}\). However wearing a face

\(^{45}\) Gov.uk How to make and wear a cloth face covering https://www.gov.uk/government/publications/how-to-wear-and-make-a-cloth-face-covering

covering in an office setting is optional and is not required by law. If you choose to wear one, it is important to use face coverings properly and wash your hands before putting them on and taking them off. You should be prepared to remove your face covering if asked to do so for the purposes of identification (e.g. by police officers etc but also for the purposes of company security).

11.9.6. Companies should support their workers in using face coverings safely if they choose to wear one. This means telling workers:

- wash your hands thoroughly with soap and water for 20 seconds or use hand sanitiser before putting a face covering on, and after removing it
- when wearing a face covering, avoid touching your face or face covering, as you could contaminate them with germs from your hands
- change your face covering if it becomes damp or if you have touched it
- continue to wash your hands regularly
- change and wash your face covering daily
- if the material is washable, wash in line with manufacturer’s instructions. If it is not washable, dispose of it carefully in a “black-bag” waste bin or litter bin. Face coverings or PPE should not be put in a recycling bin or dropped as litter.
- practise social distancing wherever possible

11.9.7. Some people don’t have to wear a face covering including for health, age or equality reasons.

11.9.8. Please be mindful that the wearing of a face covering may inhibit communication with people who rely on lip reading, facial expressions and clear sound.

11.10. Visitor policy – client attendance

11.10.1. Companies should strongly discourage visitors from attending the workplace if there is a viable alternative, which in almost all cases there will be. The expectation should be that client attendance at the premises is very much the exception rather than the norm.

11.10.2. Currently it should not be possible for a client to have permanent or even regular attendance in the suites. In the current government guidance on workplace safety during the pandemic, the nearest references to working in edit suites and dubbing theatres are the sections about how to hold meetings in an office environment. It recommends holding meetings outdoors or in well-ventilated rooms wherever possible. This may not be practical in many edit suites or dubbing theatres which are enclosed boxes often without windows and with climate conditioning which recycles the air. Companies and clients should consider whether it is safe during the pandemic to allow workers and clients to work side by side.

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47 https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres#offices-3-4
side in these rooms, even with adequate social distancing, for many hours each
day and for many days.

11.10.3. Clients choose their craft teams of editors, colourists, and dubbing mixers for their
creative talents. Clients must be prepared to brief their craft teams clearly and
then trust them to get on with the creative process alone, checking in when
necessary remotely.

11.10.4. Face-to-face meetings or briefings should be replaced by phone calls or video
conferencing.

11.10.5. Companies should implement a policy, where visitors are only admitted by prior
appointment, to ensure that there is a valid and necessary reason for the visit in
the absence of any viable alternative method of interaction, to regulate numbers
of visitors to the absolute minimum and to stagger arrival times to avoid
congestion in reception areas.

11.10.6. Visitors should be sent a copy of the Company’s policy on social distancing and
hygiene protocols to be followed when on the Company’s premises. This should be
sent electronically rather than by paper copy. Visitors should be asked to confirm
that they and their colleagues have received, read, and will comply with the
guidance outlined by the Company.

11.10.7. Visitors should complete a daily health declaration on entering, or preferably prior
to arriving at the premises, as part of the reception sign-in process. This should ask
if they fall into any of the groups who are not permitted entry to the premises. This
is to comply with the Company’s obligations under RIDDOR.48

11.10.8. Companies may also ask visitors to consent to a temperature check on arrival or at
any time whilst on the Company’s premises. This should be done with a non-
contact infrared thermometer or thermal imager. You should treat a temperature
above 37.8°C as a possible COVID-19 symptom and invoke the Symptom Response
Plan.

11.10.9. Visitors (Clients and Contractors) should be requested as a condition of entry to
the building, to inform the Company as soon as possible if they display COVID-19
symptoms at any time up to 14 days after visiting the Company’s premises. This
process will be more robust if workers and visitors use the NHS COVID-19 contact
tracking app, when available, and therefore all should be encouraged to download
and use it. Companies may decide to make using the app a condition of entry into
the building once it comes into operation.

11.10.10. Visitors should be requested to consider wearing face coverings while moving
around the building and when occupying the same room as workers.

11.10.11. Visitors should use their own mobile phones while on the premises rather than
fixed telephone handsets in suites, which preferably should have been removed.
Companies should review 4G coverage in their suites and augment any dead spots
with guest Wi-Fi networks to allow Wi-Fi Calling to/from mobile phones.

48 RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013)
11.10.12. Visitors who seriously or persistently fail to comply with social distancing and hygiene measures will be required to leave the premises and may at the Company’s sole discretion be barred either temporarily or permanently.

11.11. **Reception protocol**

11.11.1. Companies should consider providing protective transparent screening to protect receptionists/library & despatch staff from direct contact with other workers, couriers, or visitors. Alternatively mark out an exclusion zone in front of reception desks with floor tape. Companies should provide face coverings if additional protection is needed.

11.11.2. Companies should limit the number of visitors who are held in reception areas and minimise the time for which they are held. Social distancing must be enforced for any waiting visitors. This may involve waiting outside if there is insufficient space inside.

11.11.3. If Company policy requires escorting visitors while in the building, hosts (e.g. runners) should always maintain social distancing from their escorted visitor. This may mean that you cannot use lifts.

11.11.4. Companies should remove items that could be handled by visitors and workers in reception areas, communal areas, and suites. Typically, these may include “coffee table” items such as fruit or sweet bowls, magazines, newspapers, and promotional items. This reduces the risk of cross-infection.

11.11.5. Companies must provide hand sanitiser points for workers and visitors in reception areas.

11.11.6. Reception sign-in procedures should be re-assessed to minimise cross-infection and details should preferably be supplied by visitors in advance. Pens must not be shared. Receptionists should complete visitors book entries rather than requiring visitors to do it. This also includes electronic visitor books using touch screens.

11.11.7. Where documents need to be signed by visitors (e.g. health declarations or NDAs), use electronic solutions rather pen and paper wherever possible. If this requires signing on touch pads, then wipe with sanitising wipes between each use. Ideally send the documents by email to the visitor/worker to complete on their own device and confirm by email reply. If necessary, keep a stock of new pens to be retained by the visitor/worker after signing for personal use only.

11.11.8. Avoid the use of visitors’ name badges in plastic recycled holders and recycled lanyards. Sticky name badges are a possible alternative.

11.11.9. The government does not currently recommend any specific COVID-19 procedures for handling mail deliveries or packages. However please check the section of this Guidance regarding Despatch procedures.

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11.12. **Viewings**

11.12.1. Virtually all post-production and VFX companies can provide remote review and approval facilities, which are the strongly preferred way for production teams to review shots or sequences via the internet. Attending viewings in person on the premises should only be allowed in exceptional circumstances at the sole discretion of the Company.

11.12.2. Clients should be aware that post-production and VFX companies take great care to ensure the calibration of their sound and picture monitoring systems to give consistent and accurate results. Some basic remote viewing systems which are optimised for real-time viewing over the internet or for rapid upload and download of files, may not give a wholly accurate representation of the sound or picture quality of the edited material. This is a necessary compromise for speed and convenience. While these solutions are suitable for editorial collaboration and review, a higher-level remote viewing solution may be deployed to critically assess sound or picture (especially colour) quality remotely. In any case the Company does not have control over the calibration of the customer’s own viewing or listening device or the environment in which they are reviewing. Clients should be mindful of this advice before requesting or insisting on an unnecessary viewing at the Company’s premises.

11.12.3. In a very few exceptional cases, the only viable solution for critical sound and picture viewing will be for the customer to attend the premises (for instance a projected theatrical colour grade or a Dolby Atmos final mix etc.). In these circumstances and at the sole discretion of the Company, only the minimal number of people from the production may attend the session to give sign-off, preferably just 1 person. Consider using two rooms to separate operators and clients and conduct the viewing remotely.

11.13. **Hospitality and runner services**

11.13.1. As Companies have severely limited client attendance to exceptional circumstances only, most have decided to suspend their hospitality runner services altogether for the time being.

11.13.2. Where possible, workers and visitors should be encouraged to bring their own food and drink but avoid using communal fridges.

11.13.3. There must be no communal food serving, e.g. buffets or platters. Consider using single-serving, pre-packaged food/tea/milk/soft drinks/water bottles. No unwrapped food or snacks should be left out.

11.13.4. Kitchen areas should not be accessible to visitors and should be disinfected before and after serving food and at least every two hours in between.

11.13.5. Avoid congregations of workers in catering areas during meal breaks or tea breaks. Companies should close these areas if social distancing is not possible. Eating at the individual’s workspace is preferred.
11.13.6. Take-away food should not be plated-up. It should be delivered to workers and visitors in their suites in its original packaging. Runners should avoid entering suites. Deliveries and wrapped food should be left outside the suites for collection. Workers and visitors in suites should be encouraged to clear their own used catering items and place them outside the suite for collection by the runners.

11.13.7. Runners should not be required to handle cash. Set up suitable charge card or account facilities with suppliers.

11.13.8. Companies should advise runners to wash their hands frequently, as they are the people who move around the premises more frequently than any other worker.
12. **Operational practices**

12.1. **Offline editing**

12.1.1. Client attendance is to be strongly avoided at present. Use a remote review and approval service whenever possible. Interaction between editors and clients should be via phone, email, messaging apps, bespoke review and approval systems or video conferencing.

12.1.2. Productions should be encouraged to go paperless wherever possible to avoid the use of shared production binders or printed transcripts.

12.2. **Colour grading**

12.2.1. Client attendance is to be strongly avoided at present. Instead use a properly colour calibrated remote viewing service whenever possible. Colour accuracy of home or personal devices is not always guaranteed *(Note clause 11.12.2 of this Guidance)*. Interaction between colourists and clients should be via phone, email, messaging apps, bespoke review and approval systems or video conferencing

12.2.2. Only in exceptional circumstances should clients be allowed to view on the premises (e.g. a projected final theatrical grade or HDR/Dolby Vision review). In these circumstances and at the sole discretion of the Company, only the minimal number of people from the production may attend the session to give sign-off, preferably just 1 person. Where practical, consider using two rooms to separate operators and clients and conduct the viewing remotely.

12.3. **Online finishing**

12.3.1. Client attendance is to be strongly avoided at present. Instead use a properly colour calibrated remote viewing service whenever possible. Colour accuracy of home or personal devices is not always guaranteed *(Note clause 11.12.2 of this Guidance)*. Interaction between editors and clients should be via phone, email, messaging apps, bespoke review and approval systems or video conferencing

12.4. **Audio dubbing/re-recording**

12.4.1. Client attendance is to be strongly avoided at present. Use a remote review and approval service whenever possible *(Note clause 11.12.2 of this Guidance)*. Interaction between dubbing mixers or dubbing editors and clients should be via phone, email, messaging apps, bespoke review and approval systems or video conferencing.

12.4.2. Only in exceptional circumstances should clients be allowed to review the mix on the premises (e.g. a final Dolby Atmos, 5.1 surround mix or theatrical mix). In these circumstances and at the sole discretion of the Company, only the minimal number of people from the production may attend the session to give sign-off, preferably
just 1 person. Where practical, consider using two rooms to separate operators and clients and conduct the viewing remotely.

12.4.3. Companies should only allow the minimum number of workers to participate in the mixing process within the dubbing suite. For large theatrical mixes, limit attendance by the dubbing editors to only those necessary for the mix. If they can participate remotely, this is the preferred option.

12.4.4. Everyone must always maintain social distancing.

12.4.5. Workers in a dubbing suite must not share equipment; they must only operate their own workstations and control surfaces. They should also be responsible for the regular sanitising of their own equipment.

12.5. **Audio recording (Voiceover, ADR, and Foley)**

12.5.1. Remote Voice Over (VO), ADR (Dialogue Replacement) or Foley (sound effects) recording sessions with the artist at home are strongly preferred rather than attendance on premises in the studio. This can be achieved with artists who have their own home studio or simple equipment could be shipped to them to be set up under remote instruction. There are many technological solutions available to enable effective remote recording sessions including remote picture cue and remote direction by producers for the voice talent over talkback.

12.5.2. If VO or ADR sessions must take place on the premises, a separate studio and control room set-up is preferred for optimal social distancing.

12.5.3. Should the artist, recording engineer or director need to be in the same room, they must all always maintain social distancing. The room size and layout must be sufficient to facilitate this. Currently this mode of working is not advisable.

12.5.4. If using clip-on personal mics, the voice talent should be instructed to mic themselves up under supervision, maintaining social distancing at all times.

12.5.5. Disinfect microphones, pop-shields, headphones, and lecterns after each session. Keep a log of when it was done. Use metal pop shields which can be more easily disinfected than the fabric gauze type.

12.5.6. Avoid using printing paper scripts, tablets are better. The voice talent should use their own device if possible, but if a studio-owned tablet is used it must be disinfected after each session. Alternatively the voice talent could bring their own printed script which they take after afterwards.

12.5.7. For crowd background recording or “loop-groups” the studio space must be large enough to accommodate the actors each with proper social distancing. This may mean limiting the number of actors and using multi track layering to achieve the effect of a larger crowd. Actors must always observe social distancing between

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each other and between other workers, including on arrival, during the session, recording breaks and leaving the premises.

12.5.8. There is an increased risk of transmission of the virus in aerosol form from live performance. This should also be considered in voice recording, loop-groups, ADR and music recording in studios where raised voices, shouting, singing or playing wind instruments may present additional risks requiring extra mitigations such as increased distancing between each performer and everyone else in the room.

12.6. **Legacy & physical media handing**

12.6.1. Operators should wash or sanitise their hands before and after handling video tapes, film materials, open reel tape machines, film scanners and telecine machines. Operators should dry their hands thoroughly to avoid unnecessary deposits on the surface of the film/tape or film/tape path which may cause the replay to deteriorate. Clean film/tape paths using the normal solvents and routines that have always been used for this purpose.

12.6.2. Where schedules allow isolate any incoming physical media for 72 hours before use as the virus does not survive this long.

12.7. **Despatch and library ops**

12.7.1. Couriers must not be allowed to enter the premises beyond the reception or despatch desk. They must always observe social distancing.

12.7.2. Reception or despatch staff must take care if required to sign for deliveries. Do not handle the courier’s paperwork or use their pen.

12.7.3. Any items delivered to a Company should preferably be sent in disposable outer packaging.

12.7.4. Studies have shown that the COVID-19 virus can survive for up to 72 hours on plastic and less than 24 hours on cardboard. If schedules allow, consider isolating deliveries for an appropriate period to allow any virus on the packaging or contents to die before opening and handling. If this is not possible open the package and safely dispose of the external wrapping. Cleanse the contents where appropriate before allowing them to be delivered within the building. Then wash your hands thoroughly.

12.7.5. Cleansing of technical equipment including hard drives, camera cards, USB sticks, video tapes, data tapes (LTO) should be done by someone with appropriate training.
12.8. Equipment hire and remote kit Installation

12.8.1. Companies must follow the government guidance on “Vehicles - Inbound and outbound goods”\textsuperscript{51}

12.8.2. Companies should ensure that any equipment to be hired out or loaned for remote working is sanitised before dispatch to another company or to a private dwelling.

12.8.3. Where possible provide detailed instructions to allow the recipient to set up the equipment to avoid workers having to visit the premises. Additionally, instructions could be given online.

12.8.4. When workers are required to enter other company’s offices for the delivery, or installation of equipment they must respect the social distancing and hygiene protocols of the visited company if they are stricter than their own company protocols.

12.8.5. When workers are required to enter private dwellings for the delivery, installation or de-rig of equipment, they must comply with the specific government guidance\textsuperscript{52} for people performing services in other people’s homes such as plumbers, meter readers or locksmiths.

12.8.6. There are some circumstances when wearing a face covering may be marginally beneficial as a precautionary measure. The evidence suggests that wearing a face covering does not protect you, but it may protect others if you are infected but have not developed symptoms. This may offer some reassurance to the installation location’s occupants and would also be good customer service.

12.8.7. If the installation requires more than one person, comply with the government guidance for social distancing in vehicles\textsuperscript{53} when travelling to the installation location. Consider using face coverings when travelling or working with a partner in enclosed areas where social distancing cannot be maintained.

12.8.8. Discuss the hygiene measures to be taken with the occupants of the installation location ahead of the visit and ask that they maintain the required social distance from those working. Minimise contact with occupants and avoid surface transmission by minimising touch with surfaces outside the installation area and frequent contact areas like door handles and tabletops.

12.8.9. No work should be carried out in a household which is isolating because one or more family members has symptoms – unless it is to remedy a direct risk to the safety of the household or to public safety.

12.8.10. No work should be carried out in a household where an individual has been advised to shield – unless it is to remedy a direct risk to the safety of the household or to public safety.

\textsuperscript{51} https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/vehicles

\textsuperscript{52} https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/homes

\textsuperscript{53} https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/vehicles#vehicles-3-3
12.8.11. Workers visiting private dwellings or other companies’ premises should take their own food and drink and take breaks outside where possible.

12.8.12. Use sanitiser to wipe down the installation area before commencing the installation. Once the installation is complete and working, wipe the equipment, installation area and any frequent contact areas over once again with sanitiser before handing the equipment over to the client.

12.8.13. Avoid the use of physical delivery paperwork. Do not require the hirer to physically sign for equipment. Use electronic documentation and signing wherever possible.

12.8.14. Where possible provide online or telephone technical assistance to avoid the need to visit the premises for ongoing support issues.

12.8.15. If possible, provide instructions to the hirer for the dismantling of the installation and safe re-packing into flight cases. Use online instruction and supervision if possible.

12.8.16. When it is necessary to revisit the premises or dwelling for de-rig and/or pick-up, if schedules allow, ask the hirer to isolate the equipment for 72 hours prior to pick-up.

12.8.17. Once the equipment is returned to the Company’s hire depot. It should be sanitised before storing for re-use.

12.8.18. Companies are advised to use floor marking tape in warehouses and equipment preparation areas to reinforce the need for social distancing. Workbenches must be arranged to facilitate social distancing.

13. Working on location

13.1. Some VFX workers will be required to work in studios or on-location. However, Companies must ensure that they consider the implications of any protected characteristics and make any appropriate adjustments in accordance with the relevant equalities’ legislation. They should also carefully consider the views of any workers who are concerned or otherwise refuse to attend the studio or location taking appropriate legal advice if necessary.

13.2. Separate guidance\(^5^4\) has been drawn up by the British Film Commission to cover on-set cast and crew including VFX workers.

VFX workers working on the location with a production company will need to consider the health and safety requirements of their employer, the production company operating the location (and any other requirements of the owners of that location) and can refer to the BFC guidance for assistance.

14. Appendix 1 – Health declaration template

This template may be used to gather a daily health declaration from workers and visitors as part of the reception sign-in process. Preferably it should be sent by email or implemented as an online form, rather than as a physical paper form.

**Covid-19 daily health declaration**

**Name:**                       **Contact telephone:**                       **Date:**

Visitors should also complete...

**Company/Production:**                       **Who you are visiting:**

The main symptoms of COVID-19 are:

- **high temperature** – this means you feel hot to touch on your chest or back (you do not need to measure your temperature)
- **new, continuous cough** – this means coughing a lot for more than an hour, or 3 or more coughing episodes in 24 hours (if you usually have a cough, it may be worse than usual)
- **loss or change to your sense of smell or taste** – this means you have noticed you cannot smell or taste anything, or things smell or taste different to normal
- Most people with COVID-19 have at least one of these symptoms

**Please answer the following questions:**

<table>
<thead>
<tr>
<th>Question</th>
<th>YES / NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) I am displaying symptoms of COVID-19 as described above</td>
<td></td>
</tr>
<tr>
<td>b) I should be self-isolating as I suspect I may have been exposed to or have been suffering from COVID-19 in the last 14 days and have not yet received a negative test result.</td>
<td></td>
</tr>
<tr>
<td>c) I have been notified by the NHS Test and Trace service to self-isolate</td>
<td></td>
</tr>
<tr>
<td>d) I am living in the same household or “support bubble” as someone who is self-isolating</td>
<td></td>
</tr>
<tr>
<td>e) I should be self-isolating after visiting a country within the last 14 days which is excluded from the government’s list of safe travel corridors (NB the exemption for film &amp; HETV workers does not apply to post-production)</td>
<td></td>
</tr>
<tr>
<td>f) I am considered “clinically extremely vulnerable” as defined by the government’s COVID-19 guidelines and should be “shielding”. (Shielding restrictions not applicable after August 1st)</td>
<td></td>
</tr>
</tbody>
</table>

**If you have answered YES to any of the above questions, we regret that we cannot admit you to our premises today.**

| g) In the event of a request for contact tracing information You may share my contact details* with NHS Test & Trace | YES / NO |

**Please sign here:**

*We have a legitimate interest in collecting your personal data to protect the health of our employees, contractors, and visitors. This information will be recorded and securely stored in accordance with our data protection and privacy policies [available on request/available online]. This data will be deleted after 21 days.