

Management of firearms and weapons in film and TV productions

HSE information sheet

Entertainment Information Sheet No 20 (Revision 1)

Introduction

In this information sheet, **'must'** denotes a legal obligation. Words such as 'do', 'should' etc are used to give advice on good practice and are not compulsory.

This information sheet is one of a series produced in consultation with the Joint Advisory Committee for Entertainment (JACE). It is produced in consultation with the Metropolitan Police Film Unit. It gives guidance on the management of weapons that are part of a production.

This information sheet deals only with matters relating to health and safety. For advice relating to the Firearms Acts, the use of weapons and the Violent Crimes Reduction Act 2006 (VCRA) and the Crime and Security Act 2010, contact the Home Office.

Legislation

There are also legal requirements concerning the health, safety and welfare of those involved in the use of firearms and weapons in film, TV and theatre. These are the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 as amended, (the Management Regulations).

The Management Regulations require a suitable and sufficient assessment to be carried out by employers (or self-employed people) to;

- assess the risk to employees and others who may be affected by their activities, and
- determine the control measures necessary to avoid risk or reduce it to acceptable levels.

Definitions

For the purposes of this guidance, the following terms are used:

- **firearm(s)** includes live weapons, air weapons, blank firing weapons, imitation firearms, replica firearms and deactivated firearms;

- **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 the purpose of inflicting bodily harm but which may pose such a risk when used as a weapon.
- **weapons expert or competent person** is someone who has the necessary knowledge, experience and training to advise on the use of the weapon. These may include armourers, swordmasters, fight arrangers or martial arts experts;
- **an armourer** is a Registered Firearms Dealer (RFD), their agent or another properly authorised person.

Responsibilities

Responsibility for health and safety rests with the employer, which normally means the production company. In the case of TV, it could also be the broadcaster. In this information sheet, the term producer is used to represent the employer, organisation or person in overall control of the production activity.

It is the producer who has overall control of the production and who must make sure that there are arrangements to:

- coordinate safety;
- direct action sequences safely;
- exchange information with others including the person in control of the weapon and other contractors, premises managers, freelancers and the self-employed.

The producer should make sure that the person directing the action:

- is competent;
- has assessed the risks of the sequence to be filmed and agreed any controls needed with the stunt coordinator, the weapons expert, the actors and the crew (as appropriate);

- knows which filming methods to use to reduce the risk to people involved (using correct lens, angles and camera height);
- has scheduled time for rehearsals, safety briefings and reassessment of the hazards and risks if any changes are proposed.

The producer should make sure that the person in control of any weapon:

- is competent and holds the necessary licences;
- is provided with adequate information about the sequence to be recorded;
- has provided a written assessment of the risks and identified the controls needed; and
- has agreed to specify and/or supply the protective measures identified in the assessment.

The producer should also make sure that:

- the controls identified in the assessment are put in place and communicated to those who may be affected;
- there is cooperation and communication with the owners of the premises or location being used;
- there are adequate arrangements for emergencies.

The person in control of a firearm (the armourer or certificate holder) is responsible for:

- the safe use of the firearm - they should provide to the producer, an assessment of the risks and controls for the safe use of the weapons;
- making sure anyone using a firearm is not legally prohibited from doing so;
- the competence of the people who will handle the weapon, eg ensuring appropriate training is provided to actors;
- notifying the producer about the danger areas and safe distances required for the sequence so that no one is at risk from discharge, either accidental or intentional;
- clear communication about the sequence and the safe arrangement of people and equipment, ie providing the briefing to all who may be affected; and
- making sure that the protective measures identified are fit for purpose and used, eg screens, protective clothing and ear defenders.

Competence

The person in control of weapons in the production must be competent. The level of expertise required will depend on the weapon to be used and the circumstances. Advice may be sought from:

- an armourer;
- a swordmaster;

- a fight director;
- stunt coordinator, (see the Joint Industry Stunt Committee (JISC) register for details of required qualifications/experience);
- props wrangler or stage manager.

This list is not exhaustive.

Equity has compiled a list of fight directors commonly known as the Equity Theatre Fight Directors Register. The fight directors on the Equity Register have undertaken a programme of training and assessment. Currently, Equity recognises two organisations as being training and assessment providers - The British Academy of Dramatic Combat and the British Academy of Stage and Screen Combat.

Individuals should be assessed to ensure they have the competence needed for the particular weapon and its use in the production activity. It is important to remember that the supplier of the weapon may not necessarily be competent in the use of the weapon.

Armourers

An armourer should 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 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. The privileges of each licence will determine the limits on the firearm's storage, transportation and use. The holders are only allowed to operate within their privileges of licence, eg at a shooting club or as part of an organised event.

Performers

The experience, skills and competence of the performers using the weapons must be considered. The producer 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. All production personnel must follow the instructions.

Hazards

The following hazards are associated with the use of firearms and weapons within a production;

- flying objects, eg the projectile (arrow, bolt etc) and incidental flying objects such as spent cases ejected from automatic and semi-automatic firearms. Spent

- cases may be hot and can travel several metres;
- blast and impact injury caused by burning gases, unburned propellant, wadding and debris discharged from the barrel. All of these hazards apply equally to live and blank ammunition;
- unintentional discharge of weapons and contact injury or wounding with weapons such as swords and lances caused by, for example;
 - inexperience of users (artistes, extras etc);
 - fatigue;
 - use in difficult circumstances ie when negotiating thick ground cover or when subject to awkward and restrictive movement such as in a built up area.
- noise levels from discharging ammunition both blank and live is often in excess of 100 dB (A);
- burns, smoke;
- laser sights
- costumes that may restrict movement.
- sharp edges/splinters created during the intended destruction of wooden weapon handles during combat scenes.

Live ammunition

The use of live ammunition is to be used only under Home Office or Ministry of Defence regulations, under the privileges of the licence or approval and with permission from the police, eg on a firing range.

Blank ammunition

Blank ammunition is dangerous and can inflict serious injury as the wadding and debris can cover considerable distances. There is a lethal risk from the pieces of brass crimping or the wadding from an open-ended cartridge being projected/ejected. The armourer will advise on suitability of ammunition.

Precautionary measures

The following precautionary measures are some of the controls that can be put in place to manage the risks associated with the use of firearms/weapons on a production; the degree of controls required is relative to the level of risk associated with the use of firearms/weapons.

- Clear safety exclusion zones - suitable marking and rigorous policing of exclusion zones to ensure unauthorised persons cannot enter the danger areas. These areas should take account of intended lines of fire/throw and potentially hazardous areas created by resultant debris (cartridge cases, wadding etc);
- Ensure suitability of the ground surface/weather conditions.
- All weapons and ammunition must be accounted for at all times and kept secure.
- The security of firearms is the responsibility of the Armourer. They are to make sure:
 - firearms are transported only in accordance with the licence conditions;
 - firearms, except when in actual use, are secured appropriately;
 - ammunition and firearms travel in separate, locked containers. This includes blank ammunition and replicas;
 - firearms and ammunition are safe and secure at all times, including during rehearsal, performances, recording, filming or transmission.
- The producer should assess whether any employees are likely to be exposed to noise levels above the lower exposure action value as defined in the Control of Noise at Work Regulations 2005 and take such measures as are necessary to meet the requirements of those Regulations.
- Firearms are to be pointed at persons only when strictly necessary and the person in control of the weapon has confirmed that the necessary risk control measures are in place and that there has been adequate rehearsal.
- The weapon controller must be able to observe the use of the weapon and monitor the action to ensure that their instructions are followed;
- If a sequence for film or TV requires a camera to be in the line of fire or in an area where other projectiles such as arrows, spears etc may be flying, it should be locked off and operated by remote control. For sequences such as motion shots where an attendant camera operator etc is required, other arrangements may be needed to protect these persons and these arrangements must be detailed by the competent person.
- Where the risk assessment identifies the need for a protective clear screen for artists or others necessarily in a potentially dangerous area, the material must be fit for purpose. Eye protection alone will not normally be adequate.
- Information on the type and extent of the dangers created by the weapons in use should be provided to all those likely to be affected.
- Training in the use of the weapons is to be provided to those using them.
- All weapons should be blunt unless there is a specific action sequence requiring a cutting action. Points can be visually realistic while still being blunt. Wooden, plastic or rubber weapons can be hazardous if used in a stabbing or lunging mode and soft-tipped weapons will often be a safer and equally acceptable alternative.
- Replica swords should be manufactured in such a way that they are correctly balanced when in use. They should be of sound construction.
- In fight scenes, weapon blades should be of the same material, eg a steel sword should be used only against a steel sword, not one of aluminium.

- Weapons with retractable parts should operate smoothly and be lubricated appropriately.
- Costumes/garments should fit the individual performer correctly to ensure that the wearer can move around properly and that any weapon/firearm can be used safely. This should include headgear and any footwear. Items worn on the head should not restrict the performer's vision, including their peripheral vision.
- Artistes/performers who may be carrying out physically strenuous action should 'warm up' beforehand.
- Adequate time is allowed for rehearsal.
- Adequate rest time should be provided to reduce the risk of error due to fatigue.

Optical effects

Film and TV action may allow sequences to be broken down into segments to allow cutaways to build excitement and allow safer distances between weapons and people. Similarly, the choice of camera height, angles and the lens can also make a difference. For example, the foreshortening effect of a telephoto lens makes objects appear closer together than they actually are and can be used to exaggerate danger. Reverse motion is another invaluable tool.

Faults and misfires

If any weapon develops a fault, it must be immediately withdrawn from use. It should not be used again until a competent person has declared it safe.

Notification to the police

The general administration and enforcement of the Firearms Acts are entrusted to the police. The chief of police in any area is responsible for licensing the people living in that area.

If a firearm, replica or deactivated weapon is to be used in, heard or seen in or from a public place or where the public have right of passage, the producer must make sure that the police have been fully informed and that a point of contact for them is nominated, eg the 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.

Condition of weapons

The competent person must make sure that all weapons are inspected before use, at regular periods such as during breaks and after use. The visual inspection should look for defects such as loosening of components, rivets etc and damage such as hairline cracks, indentation in the blades etc.

Further reading

Management of health and safety at work. Management of Health and Safety at Work Regulations 1999. Approved Code of Practice and guidance L21 (Second edition) HSE Books 2000 ISBN 978 0 7176 2488 1 www.hse.gov.uk/pubns/books/l21.htm

Health and safety in audio-visual production: Your legal duties Leaflet INDG360 HSE Books 2002 (priced packs of 5 ISBN 978 0 7176 2551 2) www.hse.gov.uk/pubns/indg360.pdf

Firearms Law: Guidance to the police 2002 The Stationery Office 2002 ISBN 978 0 11 341273 0

Further information

For information about health and safety, or to report inconsistencies or inaccuracies in this guidance, visit www.hse.gov.uk/. You can view HSE guidance online and order priced publications from the website. HSE priced publications are also available from bookshops.

The Stationery Office publications are available from The Stationery Office, PO Box 29, Norwich NR3 1GN Tel: 0870 600 5522 Fax: 0870 600 5533 email: customer.services@tso.co.uk Website: www.tsoshop.co.uk/ (They are also available from bookshops.) Statutory Instruments can be viewed free of charge at www.legislation.gov.uk/.

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