



Pre-Greenlight: a toolkit for commissioners

Version 1.0

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How to use this guidance

The four tools in this document are to be built into existing processes:

1. [Setting the right tone](#)
2. [Initial labour rights risk assessment of new productions](#)
3. [Questions to ask productions on labour rights risk and planned mitigations](#)
4. [Example contractual terms](#)

1. Setting the right tone

Commissioners should set the right tone from the outset in terms of emphasising labour rights practices and expectations on labour standards from the start of the commissioning process and at subsequent opportunities.

Consistent message

Give a consistent message, ensuring that attention to worker welfare is reflected in:

- Editorial specifications
- Risk management processes
- Contractual terms
- Meetings with production
- Monitoring and reporting

Appropriate budgeting

Ensure that productions are appropriately budgeting for labour risk management and require transparency in terms of reporting on processes, incidents and issues

- Recognise that welfare and human resources support should be factored in as a core cost and do not put pressure on productions to remove this during budget discussions
- Consider providing or requesting that productions provide a contingency fund for self-employed workers in need of emergency support
- Use cost report meetings to increase oversight of labour rights management

Support to productions

Improve support on labour rights risk management to productions, including supplier due diligence, training, tools, signposting and information

- Improve support to productions in identifying known and trusted industry suppliers, through improved pre-approval processes for suppliers that factor in labour risk management
- Consider providing human resources or people management training to production staff and other crew with responsibilities for overseeing the work of subcontractors and industry suppliers
- Use opportunities such as production portals to provide information and signposting
- Consider providing a fund to support self-employed workers in need of emergency support

2. Initial labour rights risk assessment of new productions

To be completed by the broadcaster/commissioner (not the production)

Area	Common risk criteria	Details	Question	Response: Yes/ No / Pending
Geography	Number of locations	The more locations involved in production the higher the number of temporary staff from a range of different labour providers.	Does this production involve the use of multiple locations?	
	Weak rule of law in country locations	Countries where the rule of law is robust and entrenched are more likely to have strong employment laws and therefore could be classified as lower risk. Countries where the rule of law is weak are less likely to have employment protections in place and therefore higher risk.	Is the location for production in any countries where the rule of law is weak?	
Production	Under-priced or low budget productions	Budgets that do not factor in the true cost of making a TV production are likely to put workers at risk by demanding extended hours or using rogue operators that pay ancillary workers low, illegal or no wages	Does the budget appear particularly low or under-priced?	
	Productions with a shortage of skilled and experienced people to fulfil production roles	Less experienced or skilled production staff are more likely to underestimate budgets and time pressures, as well as to overlook potential risks to workers on TV productions.	Is there a shortage of sufficiently skilled or experienced production staff for the roles they are taking on?	
	Productions unable or unwilling to access known and trusted industry suppliers	Productions that use unknown or unchecked suppliers are more at risk of engaging rogue operators. This is more common in areas where trusted suppliers are not available.	Does the production plan to use any unknown/untested suppliers, especially for ancillary work?	
	Level of oversight	The more oversight the broadcaster can exercise, the lower the risk of poor practices.	Is the production at arms' length from the broadcaster with little or no oversight on set?	
Ancillary workers	Labour profile	Workers that are low skilled, low paid or carrying out dirty/dangerous work (such as construction) are more vulnerable to isolation and exploitation. A higher risk production will have a high number of workers with this profile.	Does the production require large numbers of ancillary workers?	
	Reliance on a fixer or other intermediary	Where productions commission suppliers of ancillary workers through a third party, it can be harder to have sufficient oversight of their working conditions.	Will the production rely on a fixer or other intermediary to commission suppliers of ancillary workers?	
Human rights	Known human rights issues	Some productions are high profile or will take place where there are known human rights issues	Are there any known human rights issues related to the production in terms of labour rights, security practices, media freedom or other aspects?	

Risk level	Actions for the broadcaster to take
Low/ Medium Risk 1-2 “Yes”	<ul style="list-style-type: none"> • Document the risk assessment results • Ensure contractual provisions on labour rights standards are in place and understood • Provide advice on implementing requirements and good practice – refer to internal teams for support
High Risk 3-6 “Yes”	<ul style="list-style-type: none"> • Low/Medium Risk activities + • Engage closely to ensure the risks and issues are thoroughly understood and that adequate mitigations are in place • Appoint someone in the team to carry out monitoring checks on set
Very High Risk 7-8 “Yes”	<ul style="list-style-type: none"> • High Risk activities + • Require changes to production plans (e.g. locations, budgets, personnel) • Consider independent review of plans and on-set if significant risks remain

3. Questions to ask productions on labour rights risks and planned mitigations

Questions to be asked pre-greenlight or as part of commissioning specifications

Questions	Strong response	Weak response	Considerations
How have you factored in labour rights and worker wellbeing to the budget presented?	Examples of practical steps taken to protect labour rights and ensure worker wellbeing, including for ancillary workers	No consideration shown for worker wellbeing or clear gaps in relation to ancillary workers	Improvements may require additional budget
Do you anticipate long working hours on this production and, if so, how will you ensure worker wellbeing is not adversely affected?	Clear articulation of plans to address issues related to long working hours	No clear plans or gaps in relation to ancillary workers	Does the production acknowledge and consider how ancillary workers work 'around' the production?
Will the production have any dedicated human resources support?	Examples given of dedicated human rights support	No and no reasonable explanation	Is this something that the broadcaster can help with?
Will the production have any nominated contacts responsible for worker welfare?	Yes and thought shown as to who and why	No or the contacts nominated are inappropriate (e.g. conflicted, too junior etc)	If yes, how will they be prepared for that role (e.g. training, scenario planning)?
Outline the skills and experience of production staff, including in relation to: <ul style="list-style-type: none"> • People management • Subcontractor/supplier management 	Experienced and competent production staff	Lack of experienced and competent production staff	Can the broadcaster provide additional support to the production?
Provide a statement on how you plan to address risks of bullying and harassment on this production	Clear articulation of policies and practices in place	No or limited statement provided	How do plans go beyond a tick-box exercise?
Identify other potential labour rights risks of your production and who may be adversely affected	Clear thought given to ancillary workers and other roles	Nothing identified	Can the broadcaster provide any additional support to the production?
State any further steps you will take to address labour rights risks in production	Examples of additional steps identified	Nothing provided	Does the broadcaster have any resources or insights available?

Weak responses should trigger further due diligence and/or enhanced monitoring of the production

Example contractual terms

It is important to state in the contract how you expect the production company to behave, what actions you expect the production company to take and what rights you will have to monitor those actions.

Contractual terms should include:

- a. An expectation that the production company will provide decent work to all those working on this project (whether directly employed or not) and ensure that everyone receives at least the [London] Living Wage, as defined by the Living Wage Foundation, including those operating as self-employed
- b. An expectation that the production company will identify labour rights risks in their project and ensure minimum welfare standards for all workers
- c. A requirement that the production company will put in place adequate mitigations to address the identified labour rights risks, which should include, but not be limited to, due diligence on their subcontractors and suppliers, together with worker engagement
- d. A requirement for a plan outlining the risks, mitigations and how the effectiveness of the mitigations will be measured to be provided prior or during pre-production
- e. An expectation that the production company will collaborate to review plans, take advice and improve the approach (e.g. through training, knowledge exchange, reviewing any incidents)
- f. A requirement for transparency from the production company in terms of reporting on processes, incidents and issues to broadcasters, as long as that does not put victims at risk or interfere with law enforcement investigations
- g. An expectation that the production company will communicate with the commissioner when the commissioner's actions directly impact on the ability of the production company to implement mitigations or potentially put decent work at risk
- h. A framework for agreeing who bears the costs of changes to projects and for recognising that changes may have impacts on working conditions and practices
- i. An agreement to provide remedy to any workers found to be experiencing exploitative practices