Close Contact Cohorts and increased screening for COVID-19
– protocol for TV production

13/07/2020

Scope

General comments
2. The guidance in this document specifically addresses an approach to support the resumption of production activity which unavoidably requires interaction within the current social distancing boundary. It sets out arrangements whereby pairs and/or small groups of people would be able to interact in much closer contact. This approach is only appropriate where all other mitigation measures are not feasible, and remains in addition, rather than a replacement for, the rigorous wider risk mitigation and hygiene measures that are set out in the broader guidance.

3. While this protocol currently applies to England and NI, and will apply in Scotland from 30 July, you should always consider whether there are local restrictions in place in your area or advice in place at the time, issued by the respective Governments, public health and health and safety authorities in the relevant jurisdiction in which the production is taking place. If so, you should first read the guidance relevant to your area as this may supersede guidance in this document.

4. This document considers how the establishment of close contact cohorts (CCCs) supported by increased screening for this group, through the establishment of routine of PCR testing (hereafter “PCR tests”), may be introduced as a key element of a risk mitigation plan. This protocol represents recommended minimum practice but other factors may dictate an enhanced level of provision. The CCC mirrors the concept of ‘fixed teams’ in the British Film Commission’s Working Safely During COVID-19 in Film and High-end TV Drama Production.

5. It is important to make clear this document provides guidance for how a CCC regime can be used as part of the wider risk assessments and safety measures that will need to be in place. It provides a framework for how to mitigate the risk where small numbers of people, a cohort, will need to breach the prevailing social distancing measures within the course of their work, through additional cohort screening. A cohort will be as small a number of people as possible who unavoidably need to be in close contact with each other. This can include both cast and crew, depending on the nature of the production. The screening regime proposed will decrease the likelihood that someone with the virus will be within the cohort. This testing would be on a regular basis (weekly) alongside other daily screening routine checks for symptoms etc. This approach offers a reasonable and sensible level of risk mitigation but it cannot eliminate risk.
6. This mitigation process is different from the concept of creating a COVID-free ‘bubble’ which this guidance does not specifically address. The bubble relies upon more stringent testing and quarantine to be applied prior to entering the, very controlled, bubble environment. The bubble approach would only be appropriate where the risk of COVID needs to be controlled to an exceptionally low level due to significant vulnerabilities of others within the bubble or other commercial reasons that could impact production delivery significantly.

7. This protocol outlines
   ○ Key principles
   ○ Testing provision
   ○ The process
     ○ Prior to arrival on Production
     ○ During Production
     ○ Screening tests during production
     ○ Positive test results
     ○ Adopting the principles of socially distancing whilst working within close contact cohorts

Key principles
8. The following key principles should be considered to establish if the CCC approach would be an appropriate risk mitigation.
   a) This approach should only be considered when all other mitigations have been considered and discounted as appropriate for the situation including adapting editorial onscreen requirements.
   b) Close contact periods must be restricted to the shortest time practicable.
   c) Expert H&S and Medical advice will need to be sought before a CCC approach is implemented and the rationale must be set out in a detailed risk assessment.
   d) Each CCC of individuals must be kept to the absolute minimum number of members possible. Members should, as far as possible on set, only mix with other members of the same cohort.
   e) A number of CCCs may be established on a single production dependent upon the interaction requirements of cast overall.
   f) Mixing or swapping between CCC should be kept to an absolute minimum. Someone can only be a member of one CCC at any one time and if someone wants to move from one CCC to another the full process for joining a CCC has to be adhered to.
   g) Consultation with those involved throughout the process of setting up these close contact cohorts is of paramount importance; individuals should clearly understand the situation and the effectiveness/limitations of the risk mitigations being introduced and where possible any requirements in relation to CCCs should be established at the casting stage. Productions should consider engaging with union representatives of those in the CCC to ensure that the implications of working in close contact cohorts are well understood.
   h) CCC members should be easily identifiable as a member of a specific close contact cohort (e.g. colour coding groups).
   i) All social distancing and other risk mitigations must be complied with by cohort members when not engaged in the specific interaction required for the production.
j) Any members of a proposed CCC or their household members (including if CCC members have caring responsibilities) who have COVID-19 vulnerabilities should be identified prior to production and appropriate adjustments made, with input from suitable experts if required to help further mitigate the risk to vulnerable groups.

k) Consideration should be given to the levels of social contact outside the production for members of a CCC and any limitations to this that may be considered appropriate, these should form part of the consultation with those involved. As a minimum members of CCCs should adhere to the wider government guidance that is in place at the time – particularly in relation to social distancing – but productions may want to review on a case by case basis and put bespoke measures in place if appropriate

l) Consideration should be given to how you quantify and record exposure of members of the CCC to each other – so accurate records of those who have worked in close proximity are readily available.

Testing provision

9. The appropriate testing for this purpose is a test for the SARS-CoV-2 virus, which causes COVID-19. These tests are commonly referred to as polymerase chain reaction (PCR) tests. Swab samples taken from the nose and back of the throat or saliva samples are examined to look for the presence of genetic material from the virus. Samples (particularly swabs) should be collected by a trained operator; analysis is undertaken in an accredited laboratory. A positive test shows that the person being tested has a current, COVID-19 virus infection. The test can take from less than an hour to several days to get a result.
   ○ For accuracy and an effective result testing/ sampling should be completed by a trained operator in line with approved methodologies and sent to an accredited laboratory.
   ○ Suitable consent will need to be sought from the individual to undertake the test.
   ○ Test results will need to be handled and managed in line with good medical practice and data privacy regulation

10. A flow chart that provides overview of the process is attached as appendix 1.

The process

Prior to arrival on Production

11. Prior to arriving on set those who are part of a CCC group will undertake a PCR test.

12. The PCR testing should be undertaken so that the time between sampling and entering the CCC is as short as is practicable. With current testing provision that will generally mean approximately 48 hours before arriving on set but that may vary depending on testing availability and timings of test results. The result of the test must be available before CCC entry and a positive result will preclude entry.

13. CCC members will be asked to adhere to social distancing requirements during the time between their test sample being taken and their arrival on set following their test result in line with the prevailing government guidance in place at the time.

14. CCC members should all confirm;
   a. they and their household members are COVID symptom free
b. there is no reason why they should be isolating (e.g. recent close contact with people positive with the virus or displaying symptoms)

15. If their pre-production test is positive CCC members will need to inform the relevant test and trace official body and self-isolate for at least 7 days from when symptoms started (if symptoms are displayed). Anyone who has a positive test but does not have symptoms must self-isolate for 14 days and follow any other up to date guidance from test and trace.

16. In line with all those working on the production all other risk mitigation measures should be followed, such as those applying to travel and accommodation. All standard daily screening measures should also be adhered to.

**During Production**

17. If a member of a CCC displays any of the symptoms of COVID-19 at any time during the production all members of the CCC will need to self-isolate and be tested.

18. The process for a positive test result should be followed as outlined in the section below.

19. However if a cohort member displays symptoms and then tests negative, they should wait until they are symptom free before returning to production.

20. If cohort members who are symptom free (but are isolating having taken a test because another member of the cohort does have symptoms) test negative, they can return to production provided they do not develop symptoms.

**Screening tests during production**

21. A regular testing programme should be introduced for the duration of each CCC. This will increase the chances of identifying infected people who are either pre-symptomatic (before symptoms start) or asymptomatic (no symptoms) and therefore limit the risk of COVID-19 transmission to others in their CCC.
   a) As standard this would be a minimum of weekly. Risk assessment of an individual or the production may indicate that more regular testing of the cohort is appropriate.
   b) The test would normally be undertaken at the production location but that is not necessary if testing can be done competently and more conveniently elsewhere.
   c) As testing is part of the regular screening programme there would be no need for an individual to isolate in the time period between a routine test and receiving the results (as long as they remain COVID-19 symptom free during this period).

**Positive test results**

22. All members of that CCC must self-isolate for 14 days and be symptom free before they can recommence activity on production, in line with government requirements.

23. Testing does not need to continue during a 14-day self-isolation period although all CCC members will be asked to undertake a new test before re-joining the CCC as if they were entering the CCC for the first time.

24. In the event of a positive test for a member of a CCC, appropriate health advice should normally be sought by the Production to investigate the precise circumstances and provide expert guidance.
25. Consideration should be given to circumstances where a CCC member tests positive, completes self-isolation and is symptom free but continues to test positive. Government guidance permits a return to work but people may continue to test positive for as much as 60 days after infection. Advice from an appropriate health professional/virologist should be sought in such circumstances.

Adopting the principles of socially distancing whilst working within CCCs

26. Whilst those within these groups are not being asked to isolate there is an expectation that they will, in good faith, maintain the key principles of social distancing throughout their daily life during the filming period;
   ○ stay at home as much as possible
   ○ limit contact with other people
   ○ maintain social distancing when outside the home
   ○ wash their hands regularly
   ○ make productions aware of any particular risk that their household members are exposed to

27. As a minimum CCC members will be required to adhere to the prevailing Government guidelines, but assessments can be made on a case by case basis to determine whether further measures may be appropriate.