



# Directing nudity and simulated sex:

**Creating a safe environment for daring work**

Guidance notes for screen directors

November 2019

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**Directors UK** is the professional association of UK screen directors. It is a membership organisation representing the creative, economic and contractual interests of over 7,000 members - the majority of working TV and film directors in the UK. Directors UK collects and distributes royalty payments and provides a range of services to members including campaigning, commercial negotiations, legal advice, events, training and career development. Directors UK works closely with fellow organisations around the world to represent directors' rights and concerns, promotes excellence in the craft of direction and champions change to the current landscape to create an equal opportunity industry for all.

## Introduction

*As the UK's professional association for directors working in the screen industries, we know from our members that they don't want anyone to feel unsafe, exploited or mismanaged in the casting suite or on set. They just want to tell compelling and impactful stories.*

*Directors UK is committed to creating a safer working environment. In 2018 we contributed to the development of the BFI/BAFTA Principles & Guidance to prevent bullying and harassment. In producing guidance on directing nudity and sex our aim is to support us to support to performers in an aspect of their work where they feel particularly vulnerable. You can read the principles and guidance [here](#).*

*And whilst we can't undo any negative nudity and simulated sex experiences some performers may have had in these environments, as directors we can set a professional tone and try to create a more positive and collaborative working environment.*

## The aim

Embracing a duty of care is vital in all aspects of directing, but even more so when directing nudity and simulated sex. This guidance addresses concerns around vulnerability and consent of those involved in creating this material. It will also support and develop the craft of screen directing by equipping directors with a practical way of working creatively with nudity and simulated sex scenes.

## A collaborative approach

As well as consulting with our members, we've approached colleagues across the sector for their best practice; performers, casting directors, agents, intimacy coordinators, sister unions and guilds and production companies. Our approach takes the input from these disciplines and sets clear and shared expectations about how this work should be handled.

## Why we need guidelines

- Working environments should be both safe and professional.
- Health and safety policies and risk assessments help, but evolving how directors engage with performers will too.
- Professionalism, courtesy and respect are not budget dependent.

- Performers are rightly beginning to challenge some historic on-set and casting behaviours around nudity and simulated sex.
- Guidance can positively rebalance the power dynamics between performer and director.
- Intimacy coordinators (ICs) are available, but how does a director work with them?
- Directors must be able to manage this process when budgets can't accommodate ICs.

This work isn't about censorship or preventing storytellers breaking new ground or pushing boundaries. It's about telling stories demanding nudity or simulated sex collaboratively and safely.

## **Creating a positive environment**

This guide is intended to:

- Provide directors with enhanced craft skills in directing nudity and simulated sex.
- Provide performers with a safe environment that values and respects dignity, especially when a narrative requires nudity or simulated sex acts.
- Give performers genuine agency in what actions their characters take.
- Support producers in their work to create a safe production environment.
- Give agents and casting directors confidence in the safety of the working environment.
- Show directors how to reassure performers that they should never feel expected to offer nudity/simulated sex to get work.

## **Risks to performers**

The fact is, that when a performer takes their clothes off or performs a simulated sex act on camera to convey the truth of a character's experience, they are inherently vulnerable and directors have a responsibility to manage this in a considered and respectful way as risks to performers can include:

- Intimidation to participate (bullying)
- Body shaming and ridicule
- Gender based derision and humiliation
- Reputational damage
- Objectification
- Stalking and obsessive behaviours from others
- Unwanted physical contact
- Molestation
- Physical assault
- Sexual assault

In this context we are providing clear and practical guidance to members on directing scenes of nudity and simulated sex, so directors and performers both feel safe to make daring work.

## Directors working with producers

Because the producer is usually the employer of the production, the director has little or no influence over the production's mandatory provisions or policy for health and safety. However, directors are bound by them.

Specifically, directors are responsible for ensuring health and safety within their own tasks (which can include managing nudity and sex scenes with performers) and being qualified to direct (with appropriate knowledge for the task). The producer will also require them to ensure all production health and safety policies and procedures are followed. We advocate that you are:

- Mindful of the risks to performers created by nudity and simulated sex scenes.
- Familiar with the detail of the health & safety policy of the production company; adhering to it and applying it to your work.
- Aware of the details of the risk assessments and control measures of the production and not creating risks for performers.

Be fully informed about the health and safety responsibilities you share. Meet them.

Work in accordance with the producer's health and safety policy and risk assessments.

Ask the producer what support is in place for cast/crew filming nudity and simulated sex.

## Work towards a consensus approach

Review the script together and discuss the necessity/tone for any nudity and simulated sex.

Discuss whether an intimacy coordinator is right for the production and if not, what support is the production able to give the director, performers and crew?

Commit to a continuous exchange of information around performer safety including narrative changes that might be needed.

## Develop your knowledge of what's OK

Use the Directors UK guidance on best practice.

Be aware of the clauses performers have in their contracts. Also talk to them to understand what aspects of scene physicality might hold issues for them. Plan shots accordingly.

In film: Become familiar with the content guidelines issued by the British Board of Film Classification. [bbfc.co.uk/sites/default/files/attachments/BBFC-Classification-Guidelines.pdf](http://bbfc.co.uk/sites/default/files/attachments/BBFC-Classification-Guidelines.pdf)

In TV: Become familiar with Ofcom's broadcast guidelines (particularly pages 12-15). [ofcom.org.uk/data/assets/pdf\\_file/0016/132073/Broadcast-Code-Full.pdf](http://ofcom.org.uk/data/assets/pdf_file/0016/132073/Broadcast-Code-Full.pdf)

## Directors working with writers

Review nude and simulated sexual content with the writer. Sometimes the complete visual detail of a scene is necessary to tell the story. Sometimes it isn't, and other actions can serve the story better.

Nudity and simulated sex should only be in the script if they're essential to story.

If the script isn't finished, the writer can tell you what they will expect it to contain and why.

As the originating author, the writer is well placed to support the director with truthful alternative actions.

Do events (like sexual violence) need to be shown in detail? Would suggestion be enough?

Don't underestimate the audience's level of screen literacy. They can piece together the on-screen clues, so we don't always have to put performers through traumatic acts to reveal a character.

### Preparing alternatives

Sometimes issues arise during filming that require a change of plan. Knowing the key purpose of the scene, the reason for the action and the intended result for the character generates creative blocking that can convey intense connections or conflicts.

Onset challenges you might encounter:

- A performer changes their mind
- A performer gets sick
- Performers decide they can't work together
- A location isn't safe
- Time is running out
- A last-minute re-write changes the nature of a scene
- Coverings and prosthetics got lost in transit

Common examples of alternatives to showing simulated sex:

- A slow single finger trailing across a piece of inoffensive skin
- Inhaling someone's scent
- Breath on a neck
- Straightening their collar or clothing
- Touching hair
- Pressing up against someone fully clothed
- Flinching, recoiling and pushing away
- The awkward (or not) greeting hug
- Two characters drinking from the same glass
- Dancing

- Preparing and serving food
- Undressing themselves or each other
- A whisper in an ear
- Use of other objects / animals as metaphor
- The closing bedroom door
- Use of audio over a black screen
- Juxtaposed image over intimate sounds

Never stop thinking about alternatives, they can save your schedule, preserve the nature of the story and might even be better than what was originally planned (don't forget to check with the producer!)

## Directors working with casting directors

By their nature, auditions are based on a power imbalance. Some performers can feel obliged to agree to uncomfortable requests to get the job. Casting directors are therefore rightly concerned about performer safety and issues of consent. To help ensure a professional environment and enable the director to believe that a performer's 'yes' is freely and confidently given:

### Auditions

If a role requires simulated sex or nudity, the casting brief should detail this, enabling the performer to make an informed decision about participating in the audition.

Auditions/casting should only take place in professional spaces, within working hours.

Acknowledge the practical challenges these scenes present and detail the support available.

Never assume a performer is OK with nudity/simulated sex, even if they've done it before.

Don't treat 'adult film' performers differently; everyone deserves consideration and respect.

When making an offer to high profile performers who've not auditioned, it's key to brief the agents fully. Performers need to know they will be working in a safe environment.

There's no need to use scenes of sex or violence to reveal character in first auditions. If this material is used, there should be no physical contact between performers and a stunt coordinator should supervise the handling of simulated violence.

If call backs use sex scenes, these should be done fully clothed and be collaboratively planned with performers beforehand.

### Undressing

No full nudity in any audition or call back. If a performer's body needs to be seen, request bikinis or trunks.

No semi-nudity in first auditions. If semi-nudity is needed in recalls, give the performer notice so they can bring a chaperone with them who can stay in the room during the session.

If a recall requires semi-nudity, give the agent and performer 48-hours' notice and supply the full script. If the project is secret, NDAs covering script content are acceptable.

If semi-nudity is to be filmed or photographed the production needs to obtain explicit consent for this from the performer in writing.

Any filmed or photographed material of semi-nudity will only be available to essential crew (director, producer, casting director).

Filmed or photographed material of semi-nudity must be stored in a GDPR-compliant way, must not be available for download and must be destroyed on the signing of the contract.

Never ask performers to put themselves on tape using semi-nudity or nudity and never ask for simulated sex acts. This should never be expected or desired.

## Directors working with agents

Agents are champions of health and safety policies and risk assessments to protect clients. Also, nude or simulated sex scenes need to be discussed with agents before contracts are signed.

Be prepared to brief agents with notes and storyboard references around intentions for framing and lighting; these will help agents understand the project and brief their client.

Discussions with agents need to be ongoing, particularly if the script is still in development.  
e.g. ask agents about performer boundaries: what body parts can be filmed and how.

Agents will also raise other issues you may not have considered and may need to - particularly if this is a performer that you absolutely must have to get the project financed. For example:

- Previous related trauma in a performer's life
- Risks of images being leaked to social media
- Impact of scenes on personal reputation
- Impact on international reputation in conservative territories

Open discussion with agents can provide insight to help you accommodate these issues.

## Directors working with wardrobe and make-up departments

### Seek help and ask questions

In advance of filming, ask heads of wardrobe and make-up how they can support these scenes. What covers, barriers and prosthetics do they have or can make.

When working with intimacy co-ordinators (ICs), put them in touch with the wardrobe and make-up team.

Share what you hope to achieve in the scene and identify what performer access they'll need. Plan their involvement sensitively.

Brief them on your plans for shots and lighting. As creatives, they will be able to advise on which items such as merkins and synthetic body parts, will be suitable and look good.

Bring the wardrobe department into rehearsals so that they can introduce the modesty patches, barriers and pouches etc that they will be using.

Before filming, confirm the support provisions and review performer requests (e.g. hiding a birth mark - get these in writing and signed by the performer if possible). Ensure the wardrobe team is briefed and performers know who's supporting them with robes.

Give the make-up and costume experts enough time to 'dress' the performers and ensure the Assistant Director will accommodate this.

## Directors working with performers

Stay focused on open communication, mutual respect and collaboration. Emotional props such as humour or unacceptable props such as drugs and alcohol undermine the integrity of the process.

### Rehearsal

Set aside specific time to plan and rehearse these scenes. If you have an IC, include them.

No nudity or semi-nudity in the rehearsal - only when the cameras roll.

Rehearsals need to be in professional spaces, in working hours.

Jot down your ideas to lay the groundwork for an open discussion with performers.

Discuss the scene as a group. What's important to the character? Where's the power?

Talk possible blocking through before anyone touches anyone. Invite the 'no' from performers (this identifies what actions and contact are OK). Get everyone's consent.

Listen to performer requirements that may not be in their contract riders.

Make it clear that if a performer is unhappy about the blocking, they can call stop.

Don't give 'secret' direction about the practical mechanics of the scene to individuals.

Leave embarrassment at home. Use proper biological terms for body parts - call a penis a penis - and together agree terms on what physical actions will be called. Don't joke around.

If there is simulated sexual violence in the scene, you must involve a stunt co-ordinator.

Together create 'Plan B' blocking, in case 'Plan A' needs to change on the day.

Performers shouldn't grab someone and 'demonstrate' what they're thinking. Similarly, a director should never act out what they want with a performer.

Plan movement, touch and kisses in advance. When kissing there should be no 'tongues', unless the performers and director agree. Agree on sucking, nibbling, duration, pressure etc.

## Filming

Brief the crew on what the scenes are about. Highlight what expected behaviour is and explain what support is available.

Ensure sets are closed (no mobile phones) and strip the crew back to essential personnel.

Give performers a word or phrase to let them indicate there's an issue during a scene.

Don't improvise the physicality on the day. Use the plans you've made with the performers.

If performing simulated sex acts performers must have barriers to ensure no genital contact.

Robes are mandatory for all naked or semi-naked performers. These stay on until the camera rolls and are put back on when 'cut' is called. Give direction when robes are on.

Check the performers are OK after each take.

Remind the crew in the morning about any closed sets so they can plan rigging, lighting etc.

Performers walking around nude between takes, is not OK. The crew need courtesy too.

Coordinate crew positions considerately to help performers and crew feel safe.

Brief the assistants to treat everyone who's nude the same; principles and day players alike.

Take your time. Don't rush. Make sure everyone is prepared and feeling safe.

Be mindful. If you sense a performer feels unsafe - check. Don't proceed until they feel safe.

If circumstances force a change get performers (and IC if you have one) together and talk it through. Double-down on character focus – what alternatives would still be truthful?

Afterwards when everyone is dressed, call them together and take a few minutes to debrief. Thank everyone. Check if they're OK. If there's an issue, notify your producer immediately.

Support a scene 'perpetrator' as well as the 'victim'. You may recoil from that character, but you need to be there for that performer. Signpost cast and crew to any aftercare available. Help performers disconnect from the character with something light and real. Ask them to share what their next job or favourite film is. Get them back to themselves.

## A note on working with teenagers and young people

Under the Directive 2011/93/EU of the [European Parliament and of the Council of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography](#), it is a criminal offence to make or distribute child pornography (a child is defined as someone under 18 years of age). Pornography is defined as:

- (i) any material that visually depicts a child engaged in real or simulated sexually explicit conduct;
- (ii) any depiction of the sexual organs of a child for primarily sexual purposes;
- (iii) any material that visually depicts any person appearing to be a child engaged in real or simulated sexually explicit conduct or any depiction of the sexual organs of any person appearing to be a child, for primarily sexual purposes; or
- (iv) realistic images of a child engaged in sexually explicit conduct or realistic images of the sexual organs of a child, for primarily sexual purposes; (Article 2)

Even if you're working on a project that involves some *non-explicit or implied sexual content* with teenagers or young people, there's significant regulation around their contribution.

In their [code for broadcasters](#) on TV content, Ofcom are explicit that due care around the welfare and dignity of participants in a TV show must be taken and that their involvement must not cause the participant any anxiety or distress. Consent to participate is not sufficient:

"The involvement of people under eighteen in programmes

1.28 Due care must be taken over the physical and emotional welfare and the dignity of people under eighteen who take part or are otherwise involved in programmes. This is irrespective of any consent given by the participant or by a parent, guardian or other person over the age of eighteen in loco parentis.

1.29 People under eighteen must not be caused unnecessary distress or anxiety by their involvement in programmes or by the broadcast of those programmes." (pg. 15)

Also, in terms of under 18s working as performers in either film, TV or theatre there are strict legal provisions around chaperoning, child protection, safeguarding and performance licencing that must to be met. These will need to be met over and above any health and safety statutory measures. Find out more here: [gov.uk/child-employment/performance-licences-for-children](http://gov.uk/child-employment/performance-licences-for-children)

**If in any doubt that the work is not compliant with the law don't hesitate to take legal advice.**

## Directors working with intimacy coordinators

Intimacy coordinators (ICs) are not hired to take over the direction of critical scenes in the project. They are a department head, akin to a stunt coordinator there to help deliver the directors vision. They advocate for safe practice for performers and crew. They:

- Undertake a risk assessment
- Facilitate open discussion around what might be achieved with the performer's OK
- Check with performers what actions and language might be 'triggering' for them
- Help to establish personal boundaries and freedoms between performers
- Work with the director and performers to choreograph specific character body movement that propels the storytelling
- Can suggest substitute actions and contact, utilising safe practice techniques
- Keep nudity and simulated sex performance 'on plan', and where changes are required, they ensure that these are negotiated
- Advocating for performers and crew also provides some protection to the production company and director in demonstrating that duty of care has been taken seriously

### Getting the most out of your collaboration with an IC

Review the IC's previous work and testimonials so that you understand their experience.

Share the script and your vision of it with the IC as early as possible.

Hold a planning meeting with the IC to discuss tone and objectives; share ideas.

Introduce them to the other Heads of Department so they can start collaborating.

As with any screen collaborator, develop and maintain a respectful relationship with them.

The IC should be present at rehearsals of intimate scenes to help plan blocking and contact.

The IC and director should work together with the performers.

On the day of filming, explain to the crew who the IC is so that everyone knows they are authorised to be there and can engage in any safe practices needed on the day.

On the day of filming, give the IC time and space to make their final 'safety' checks - just as a stunt coordinator would. Ensure your Assistant Director knows to accommodate them.

## Contributors and thanks

BBC Films  
Chris Carey (Carey Dodds Associates)  
Directors UK Board, Staff & Members  
Equity  
Ita O'Brien (Intimacy Coordinator, Intimacy on Set)

Kristina Erdely (Casting Director, CSA)  
The Casting Directors Guild  
The Writers Guild of Great Britain  
Vanessa Coffey (Intimacy Coordinator)  
Yarit Dor (Intimacy Coordinator, Intimacy Directors International)

We are grateful to our industry colleagues for their work in this area supporting their members, associates, clients and colleagues. Without it this collected guidance for directors would not exist.

We would also like to acknowledge the legacy of Equity New Zealand's work in this area in 2015 in protecting performers – which can be found [here](#).

## Need a little more help?

Email us at [communications@directors.uk.com](mailto:communications@directors.uk.com) call us at 0207 240 0009.

## Resources

BAFTA/BFI: Bullying and Harassment Prevention: Principles and Guidance and Dignity at Work Policy Template

[bfi.org.uk/about-bfi/policy-strategy/bullying-harassment-prevention](https://www.bfi.org.uk/about-bfi/policy-strategy/bullying-harassment-prevention)

BBFC Classification Guidelines

[bbfc.co.uk/sites/default/files/attachments/BBFC-Classification-Guidelines.pdf](https://www.bbfc.co.uk/sites/default/files/attachments/BBFC-Classification-Guidelines.pdf)

Equity New Zealand: Guidelines to performing nudity and simulated sex on stage and screen

[actorsequity.org.nz/equity-news/guidelines-to-performing-nudity-and-simulated-sex-on-stage-and-screen](https://actorsequity.org.nz/equity-news/guidelines-to-performing-nudity-and-simulated-sex-on-stage-and-screen)

European Commission: Directive 2011/93/EU of the European Parliament and of the Council of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography

[legislation.gov.uk/eudr/2011/93/contents#](https://legislation.gov.uk/eudr/2011/93/contents#)

Health and Safety in Audio-Visual Production: Your Legal Duties (HSE)

[hse.gov.uk/pubns/indg360.pdf](https://www.hse.gov.uk/pubns/indg360.pdf)

HSE Risk Assessment template

[hse.gov.uk/risk/assessment.htm](https://www.hse.gov.uk/risk/assessment.htm)

Ofcom broadcast code (pages 10-15)

[ofcom.org.uk/data/assets/pdf\\_file/0016/132073/Broadcast-Code-Full.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0016/132073/Broadcast-Code-Full.pdf)

UK Government: The Obscene Publications Act

[legislation.gov.uk/ukpga/Eliz2/7-8/66/section/1](https://www.legislation.gov.uk/ukpga/Eliz2/7-8/66/section/1)

UK Government: Child Employment – Performance Licences for Children

[gov.uk/child-employment/performance-licences-for-children](https://www.gov.uk/child-employment/performance-licences-for-children)

## Annex: Health and safety briefing for directors

### Legal obligations

Hiring organisations (offering paid or unpaid work), have a responsibility under the Health & Safety at Work Act 1974 and The Management of Health and Safety at Work Regulations 1999 to “...ensure, so far as is reasonably practicable, the health, safety and welfare at work”. This duty can be applied to situations where individuals are vulnerable to psychological damage, including stress and mental and physical ill health as well as potential physical harm.

In the Health & Safety Executives guidance *Health & Safety in Audio Visual Production: Your Duties* (which can be found [here](#)) it says:

“The underlying need is for the production company to establish appropriate organisational structures that support risk control and place health and safety alongside editorial and/or dramatic considerations. There should also be good planning, communication, co-operation and co-ordination by and between all parties involved throughout a production.” (pg1)

It then adds:

“Before placing a commission, the commissioner must be satisfied that a production company has the knowledge, skills and experience to do the work safely. They need to recognise that different competencies are required for different projects or programmes, for example there will be completely different competencies for studio-based talk shows, sports events and dramas with special effects.

The commissioner should ensure that the production plans and proposals have properly considered the safety implications. They should also ensure that factors such as health and safety management arrangements, realistic timescales, adequate allocation of resources and specialist safety expertise have been considered.” (pg2)

Essentially hirers are required to:

- Have a formal health and safety policy in place that identifies who is responsible for what and how various situations will be managed. (This should align with current health and safety policy.)
- Communicate to workers, freelancers and volunteers their rights and responsibilities around health and safety.
- Create risk assessments for all activities under the control of the production and ensure that appropriate controls and mitigations are in place for all identified risks.
- Monitor health and safety performance and implement effective remedial action for any shortcomings.

The guidance goes on to say:

“Everyone involved with the production is responsible for ensuring health and safety standards for their own activities.” (pg. 3)

Also, that the Producer can delegate to the Director and other members of the senior crew

“...responsibility for ensuring that:

- employer’s arrangements for health and safety are implemented;
- duties delegated to them are carried out;
- staff are adequately trained, competent and supervised as necessary;” (pg. 3)

For directors this means that as well as implicitly being responsible for ensuring health and safety within their own tasks (which can include managing nudity and sex with performers), and being qualified to direct (with appropriate knowledge for the task) the producer also requires them to ensure production policies and procedures are followed.

When risk assessments are developed (and directors themselves may have to build these if they’re functioning as a director/producer) risks such as performer nudity (possible assault, fire or emergency situations), risks to cast and crew mental health (use of trigger language or actions or even the leaking of restricted material on social media) and physical risks to a performers well-being (such as in the portrayal of sexual violence) should also be included. If you have an IC working with you, they will be able to help with the nudity and simulated sex risk assessment.

It may well be impossible to anticipate all of the risks in preproduction as locations, individual psychologies and even cultural concerns may not yet be known, but it is likely that the writer, director and producer will know if there is an *intention* to include nudity or simulated sex/violence in the work and what tone that content might have. This can help them develop risk assessments, policies and mitigations accordingly. Either way, a detailed and considered provision in the production’s formal health and safety policy should explain how such nudity and simulated sex scenarios will be managed e.g. with regard to preparation and briefing, support ‘during’ and what after care and support will be provided by the production.

A template for a risk assessment can be found here: [hse.gov.uk/risk/assessment.htm](https://www.hse.gov.uk/risk/assessment.htm)

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# Directing nudity and simulated sex:

## Creating a safe environment for daring work

Guidance notes for screen directors

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