



safe  
at sky

## Independent Commissions

High Risk Planning

# High Risk @Sky

Sky Leadership is committed to supporting working practices which are as safe as practicable for our people, Independent Productions, Co Productions and Subsidiary companies and their sub-contractors / freelance personnel.

Any people/ teams engaged on a Sky commission must be equipped and competent to take informed and measured risks.

Sometimes, this type of work can carry a significantly higher risk, as a consequence of operating in an environment or being part of an event or activity. Enhanced support and guidance to manage these risks allow the ambitions and goals of our business to be achieved.

This guidance is intended to ensure that production companies and their sub-contractors / freelance personnel, are made aware of, and are in compliance with, all relevant High-Risk requirements whilst working on behalf of Sky.

The full Sky Independent Commissions High Risk Policy can be found [here](#)

## Keeping it Legal

Sky is committed to doing the right thing, acting with integrity, and ensuring the highest ethical standards; we expect the same of our Independent Productions, Co Productions and Subsidiary companies. Laws are there for a reason and Sky always follows them when we are at home, and when we are abroad (where home country laws don't normally apply) we comply with local laws.

Productions should always be mindful of the in-country legal obligations and where these differ from Sky requirements then the legal requirements take precedent.

# Sky Group High-Risk Definition

**High-Risk** is defined as work that carries a **significantly higher risk** as a consequence of operating in, or being part of an environment, event or activity that is likely to directly interact with or impact the team concerned. It is possible to encounter High-Risk events, or undertake High-Risk activities in countries, regions or areas that are not normally designated as High-Risk.

## High Risk Environments

A country, region, or specified area subject to war, insurrection, civil unrest, terrorism or extreme levels of crime, banditry, kidnap, lawlessness, or public disorder; or areas with extreme climate or terrain. This includes travel advisory areas for countries that have specific safety or security risks not amounting to a hostile environment. Sky's High-Risk Safety & Security Hub (HRSSH) will interpret these levels based on local activity and context to the Sky Business Units operations.

## High Risk Events

Riots, civil disturbance or extreme public disorder, terrorist, or armed criminal incidents such as hi-jacking or sieges, any event involving chemical, biological, radiological or nuclear (CBRN) substances, industrial accidents, extreme climatic events and natural disasters such as hurricanes, severe floods, earthquakes, volcanic eruptions etc or outbreaks of serious diseases and pandemics.

## High Risk Activities

This might be where there is a high-level threat to our people, contributors or assets from authorities or protest groups, locations where we operate without accreditation, undercover, investigations, physical or cyber interviews, communications with high-risk contributors, covert surveillance or filming and/or confrontation of terrorist, serious organised criminal, extremist, violent political groups or as a result of their gender/ age/ ethnicity/ religious beliefs/ nationality/ disability.

# High-Risk Governance @Sky

Every person working for, or on behalf of Sky has a duty to look after themselves and others conducting High-Risk work – this also includes anyone who might be impacted by our work.

There are defined areas of responsibility, shared across the Sky Group, from Senior Executives through to the individual and those working on behalf of Sky. It is essential that everyone understands and acts on their responsibilities. In addition, there are teams within Sky that can provide technical expertise to support these unique and critical risks, namely the Sky Group High-Risk Safety and Security Hub.

## **Sky High-Risk Safety & Security Hub (HRSSH)**

Sky's High-Risk team provide specialist High-Risk security, travel, and health subject matter expertise, advice, guidance and support to Sky Commissions conducting High-Risk work. Nobody should conduct High-Risk work without the right planning, support, training, and approvals from the business.

The Sky Commissioning Editor, Production Exec or Manager will coordinate involvement of Sky's High-Risk Team early in the production process.

The level of involvement from HRSSH will vary and be dependent on Sky's relation with the Production Company.

# Partenored and Independent Productions

## Managers / Producers of independent production companies conducting High-Risk work are responsible for:

- Where relevant, appointing a suitable high-risk filming consultant (competent person) to assist the Producer in assessing and controlling the risks on a production.
- Ensure a suitable Risk Assessment is completed and the residual risk level identified and agreed upon in a timely manner with Sky.
- Responsible as an employer for complying with all health and safety legislation, legal and regulations.
- Affording Sky all necessary co-operation and assistance in the implementation of this Policy.
- Understanding and complying with all relevant requirements stipulated in any Agreement, Contract or Production documentation supplied by Sky.
- Ensuring appropriate security controls are in place when handling pre-release content.
- Ensure employees, freelancers and contractors are physically, mentally fit, capable to travel.
- Ensuring individuals have appropriate personal protective equipment to fit the situation and reduce the risk of harm.
- Ensure that personnel are suitably trained and competent prior to the conducting of any work activities and any Sky mandated High-Risk training is attended.
- Ensure to obtain a travel medicine assessment pre-deployment and if travelling regularly ensure vaccinations are up to date.
- Ensuring Production teams follow policies, procedures, and risk assessments at all times.
- Notifying Sky in a timely manner of any significant accidents, incidents or near misses occurring on a production.
- Vulnerable adults, young people and children are covered separately by Sky's safeguarding and Compliance Pack which can be found [here](#).

# Risk Assessments for High-Risk Deployments

- When planning High-Risk work, a recorded Risk Assessment must be completed by the Production company for their commissioned production and the residual risk level identified and agreed upon in a timely manner with Sky. It's important that the key risks are highlighted. **All required counter measures must be fully implemented prior to the start of filming.**
- The independent production companies appointed competent person must record in writing the significant findings identified in the risk assessment(s) as arising out of or in connection with the production and convey the preventative and protective measures to all personnel and any third parties who may be affected by the production work.
- The Production company must also ensure that all companies that they contract for specialist services/works as part of their commissioned production supply them a suitable and sufficient risk assessment for such works for review by Sky.
- For those who do not have access to a High-Risk related risk assessment template or require further advice, please speak to your Sky Production Representative.
- All production personnel and suppliers must be asked to read and acknowledge the risk assessment and agree with the proposed assignment and the mitigation control measures. The acceptance method must confirm that they have read, understood, and will follow the mitigation measures as outlined in the document.

# High Risk Mitigations

## Competent People

- It is the Production Companies responsibility to ensure their staff are competent, experienced and trained prior to any deployment on High-Risk work.
- For High-Risk Environments, its Sky's Policy that all deploying people must have completed a Hostile Environment & First Aid Training (HEFAT) course that has been approved by Sky's HRSSH. The skills must be refreshed at least every three years to ensure ongoing competence.
- Further guidance on training requirements should be obtained from Sky.

## Cast & Contributors

- Productions should be tailored to suit the likely needs of contributors. Competence must be determined on experience, training and manner in which the Production will be filmed.
- It may not be apparent until part way through pre-production/selection process that a likely contributor is at risk. Production companies should strongly encourage contributors not to take unnecessary risks to obtain material. Their associated risks must be factored into any High-Risk Assessment.
- Vulnerable adults, young people and children are covered separately by Sky's safeguarding and Compliance Pack which can be found [here](#).

## Personal Identification

- It is a Sky requirement that those who are likely to be deployed to a High-Risk environment, event or activity are provided the opportunity to provide specified personal data. This information will aid to identify people during a crisis/injury/missing person scenario.
- The responsibility for capturing appropriate personal data lies with the Partner or Independent Production company carrying out the High-Risk work. Personal details for each person deployed must be recorded accurately prior to the start of the task or assignment.

## Digital Security

- When making high-risk productions, cyber threats are a real and genuine danger. Suitable arrangements should be in place for Information Security and Data Protection and sharing of any content or other data with Sky.

# High Risk Mitigations

## Contingency Planning

- Productions are responsible for having plans in place commensurate with the activity.
- The need for a robust communications plan including an agreed check in plan and agreed escalation procedures
- Where there is a risk of ineffective communications, deploy alternate communication methods
- Consideration to the use of tracking systems
- A well understood contingency plan for dealing with emergencies
- A thorough medical emergency plan and appropriate insurance

## Psychological Safety, Trauma & Resilience

- Sky recognises that by operating in High-Risk, or high threat locations, conducting High-Risk Activity, or when working with vulnerable contributors in a non-high-risk location, people are often front-line witnesses or exposed to many types of events, trauma, natural disasters, conflict, or hostilities.
- Sky has a duty of care to those working on our behalf. All Productions conducting High-Risk work are responsible for ensuring they follow the Compliance Contributor Policy found [here](#).

## Personal Protective Equipment

- Production companies are responsible for ensuring they remain compliant with applicable laws and regulations that govern international trade controls and economic sanctions.
- Ensuring the correct levels of high-risk specialist equipment are provided and made available to all those working on their behalf.
- Ensure equipment is suitable for use, and for the purpose and conditions in which it is to be used.
- Adequate training should ensure that those who use the equipment are competent to use it safely. This includes ensuring they have the correct skills, knowledge, and experience.

## Safety & Security Resource

- There are occasions when the Production company may require additional specialist safety and security resources to advise or accompany the production such as a high-risk conflict zone, a country or region lacks available medical care or where there is poor infrastructure support.
- Only vetted, licensed, and appropriately experienced and qualified resource should be used. Sky's HRSSH are on hand to guide and advise on appropriate resource.