



Protecting the most vulnerable workers

**Information summary for productions on addressing risks of
labour exploitation**

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Introduction

We want you to make the best content that you can and we are proud of how the industry brings teams of people together creatively and technically to achieve this.

We don't want this to be done in a way that puts the most vulnerable workers on a production at risk.

There are a whole range of people needed to make a TV production happen, from the production staff coordinating the whole operation to the skilled work of camera crew, lighting technicians and the art department. There are also a number of ancillary workers needed to keep the crew supplied, fed, transported, secure and properly accommodated. These roles can sometimes be under-appreciated or go unnoticed but that does not make them any less valuable.

Due to their lack of visibility and the fact that their work is often low-paid and physically demanding, these ancillary workers are potentially more vulnerable to exploitation.

This information pack sets out our expectations for TV productions in terms of how they have oversight of and behave towards the most vulnerable workers on set, including those that work in set construction, facilities, cleaning, catering, security and transport. We expect productions to take responsibility for all workers on productions, not only those for whom they have direct legal responsibility.

Why this is important

Exploitative labour practices occur worldwide and could be occurring on our productions.

Labour rights can be violated when workers experience discrimination, no contracts, low/no pay, excessive working hours, forced overtime, insufficient days off, dangerous or unhealthy working conditions and have no means of redress for violations. At the extreme end of labour exploitation is modern slavery and human trafficking. A person may be directly exploited by their employer or they may be legitimately employed but forced to hand their wages over to someone else.

Forced labour tends to occur in roles where work is low paid, dirty, dangerous or physically demanding or where labour is temporary or casual. For example, forced labour has been found globally in hospitality, catering, cleaning, waste management, security and construction. This is why being curious about the people working in such roles and interacting with them so that they are no longer invisible is so important.

Steps we expect our productions to take

1. Getting the culture right
2. Vetting suppliers appropriately
3. Behaving well in supplier relationships
4. Supporting ancillary workers directly
5. Responding to and remedying issues identified

1. Getting the culture right

We expect every production to make it clear from the outset that all those involved in a production, whatever their role and whoever is responsible for their employment, is entitled to respect, dignity and decent working conditions.

We expect productions to establish communications with all workers on set so that they are able to raise concerns and issues over their own or others' working conditions. Such channels can be formal or informal and internal or external. However, we expect that all workers know how to raise concerns, can access mechanisms for doing so and feel comfortable about using the channels provided.

Examples of how to do this include:

- Holding a mandatory meeting at the start of production or project outlining your commitment to the [BFI Principles to tackle and prevent bullying and harassment in the screen industries](#) and to fairness, equality and labour standards and detailing what kind of working environment you want.
- Regularly reminding production staff and crew of the value of ancillary workers and explicitly acknowledging the role they play in sustaining a production.
- Making sure that ancillary workers have a point of contact among production staff to whom they can raise issues or concerns and who makes a point of getting to know ancillary workers.
- Having nominated welfare contacts on set and making sure that all workers know who they are and how to contact them.
- Putting up information on set with details of people or numbers to call should people need help or advice.
- Setting up regular clinics with individuals known to the production but with a sufficient degree of distance who can respond to and address concerns.
- Providing details on how to access external helplines.
- Ensuring that confidential channels are available to workers should they require them.
- Checking that all workers are aware of the avenues open to them to raise concerns and that they would feel comfortable using them.
- Acknowledging ancillary workers who have made particular contributions to the production at the wrap party or at the end of work at a particular location.

Resources

- Checklist for ensuring appropriate grievance channels ([Toolkit: Getting the culture right](#))
- BFI's Guidance on the Prevention of Workplace Bullying and Harassment: <https://www.bfi.org.uk/sites/bfi.org.uk/files/downloads/bfi-bullying-and-harassment-guidance-2018-02-14.pdf>
- Film and TV Charity's 24-hour confidential support line - <https://filmtvcharity.org.uk/we-can-help/support-line/>
- Modern Slavery Helpline - <https://www.modernslaveryhelpline.org/>
- In-house teams of production company or of commissioner

2. Vetting suppliers appropriately

We expect productions to carry out adequate due diligence on suppliers to ensure that they are treating their workers appropriately and respecting their labour rights. Such vetting should be carried out prior to contractual agreement and also reviewed throughout the period that the supplier is working on a production.

We expect all health and safety risk assessments to take into account worker welfare and for the proposed mitigations to be implemented and checked by production staff. This should be an important tool for ensuring that suppliers are taking account of risks to their workers.

Examples of how to do this include:

- Checking that suppliers have the right licences, recruitment practices and employment arrangements in place
- Checking that quotes seem appropriate to cover labour costs
- Questioning any risk assessments supplied that do not include any aspect of worker welfare (e.g. long hours, travel, subsistence) and requiring industry suppliers to resubmit.
- Checking that potential worker welfare issues have been adequately, appropriately and realistically mitigated
- Checking that venues used to host productions have appropriate due diligence practices in place in relation to the ancillary workers they use

Resources

- Questions for production companies to ask their suppliers ([Toolkit: Vetting suppliers appropriately](#))
- Questions for production companies to ask venues ([Toolkit: Vetting suppliers appropriately](#))
- Charge rate guidance from the Gangmaster and Labour Abuse Authority - <https://www.gla.gov.uk/media/4504/glaa-brief-59-charge-rate-guidance.pdf>
- UK Government guidance on contract types and employer responsibilities - <https://www.gov.uk/contract-types-and-employer-responsibilities>

3. Behaving well in supplier relationships

We expect productions to understand the impact that their supplier relationships and purchasing practices can have on workers.

The way that productions negotiate and work with suppliers can increase or decrease the risks to more vulnerable workers. For example, downward pressures on prices may have a direct impact on the take home pay of those already earning the lowest rates or may lead to understaffing of positions. Requirements to meet unreasonable deadlines can lead to ancillary workers doing excessive hours with inadequate breaks. And underestimating requirements (e.g. in terms of meals needed, transport provision or equipment) can put undue pressure on low-paid workers.

Examples of how to do this include:

- Taking care not to underestimate requirements in the planning stage by referring to previous productions with similar requirements or referring to experienced professionals.
- Building good and open relationships with suppliers so that they can flag any knock-on impact of the working requirements on workers.
- Not requiring suppliers to supply at below cost, including asking for discounts retrospectively.

Resources

- Good practice guidance on purchasing practices
- Factors to consider when engaging ancillary workers
- Factors to consider when renegotiating or terminating supplier contracts
- A questionnaire for suppliers to review the purchasing approach of a production (All available in [Toolkit: Behaving well in supplier relationships](#))

4. Supporting ancillary workers directly

We expect every production to treat all workers involved with respect. Central to an approach that puts human rights at its heart is meaningful engagement with those who may be negatively impacted by production activities in order to understand their experiences and to check that due diligence has been effective. Listening to the perspective of workers is one of the most effective ways of conducting due diligence.

We expect productions to take opportunities to engage directly and respectfully with ancillary workers in order to gain insights into their working conditions and ensure that they meet standards of decent work. We recognise that having such conversations can feel daunting and uncomfortable but they are important nonetheless. The TV Industry Human Rights Forum is continuing to work with stakeholders to improve the support available.

Examples of how to do this include:

- Engaging directly with workers once production has begun to check that their working conditions match expectations.
- Checking that risk assessment mitigations on worker welfare set out by suppliers have been implemented.
- Chatting regularly to ancillary workers to build rapport and check in on their welfare.
- Proactively providing information to self-employed ancillary workers about their rights by signposting them to the Just Good Work app or to additional guidance (via posters, emails or other relevant communications channels)

Resources

- Checks on workers during production ([Toolkit: Supporting ancillary workers directly](#))
- How to have conversations with workers about their employment conditions ([Toolkit: Supporting ancillary workers directly](#))
- Call it! App: www.callitapp.org
- BFI's Guidance on the Prevention of Workplace Bullying and Harassment: <https://www.bfi.org.uk/sites/bfi.org.uk/files/downloads/bfi-bullying-and-harassment-guidance-2018-02-14.pdf>
- Just Good Work app: <https://justgood.work/>
- Information for self-employed workers: www.tvhumanrights.org/self-employed-workers

5. Responding to and remedying issues identified

We expect productions to have thought through in advance how they would respond to incidents of hidden labour exploitation or other worker welfare issues that are alleged or identified. Productions should know how to respond appropriately to concerns that have been raised and to have processes in place for doing so.

It is essential to maintain a victim-focused approach in this response, i.e. prioritising the needs and welfare of (potential) victims above the needs or reputation of the production.

Examples of how to do this include:

- Identifying who the most at-risk workers are likely to be
- Scenario planning with production staff of different scenarios that could arise
- Identifying who would take responsibility in such scenarios
- Knowing who else to contact for support, advice or in the event that a crime has been committed
- Considering in advance what remedy for different scenarios would look like

Resources

- Response plan for productions ([Toolkit: Responding to and remedying issues identified](#))
- Chartered Institute of Purchasing and Supply's Tool: Making a Plan for Remediation: <https://www.cips.org/Documents/Knowledge/Procurement-Topics-and-Skills/4-Sustainability-CSR-Ethics/Sustainable-and-Ethical-Procurement/How-to-Making-a-plan-for-remediation.pdf>
- BFI's Guidance on the Prevention of Workplace Bullying and Harassment: <https://www.bfi.org.uk/sites/bfi.org.uk/files/downloads/bfi-bullying-and-harassment-guidance-2018-02-14.pdf>

Checklist of steps to take to ensure better labour practices on productions

Not all of these steps will be relevant for each production. Tick those that apply and, if you need additional guidance on taking the steps, follow the links to appropriate tools.

Pre-production		Toolkit
	Ask additional questions of potential suppliers about their labour practices	Vetting suppliers appropriately
	Carry out additional checks on any unknown suppliers	
	Communicate expectations to suppliers via email and/or in purchase orders	
Review and consider working conditions of:		
	<ul style="list-style-type: none"> Set construction workers 	Behaving well in supplier relationships
	<ul style="list-style-type: none"> Stagehands 	
	<ul style="list-style-type: none"> Cleaners 	
	<ul style="list-style-type: none"> Caterers 	
	<ul style="list-style-type: none"> Security guards 	
	<ul style="list-style-type: none"> Facilities team 	
	<ul style="list-style-type: none"> Transport workers Other 	
	Request supplier questionnaire alongside risk assessments and method statements	Vetting suppliers appropriately
	Request information from venues about their practices in relation to ancillary workers	
	Self-assess communication and grievance channels using checklist	Getting the culture right
	Conduct scenario-planning for worker welfare and labour rights incidents	
	Make a response plan for encountering modern slavery	Responding to and remedying issues identified
	Review and question risk assessments that do not address worker welfare	Vetting suppliers appropriately
Plan and resource for:		
	<ul style="list-style-type: none"> Nominated welfare contacts on set 	Getting the culture right
	<ul style="list-style-type: none"> Information on set with details of people/numbers for those needing help/advice 	
	<ul style="list-style-type: none"> Regular clinics with individuals who can respond to and address concerns 	
	<ul style="list-style-type: none"> Access to external helplines 	
	<ul style="list-style-type: none"> Access to confidential channels to raise concerns 	
During production		
	Hold a mandatory meeting at the start of production outlining commitments	Getting the culture right
	Provide information to self-employed ancillary workers about their rights via posters, emails or other relevant communications channels	Supporting ancillary workers directly
	Conduct checks on a sample of ancillary workers, using question guide provided	
	Check that risk assessment mitigations on worker welfare have been implemented	
	Compare ancillary worker response with original supplier answers	

	Regularly remind production staff and crew of the value of ancillary workers	
	Check everyone's awareness about avenues open to them to raise concerns	Getting the culture right
	Make sure ancillary workers have a point of contact among production staff	
	Document and respond to labour exploitation and abuse that falls short of modern slavery	Responding to and remedying issues identified
	Review response plan for modern slavery	
	Ensure respect for human rights when terminating or renegotiating supplier contracts	Behaving well in supplier relationships
	Acknowledge contribution of ancillary workers at wrap party or equivalent	Getting the culture right
Post-production		
	Survey suppliers to understand whether the production's practices caused any challenges to suppliers	Behaving well in supplier relationships