



## Location due diligence: factoring in human rights - Draft v1.3

### Introduction

Locations are selected for different reasons and in different ways. For sporting events, the broadcaster and production teams are unlikely to have any say in the countries or venues selected. Factual and factual entertainment may require filming where particular individuals or species are located, giving them less choice too. For drama and entertainment shows, costs, tax credits, permissions and the availability of local infrastructure are key factors, alongside the visual suitability of a place.

Those sourcing locations may be working with a location brief and, once selected, a production should then follow up with a location risk assessment, using recce, desk research and local insight.

This document provides additional questions to consider for those involved in sourcing, selecting, risk assessing or visiting locations, to ensure that human rights risks are factored in. It is based on discussions facilitated by the Forum at a meeting in September 2024. The questions are divided into four sections: Contextual risk; Location-specific risk; Activity and content risk; Knock-on impacts.

It is essential also that sufficient training, support and resources are given to location managers who may be under considerable pressure to address risks and/or to used untested locations.

### Human rights due diligence on location

Under the [UN Guiding Principles on Business and Human Rights](#), all companies should undertake 'human rights due diligence', which involves:

- understanding and assessing human rights risks and impacts
- taking meaningful steps to address those risks and impacts
- tracking and monitoring the effectiveness of steps taken
- communicating and reporting on the steps taken and their effectiveness

For locations, this means considering what impacts could occur to people as a result of the features of a location and the production activities that might occur there. As well as risks to cast, crew and contributors/participants, it is also essential to consider risks to ancillary workers (who are not always considered as part of crew), to local communities and to any studio audiences.

Failing to address human rights risks exposes productions to additional costs, delays and safety incidents that could otherwise have been mitigated. Many issues will already be well addressed but related aspects could be overlooked. Three examples to consider:

1. If the location used is known to be at risk of high heat, there might be good mitigations planned for crew but perhaps the security guards used for the perimeter are overlooked.
2. If filming is happening in a hot dry area, there might be work done to ensure the production is well supplied with water but perhaps its diversion from local community use is not considered.
3. If filming is happening in a remote location away from grid electricity, there might be a plan to use generators but the additional stress on those responsible for maintaining generators that support an entire production may not have been factored in.

## Contextual risk

In any country, there will be geopolitical, environmental and other contextual risks that should be factored into location planning and risk mitigation activities.

Issue	Human rights questions to ask
Area at risk from conflict or bilateral tensions, including border areas and disputed territories	<ul style="list-style-type: none"> <li>• Is there a risk that the production could exacerbate existing tensions in some way and/or affect local communities?</li> <li>• Are there particular safety and security risks to crew and how easy is it to identify unsafe geographies?</li> <li>• Are there particular safety and security risks to local crew (including after production has finished)?</li> </ul>
Area at risk from civil unrest and strikes or electoral and political instability	<ul style="list-style-type: none"> <li>• Are there forthcoming elections, political decisions or debates that risk sparking civil unrest?</li> <li>• How might public security forces behave in the face of civil unrest?</li> <li>• Are there particular safety and security risks to crew?</li> <li>• Are there particular safety and security risks to local crew (including after production has finished)?</li> </ul>
Weak legal/regulatory framework on safety, employment conditions, working practices, environment	<ul style="list-style-type: none"> <li>• How will high standards of safety, working practices and environmental protection be maintained?</li> <li>• How will high standards extend to ancillary workers providing support services, such as security, cleaning, set construction and driving?</li> </ul>
Country discriminates against some groups, e.g. women, LGBTQ+	<ul style="list-style-type: none"> <li>• How might discriminatory language or practices affect the cast, crew, local crew, participants and ancillary workers?</li> <li>• What opportunities are there to mitigate contextual discrimination against some groups?</li> </ul>
Presence of vulnerable groups, e.g. large number of migrant workers or refugees, indigenous communities, homeless people	<ul style="list-style-type: none"> <li>• Could the production affect vulnerable groups in some way (e.g. homeless people cleared away)?</li> <li>• Is there a higher risk that people providing support services, such as cleaning or catering, are experiencing exploitation?</li> </ul>
Extreme weather – e.g. heat, snow/ice, storms, high winds	<ul style="list-style-type: none"> <li>• How will cast, crew, local crew, participants be protected from extreme weather, including those in set construction and others who may be working outside for extended periods?</li> <li>• How will ancillary workers (e.g. security guards, drivers) be protected from extreme weather with adequate clothing, shelter/shade, breaks etc?</li> <li>• How would extreme weather affect the safety of a set, e.g. high winds?</li> </ul>
Natural hazards – e.g. wildfire, flooding, sandstorms, insect bites, risk from animals	<ul style="list-style-type: none"> <li>• How will cast, crew, local crew, participants and ancillary workers be protected from risks related to natural hazards?</li> <li>• Are there steps the production can take to reduce the impact of such hazards or to avoid making them worse?</li> </ul>
Disease and health risks – e.g. Zika virus, haemorrhagic fevers, local outbreaks of contagious disease	<ul style="list-style-type: none"> <li>• Is there up-to-date disease monitoring available?</li> <li>• Are there particular individuals who might be more at risk, e.g. someone with an underlying health condition?</li> <li>• Is there a strong local healthcare system able to support anyone involved in a production, including ancillary workers?</li> </ul>

## Location-specific risks

The location itself will have features that could have human rights consequences. A production might take place in a busy built-up area, perhaps affecting local economic activity, or it might take place somewhere remote, far from communities but with greater risks to crew from isolation.

Issue	Human rights questions to ask
Land use for filming temporarily displaces people (physically, economically or culturally)	<ul style="list-style-type: none"> <li>• How is the space currently used and how does this change at different times of year, e.g. grazing rights?</li> <li>• Is any of the land to be used under dispute, e.g. between local government and indigenous communities?</li> <li>• Has any of the land used for filming temporarily deprived communities of access to resources or a means of livelihood?</li> <li>• Does the land have any cultural significance to local communities?</li> <li>• Is the location close to any schools, religious sites or healthcare facilities and will filming temporarily prevent people from accessing any of these?</li> <li>• What stakeholder engagement has taken place with local communities or is still needed?</li> </ul>
Resource availability, e.g. electricity, water, communications networks, sewage and waste facilities	<ul style="list-style-type: none"> <li>• How might a production's use of resources affect local communities (e.g. water use in a drought-affected area)?</li> <li>• Does the production risk high quantities of waste or pollution into local water sources, soil or air?</li> <li>• Will there be hygienic conditions and sanitary facilities for everyone on a production, including those involved in set up and strike days, people providing ancillary services and anyone needing accessible toilets?</li> <li>• Will the production take place sufficiently close to emergency services for anyone involved in the production to access help if required?</li> </ul>
Local habitats and ecosystems	<ul style="list-style-type: none"> <li>• Are there any flora or fauna at risk from the production or who could harm cast, crew or ancillary workers?</li> <li>• Are there any biodiversity events (e.g. breeding, hatchings, periodical emergings) that could coincide with the production?</li> <li>• Is there a risk of destroying land or forest or affecting waterways in the course of filming?</li> </ul>
Relationship of local communities to security providers	<ul style="list-style-type: none"> <li>• What is the attitude of local communities towards private security providers and or public security such as police?</li> <li>• Is there a climate of fear or a risk of conflict between the security used for a production and local communities?</li> </ul>
Timing coincides with holidays, events, cultural or religious festivals	<ul style="list-style-type: none"> <li>• Could the production disrupt local events or be disrupted by them?</li> <li>• Could the presence of a film crew be culturally insensitive during particular holidays or events?</li> </ul>
Relationship with location provider	<ul style="list-style-type: none"> <li>• How much notice and information about potential risks has been shared with location providers (e.g. heritage buildings, schools)?</li> <li>• How will members of the public or those working at a location be safeguarded appropriately?</li> </ul>
Production occurs in a remote location	<ul style="list-style-type: none"> <li>• How can the mental health of cast, crew and ancillary workers operating in a remote location for an extended period be supported?</li> <li>• What communications networks, healthcare or medical facilities are available for general use and in emergencies?</li> <li>• How will adequate food and other supplies reach cast, crew, local crew, participants and ancillary workers?</li> </ul>
Reliance on generators	<ul style="list-style-type: none"> <li>• How will crew responsible for generators manage additional stress and pressure if the whole production relies on their functioning?</li> <li>• How can the environmental impact of generator use be reduced?</li> </ul>

Use of buildings and their safety	<ul style="list-style-type: none"> <li>• Are the buildings structurally safe to film in?</li> <li>• Is there a risk that asbestos or other toxic materials could be present?</li> <li>• Are the buildings sanitary for those working in them?</li> </ul>
Accessibility, including for cast, crew, participants and studio audiences	<ul style="list-style-type: none"> <li>• What reasonable adjustments are needed by the cast, crew, local crew or participants for a production?</li> <li>• What are the accessibility issues of a location, e.g. uneven ground, lack of lifts?</li> <li>• Are there accessible facilities vehicles available to the production?</li> <li>• Are there accessible toilets within easy reach?</li> <li>• Should the production hire an Access Coordinator for this production?</li> </ul>

## Activity and content risk

The nature of production activities themselves can also lead to human rights risks, both in relation to how the production is carried out and the content that is filmed.

Issue	Human rights questions to ask
Large-scale set construction	<ul style="list-style-type: none"> <li>• How will local workers be engaged for set construction (under what employment conditions) and might the activities take them away from any essential activities, e.g. crop planting, harvesting etc?</li> <li>• What safety practices will be in place and how will these be monitored effectively?</li> <li>• Will there be run-off of paint or chemicals that could pollute soil and water?</li> <li>• Will there be large quantities of waste produced?</li> </ul>
Large number of vehicles, especially heavy goods vehicles	<ul style="list-style-type: none"> <li>• Will local communities, particularly children, be in proximity to and therefore at risk from the movement of large vehicles?</li> <li>• What are the risks to local flora and fauna from vehicles, e.g. ground compaction, habitat destruction, noise and disturbance?</li> <li>• What will the impact be on local fuel supplies in terms of availability and cost for local communities?</li> </ul>
Hazardous activities and special effects, e.g. explosions	<ul style="list-style-type: none"> <li>• Could any filming activities cause fear or terror in local communities if they are not pre-warned?</li> <li>• Are there risks of damage to a location as a result of filming activities?</li> <li>• Will noise adversely affect local communities, their livestock and wild fauna?</li> </ul>
Crowd scenes	<ul style="list-style-type: none"> <li>• What disruption to local economic activity will be caused by large crowd scenes being filmed?</li> <li>• What will the impact be on local food supplies in terms of availability and cost for local communities if there are large numbers of visitors on site for a production?</li> </ul>
Use of drones or aerial footage	<ul style="list-style-type: none"> <li>• Will the privacy of local communities be violated by filming from the air?</li> </ul>
Donations to local communities	<ul style="list-style-type: none"> <li>• Are any donations made to local communities (e.g. of used equipment or leftover materials) appropriate and without knock-on environmental impacts?</li> </ul>
Content stirs up dispute or leads to 'reputation washing'	<ul style="list-style-type: none"> <li>• Are there aspects of content that could cause tensions in relation to where it is filmed, e.g. historical contentions, religious sentiments, disputed territories?</li> <li>• Does filming in an area require giving credit to governments known for human rights abuses, e.g. Xinjiang Province in China or Saudi Arabia?</li> </ul>

## Knock-on impacts

TV productions can also impact a location after filming has taken place and as a consequence of its popularity after a show is transmitted. These impacts can be positive or negative, short-lived or long-lasting, and are often hard to anticipate. How to address such issues responsibly

Issue	Human rights questions to ask
Screen tourism	<ul style="list-style-type: none"> <li>• Would an influx of tourists to an area be welcomed by the local community?</li> <li>• Is the community equipped to welcome screen tourists in terms of managing crowds, costs of fuel and food, and maintaining a balance with local needs?</li> <li>• Is there a risk of environmental damage if there were to be an influx of screen tourists?</li> </ul>
Reputation and portrayal	<ul style="list-style-type: none"> <li>• Does the production risk unfairly portraying an area or stereotyping its inhabitants?</li> <li>• Does the production risk giving a negative reputation to a place could suffer as a result?</li> </ul>
Copycats	<ul style="list-style-type: none"> <li>• Does the production risk fans copying dangerous or iconic actions at particular locations at personal risk to the fans and with consequences for local communities?</li> </ul>

## Resources

The lists of questions provided here should help with the first aspect of human rights due diligence – understanding and assessing risks to people. It is then essential to put in place adequate steps to prevent human rights impacts occurring and mitigate any remaining risks.

The below resources provide additional guidance to support next steps.

### Resources from other organisations

- Location Access Guides (Exterior and Interior) available as part of the TAP toolkit: <https://bit.ly/TAP-toolkit>
- The Mark Milsome Foundation Film and TV Safety Passport course - <https://www.markmilsomefoundation.com/healthandsafety/>
- The Whole Picture Toolkit from the Film and TV Charity - <https://filmtvcharity.org.uk/get-support/support-for-organisations/the-whole-picture-toolkit/>
- HSE information sheet on Building used for locations or temporary studios in film and television - <https://www.hse.gov.uk/pubns/etis18.pdf>
- Locations branch of Bectu - <https://bectu.org.uk/>

### Relevant Forum resources

- Short country summaries of contextual human rights risks in [Hungary](#), [India](#), [Poland](#), [Romania](#), [Saudi Arabia](#), [South Africa](#), [South Korea](#) and [USA](#)
- Meaningful stakeholder engagement – [Taking human rights into account when dealing with people around a TV production](#)
- Inclusive security practices – One-page aide memoire on [Inclusive personal safety on location](#), guidance outlining [Inclusive security risk management](#) for TV productions and a short discussion paper on [Inclusive security practices](#).
- [TV production and remedy](#) – a discussion paper exploring broadcaster and production company responsibilities for remedying human rights harms when things go wrong
- Sustainability and human rights – a discussion paper exploring the opportunities and overlaps between the [sustainability and human rights](#) agendas