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MO8 Roads & Transport Policing Command

Metropolitan Police Film Unit

Protocols to Filming on location

Version 5

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Introduction

The purpose of this document is to provide clarity for production companies and Location Managers that plan to film in London, as to when a police presence is and is not required during filming. It also provides the same protocols to Borough Film Services for use when considering filming requests to film within their respective boroughs.

The Metropolitan Police Service (MPS) Film Unit manages complex commercial filming across London and provides officers where filming is taking place on location in London and the filming requires police assistance. Annually the Film Unit provide officers for approximately 2000 filming days and is part of the Film London Partnership, supported by the Department of Culture, Media and Sport, the MPS, the Mayor Of London and Film London.

The MPS Film Unit work very closely with Film London and supporting, enforcing their Code of Conduct, Film offices, local authorities and outside agencies.

For productions planning extensive action sequences, the MPS Film Unit will liaise with the production to enable a 'joined up' approach, reducing risk and ensuring the safety of the public along with that of the cast and crew.

When on location in London, there are seven types of filming that may require a police presence:

- **Filming with weapons**
- **Filming with replica /real/ imitation / airsoft firearms**
- **Filming with actors / extras in police uniform**
- **Filming with replica / fake police/emergency vehicles**
- **Filming scenes of crime or violence**
- **Filming real or perceived nudity**
- **Filming with issues of public safety**

Filming with replica, real & imitation firearms

Please refer to...

HSE Management of Firearms and Weapons in film and TV productions.

The MPS Film Unit must be consulted in advance of any filming.

Supply of replica / imitation or airsoft firearms

The MPS Film Unit advise in the first instance that all replica/imitation or airsoft firearms should be from a Registered Firearms Dealer (RFD), or a correctly licensed supplier that is a Company whose business is to supply replica / imitation or airsoft firearms to film, television and theatrical productions.

Use of replica / imitation or airsoft firearms

For all production work, a Film Armourer must be engaged where a firearm that requires a licence or certificate is to be held or used by someone who is not working within the privileges of their own licence, such as an actor. The Film Armourer must be competent and experienced in such work. Holding licences or shotgun and firearm certificates does not qualify a person to be an armourer.

A Film Armourer is a Registered Firearms Dealer (RFD) or their agent or another properly authorised person, who is insured to provide firearms for use in film and TV productions.

The safety and security of Replica/imitation/airsoft firearms should be treated in the same way. The production must seek the advice of the relevant weapons expert to make sure that adequate information, instruction and training is given to all those involved with, or affected by the use of the weapon. The production must ensure a written risk assessment is in place which clearly identifies the controls for the procurement, transportation, storage, crew and artiste briefings, handling, and disposal. All production personnel must follow the instructions. All weapons must be accounted for at all times.

Notifying Police (FILMWEAPON CADS)

If a replica /real/ imitation firearm is to be used in, heard or seen in or from a public/private place or where the public have rite of passage, the production must make sure that the MPS Film Unit have been informed, and that a point of contact for them is nominated, e.g. the Film Armourer. Keeping the police informed will prevent possible misunderstandings involving police armed response units and reduce the likelihood of public distress and possible breach of the peace.

The production must obtain a **FILMWEAPON CAD** reference number from the MPS Film Unit. The number is unique to each date and location of filming and the CAD ensures that local police as well as armed response units are aware of the filming taking place with replica / imitation / airsoft firearms.

** CAD is an MPS acronym for Computer Aided Dispatch*

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TASERS

Real/practical Tasers are classed as Section 5 firearms so can only be supplied, handled by a licensed armorer. Replica, imitation Tasers used for film and TV will be treated like any other replica, imitation firearm, weapon in that they will need to be covered by a FILMWEAPON CAD.

IMPORTANT: When productions are filming in London, DO NOT call 101 for filming with firearms/weapons or any filming enquiry. All requests/enquiries MUST be directed to the MPS Film Unit during working weekday office hours (09:00 - 17:00).

Filming outside of London, please contact the local Police Service.

Airsoft Gas

Gas is often used with replica airsoft pistols to create more realistic functionality. However, there have been cases whereby the gas has combusted on set putting cast and crew in danger. *Green Gas* is generally composed of 90% propane, meaning it is highly flammable. The MPS Film Unit advise that productions, armourers, and responsible persons using airsoft gas on set are aware of the dangers, have carried out thorough risk assessments, and are fully accountable for its use.

Gas on public transport

Such products would be considered *dangerous goods* under Public transport by-laws and agreements, and therefore unlikely that the carriage of airsoft gas would be permitted. The MPS Film Unit advises productions, armourers, and persons responsible contact their mode of transport to ensure the carriage of airsoft gas would be permitted. It is also expected that any carriage of gas is fully assessed for safety reasons, including utilising the correct storage to ensure it is secure, out of direct sunlight, and unlikely to ensure exposure to any items likely to cause combustion.

The following list are Airsoft Gases legally available in the UK;

Duster Gas - low power and commonly used for close range and indoor skirmish setups.

Green Gas - Higher power than Duster Gas, and 90% propane composition. Often used on film sets.

Red Gas - For outdoor use and cold weather. Higher power than Green Gas and not compatible with all airsoft weapons. Not for close range.

Black Gas - Higher power than Green Gas and higher propane composition. For outdoor use. Not compatible with all airsoft weapons. Not for close range.

Antique Firearms

There have been instances where productions have self-purchased Antique firearms under Section 58 Firearms Act 1968 for use as props. Productions must be mindful that the legislation states “*sold, transferred, purchased, acquired or possessed as curiosities or ornaments*”. Due to the complexities of legislation and interpretation The MPS Film Unit would advise any production considering this as an option should firstly contemplate

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hiring the firearm from a respected industry weapon and prop supplier, or have an armourer on location.

Some Antiques have since lost their classification under this act and would therefore be reclassified as a real firearm, making possession unlawful (unless licensed). It is still an offence to possess an Antique firearm in a public place, and the MPS Film Unit will treat Antique firearms like any other firearm, requiring an assessment and issue of a FILMWEAPON CAD, or, if in public view or public place, a police presence also.

Deactivated Firearms

These were once real firearms and have since been decommissioned officially, with accompanying paperwork to prove this. These are legal to own, however considered a '*replica firearm*' under the MPS Film Unit Protocols, and therefore will be treated like any other replica firearm.

Please contact the MPS Film Unit as a police presence may be required.

Protocols

- FILMWEAPON CADS ARE REQUIRED WHEN FILMING INTERNALLY AND OUT OF PUBLIC VIEW.
- All replica / imitation firearms are supervised at all times and controlled on set by the Film Armourer or responsible production person.
- In the event there is no designated armourer there must be an individual named on the Risk Assessment who will be taking sole responsibility for the replica weapons and their conveyance. Include a secondary individual in the event the initial responsible person is unable to fulfil their role at short notice (ie sickness).
- If not a designated armourer, firearms are transported in a clear box marked with PROPS, and are then placed into a secure, non-transparent carrycase/rucksack/holdall which will be closed at all times during carriage and zip tied.
- Be in possession of relevant documentation that confirms their use and justifies their carriage to and from location (including FILMWEAPON CAD reference).
- Any replica / imitation firearms are not removed or taken from set.
- Any replica / imitation firearms are not left unattended.
- The MPS Film Unit will require Armourers name, company name and phone number or responsible person's name and number for the FILMWEAPON CAD.

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We will also require type of firearms, amount of firearms on location, do you plan to discharge, if so how?

- All crew in Hi-visibility jackets.
- Public Awareness Filming signs.
- Permissions granted by land owners/borough film office.
- Local resident's letter dropped.
- Secured in lockable storage overnight at the location with owner/land owners permission if remaining on location for continuous filming.

Filming with weapons

Please refer to...

HSE Management of Firearms and Weapons in film and TV productions Sheet No 20

The MPS Film Unit must be consulted in advance of any filming.

A weapon includes any object which is designed for the purpose of inflicting bodily harm such as crossbows, catapults, any sharp-edged instruments used in a fight sequence (swords and knives) or martial arts weapons (such as rice flails) and batons, battering rams, swords, spears, longbows. This guidance also covers articles such as replica weapons and props which are not designed specifically for inflicting bodily harm but which may pose such a risk when used as a weapon.

Please contact the MPS Film Unit as a police presence may be required.

Protocols

- FILMWEAPON CADS ARE REQUIRED WHEN FILMING INTERNALLY AND OUT OF PUBLIC VIEW.
- All replica / imitation weapons are supervised at all times and controlled on set by the Film Armourer or responsible production person.
- In the event there is no designated armourer there must be an individual named on the Risk Assessment who will be taking sole responsibility for the replica weapons and their conveyance. Include a secondary individual in the event the initial responsible person is unable to fulfil their role at short notice (ie sickness).
- If not a designated armourer, weapons are transported in a clear box marked with PROPS, and are then placed into a secure, non-transparent carrycase/rucksack/holdall which will be closed at all times during carriage and zip tied.
- Be in possession of relevant documentation that confirms their use and justifies their carriage to and from location (including FILMWEAPON CAD reference).
- Any replica / imitation weapons are not removed or taken from set.

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- Any replica / imitation weapons are not left unattended.
- The MPS Film Unit will require Armourers name, company name and phone number or responsible person's name and number for the FILMWEAPON CAD. We will also require type of weapon (kitchen knife, nun-chucks, baton, axe etc), how many, its construction (real, rubber, plastic etc).
- All crew in Hi-visibility jackets.
- Public Awareness Filming signs.
- Permissions granted by land owners/borough film office.
- Local resident's letter dropped.
- Secured in lockable storage overnight at the location with owner/land owners permission if remaining on location for continuous filming.

Filming with actors and support actors in replica Police uniforms

The MPS Film Unit must be consulted in advance of any filming.

The law on "impersonating police"

Section 90 of the Police Act 1996 creates offences of impersonating a police officer or unlawfully possessing/wearing articles of police uniform.

- 90(1) Any person who with intent to deceive impersonates a member of a police force or special constable, or makes any statement or does any act calculated falsely to suggest that he is such a member or constable, shall be guilty of an offence.
- 90(2) Any person who, not being a constable, wears any article of police uniform in circumstances where it gives him an appearance so nearly resembling that of a member of a police force as to be calculated to deceive, shall be guilty of an offence.
- 90(3) Any person who, not being a member of a police force or special constable, has in his possession any article of police uniform shall, unless he proves that he obtained possession of that article lawfully and has possession of it for a lawful purpose, shall be guilty of an offence.

Please contact the MPS Film Unit as a police presence may be required.

Protocols

If filming in a public/private place or an area that can be overlooked, please ensure that:

- Any SAs who own their own police costume do not travel to and from set wearing it.
- Any actors or SAs wearing police costume do not leave the set whilst wearing it.
- Any actors or SAs cover the uniform between takes.
- Productions who require SA to play the role of Firearms officers or Taser trained officers are to make this known to the MPS Film Unit so a FILMWEAPON CAD (page 6) can be issued.
- Any actors or SAs wearing police costume act in a sensible and appropriate manner and do not bring the uniform and police service into disrepute.

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- All crew in Hi-visibility jackets
- Film signs
- Permissions granted by land owners/borough film office
- Local resident's letter dropped.

Police Batons

A police 'friction lock' or 'acrylic' baton is a 'made' offensive weapon as defined by the Prevention of Crime Act 1953. Therefore actors or SA's are only to be in possession of a working baton when on set and filming. If found in possession when off set or travelling to or from filming, they could be arrested for possession of an offensive weapon.

Plain Clothes Police Officers

Actors & SA's playing the role of plain clothes Police will be acceptable if they are not in possession of a belt kit and/or stab vest or any other police equipment. Having, wearing this equipment will portray someone impersonating a Police Officer so the MPS Film Unit will need to be consulted and the same course of action by the unit will possibly apply.

If not in possession of Police equipment but the scene involves them effecting an arrest or any other scene of assault then the MPS Film Unit must be consulted.

Filming with replica Police/Emergency vehicles/Wet Downs

The MPS Film Unit must be consulted in advance of any filming using replica / fake police vehicles on public roads, and filming will not be approved without the presence of Mobile Police Support.

The MPS does not hire out police vehicles to third parties, however there are several London and home county companies involved in this line of business.

It is the **responsibility of the production** to check that the Action vehicle company possesses the correct documentation to provide Police action vehicles on a public/private road/place.

Protocols

When being driven on public roads to and from the filming, the following steps are taken to ensure that replica / fake police vehicles are not mistaken for genuine police vehicles:

- Any external 'POLICE' graphic is thoroughly taped over with black masking tape.
- If the light bar is surrounded by blue plastic, that it is covered from view.
- If blue beacon lights are fitted, that they are covered from view.
- Tones are not allowed at any times.
- Action vehicle companies should make sure that the production they are working with have the correct permissions/license issued by the local authority to film with replica Police/emergency vehicles. This task should be done before a contract is agreed.
- All crew in Hi-visibility jackets.
- Public Awareness Filming signs.
- Permissions granted by land owners/borough film office.
- Local resident's letter dropped.
- USE OF TONES IS NOT PERMITTED.
- Clear light bars that are only blue when switched on, may remain uncovered whilst in transit.

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- Consider transporting the vehicle on a low loader.
- The driver of the action vehicle MUST NOT be wearing Police uniform transporting to and from location.

Use of blue lights when filming

Mobile Police Support will be required. Action vehicle blue lights may only be used when it is safe to do so, no other vehicles will be affected and only when authorised by the officers escorting.

Clear light bars that are only blue when switched on, may remain uncovered whilst in transit.

Action vehicles cannot use emergency services exemptions to road traffic regulations, or use sirens.

Failure to adhere to the above could result in the driver and vehicle company, committing offences under Road Vehicles Lighting Regulations 1989 and/or Section 90 Police Act 1996 and be liable to prosecution.

USE OF FIRE APPLIANCES TO SUPPLY WATER/WET DOWNS ON LOCATION

It is well known within the film and TV industry, to simulate rain, wet weather effects, the hire of a fire appliance vehicle, water bowser is used. These vehicles are sometimes also used as action Fire engines.

It is very important to note that these vehicles and the personnel that come with them comply with relevant legislation to avoid any potential Police prosecution.

It is also important for productions to risk assess the use of these vehicles on open and closed roads. Standing water after a wet down is a hazard and a danger to other road users

Driver hours - regulation ec 561/2006

[Regulation \(EC\) No 561/2006 of the European Parliament and ...](#)

Use a goods vehicle for reward or in connection with a trade or business without an operator's licence - Contrary to section 2(5) of the Goods Vehicles (Licensing of Operators) Act 1995

[Goods Vehicles \(Licensing of Operators\) Act 1995](#)

Use of a tachograph - Fail to use a tachograph record sheet/Driver card - Contrary to section 97(1)(a) of the Transport Act 1968.

Section 97 - Transport Act 1968

The Road Vehicles Lightings Regulations - Contrary to regulation 16 of the Road Vehicles Lighting Regulations 1989, section 42 of the Road Traffic Act 1988 and Schedule 2 to the Road Traffic Offenders Act 1988. The Road Vehicles Lighting Regulations 1989 Interpretation of emergency vehicle, A motor vehicle of any of the following descriptions- (a) a vehicle used for fire, brigade, ambulance or police purposes.

Drive a relevant vehicle on a road prior to completing/ after five years of a certificate of professional competence - Contrary to regulation 10(1) and (3) of the Vehicle Drivers (Certificates of Professional Competence) Regulations 2007.

The Road Vehicles Lighting Regulations 1989

Fire and Rescue Services Act 2004

EC regulations 165/2014 & 561/2006 cover the use of tachographs and the driver's hour's rules.

Reg 165 imposes a requirement that a driver keeps accurate records of work covering the previous 28 days. Therefore an occasional driver is required to record their normal 'day job' as other work.

Additionally a driver required to comply with certain rest periods under Reg 561.

They can record this by either block recording a week's activity on a tachograph printer paper or via entering manually on a tachograph vehicle unit.

Filming scenes of violence/crime

The MPS Film Unit **must be consulted in advance of any filming.**

The concern when filming scenes of crime or violence is that members of the public do not realise that filming is taking place and think that the event is 'real' and either call the police or intervene themselves. Scenes of violence can be from mild implied or actual force or scenes of severe disorder.

Please contact the MPS Film Unit as a police presence may be required

Protocols

Please ensure that:

- The film crew wear high visibility clothing so that it is obvious to members of the public that filming is taking place.
- Suitable signage is used so that the public are aware of the nature of the filming.
- Local residents are leafleted in advance so that they are forewarned of the filming.
- Adequate stewards are present for public re-assurance and to preserve the security and safety of the film set.
- Any weapons will require a FILMWEAPON CAD.
- May require Traffic Management, road closure authorised by the local authority.

Filming nudity or perceived nudity

The MPS Film Unit must be consulted in advance of any filming.

If scenes of nudity or perceived nudity are to be filmed in public or in a private place which can be overseen or overlooked, the production must make sure that the police have been fully informed and that a point of contact for them is nominated.

Please contact the MPS Film Unit as a police presence may be required.

Protocols

Please ensure that:

- The film crew wear high visibility clothing so that it is obvious to members of the public that filming is taking place.
- Suitable signage is used so that the public are aware of the nature of the filming.
- Local residents are leafleted in advance so that they are forewarned of the filming.
- Adequate stewards are present for public re-assurance and to preserve the security and safety of the film set.
- May require Traffic Management, road closure authorized by the local authority.
- Filming scenes of nudity in a public place may constitute an offence of outraging public decency.

Filming scenes with public safety concerns

The MPS Film Unit must be consulted in advance of any filming.

For the purposes of this guidance, a stunt, is where a competent person, such as a professional stunt performer, simulates an apparently dangerous activity in a careful and controlled manner during the production of a film or television programme. A stunt coordinator listed as a full member on the Joint Industry Grading Scheme (JIGS) register or equivalent may also be required to oversee the dramatic effect.

Stunts of this nature may include:

- Fire, heat, explosion or pyrotechnics
- Noise
- Moving vehicles or equipment
- Animals
- Weapons
- Projectiles and other flying debris
- Falls from height
- Violence

Explosions because of their very nature are of serious police concern. They can be both seen and heard and so often result in numerous emergency calls to the emergency services.

Please contact the MPS Film Unit as a police presence may be required.

Protocols:

- Suitable signage is used so that the public are aware of the nature of the filming.
- Local residents are leafleted in advance so that they are forewarned of the explosions.
- That adequate stewards are present for public re-assurance and to preserve the security and safety of the film set.
- FILMSFX CAD* will be set up to detail the event. This information will be passed to local Police teams and borough agencies.
- EXPLOSIONS: Police will require decibel readings and size of blast to gauge the Police response.
- Cordons will be required to safeguard public safety.

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- Production are to provide Risk Assessment forms, *Method Statements*, *Name of the company licensed to carry out the activity*, and *named individuals on set carrying out the explosion*. The company responsible may be asked to provide a copy of their Explosives or Firearms Certificate.
- A police presence may be advised even if on private premises (refer to Special Police Services on page 25).
- The MPS Film Unit have a commitment to public safety, and can organize unscheduled set visits from the MPS Firearms and Explosives Enquiry Team if it is deemed appropriate.

*Police generated reference number similar to FILMWEAPON CAD (page 6).

Filming on the move



The MPS Film Unit is the single point of contact for advising, managing and assisting the film industry when filming on the move on the roads covered by the 32 London Boroughs (City of London is not included). We are able to advise productions how to facilitate filming on the move, provide ‘no objections’ and deploy officers to assist where required.

Please see MPS Film Unit ‘Protocols to Filming on the Move’.

Drones

[Air Navigation Order 2021 link](#)

Protocols:

- Permissions to fly a drone, take off and land in a public place **MUST** be sought from the borough film office or Local Authority.
- Permissions to fly a drone, take off and land on private land **MUST** be sought from the land owners. Some private land will also be borough, council owned.
- Licensed drone operator will contact CAA, NATS to file a flight plan for approval.
- The MPS has a specialist unit who deal with drone applications within restricted London airspace. Drone operator will file a flight plan via the CAA/NATS and if within restricted airspace, the MPS will give approval or refuse flight. The MPS Film Unit do not give drone flight approvals or letters of no objections but can advise productions, drone operators on protocol.
- The MPS Film Unit will submit a DRONE CAD to pass to local Police and any specialist Police units for drone flights involved with commercial filming (Movies, TV, Documentaries, Commercials & Student Projects). **Land Surveys are not included, and drone pilots for this type of activity may inform local law enforcement either online or by dialing 101.**
- Drone operator **MUST** comply with the AIR NAVIGATION (AMENDMENT) ORDER 2021 relevant law and regulation.
- Cordons will be required to safeguard public safety.
- Some drone operators will have special dispensations to fly their equipment closer to structures.

HEALTH AND SAFETY

Please see below for the Health & Safety Executive 'Management of firearms and weapons in film and TV productions':

[Health & Safety Executive ETIS 20 link](#)

[Health and Safety at Work Act 1974 link](#)

A film set whether on location or within a studio complex is a place of work and the duty to ensure health and safety at site remains with the duty holder\production company. Health and Safety legislation is based upon The Health and Safety at work Act (HSWA).

General duties of employers to their employees.

2(1) it shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees.

General duties of employers and self-employed to persons other than their employees.

3(1) it shall be the duty of every employer to conduct his undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment who may be affected thereby are not thereby exposed to risks to their health or safety.

Reporting of injuries and dangerous incidents

This is a legal requirement via The Reporting of Injuries, Disease and Dangerous Occurrences Regulations (RIDDOR). Within these Regulations there is a duty to report that fit the specified criteria.

[RIDDOR Regulations 2013 link](#)

[RIDDOR HSE reporting guide link](#)

FILM LONDON - CODES OF PRACTICE

Please see below for the Location Filming in London Code of Practice from Film London:

[FILM LONDON Codes Of Practice link](#)

COVID-19

Productions on location are now requested to comply with the following guidance when filming

- ✓ [All UK Government guidance with regards to Working Safely During Coronavirus COVID 19](#)
- ✓ [The BFC COVID 19 Code of Practice June 2020](#)
- ✓ [The UK Broadcasters TV Production COVID 19 Guidance May 2020](#)
- ✓ [The APA COVID 19 Guidelines May 2020](#)

Governance & Consultation

The following organisations were consulted during the drafting of these protocols :

- **Metropolitan Police Service**
- **TfL (Transport for London)**
- **Film London**
- **A number of action vehicle companies**
- **A number of Borough Film Services**
- **A number of UK Location Managers**

For any further information, please contact the MPS Film Unit:

Constable Dan Elliott
Constable Eleanor Carmichael
Sergeant Sabrina Traynor

Metropolitan Police Service Film Unit

<https://www.met.police.uk/advice/advice-and-information/f/af/filming/>

Mail: filmunit@met.police.uk | Mobile 07780 338 569 (Dan Elliott)
Mobile 07770 177 655 (Eleanor Carmichael)

[National Police Chief's Council guidelines on Charging for Police Services](#)