

COVID-19 Transitioning – Obligatory Conditions and Guidelines for Indoor Cinemas and Theatres

The following obligatory conditions are issued under the Public Health Act Chapter 465 of the Laws of Malta and require strict adherence. Failure to adhere to these conditions will result in enforcement procedures as provided by the Act.

As COVID-19 restrictions are gradually relaxed, employers and workers must work together to adapt and promote safe work practices consistent with advice from public health authorities and to ensure that premises are ready for the social distancing and correct hygiene measures that are critical to the success of the transition.

Employers and workers must prevent the transmission of COVID-19 while at work, consistent with updated advice from the public health authorities.

Employers and workers must prepare for the possibility that there will be cases of COVID-19 in the workplace and be ready to respond immediately, appropriately, effectively and efficiently, and consistent with specific recommendations from public health authorities.

Mandatory conditions to be observed in indoor cinemas and theatres

All indoor cinemas and theatres shall

- a) exercise the right of refusal of entry onto the premises of patrons if they are visibly unwell or have respiratory symptoms
- b) subject patrons to temperature checks at the entrance for the presence of fever (persons with a temperature of 37.2° Celsius or higher will be denied entrance)
- c) provide adequate and easily accessible hand sanitisers with an appropriate 70% alcohol hand-rub at the entrance of the premises and ensure that all persons sanitise their hands prior to entrance
- d) regulate entrance into and exit from the premises adopting crowd management techniques as necessary
- e) ensure that the maximum number of patrons at any one time is one person per 4 square metres of each seating area being utilised, including staff
- f) indicate with visible markings outside and inside the premises two (2) metre distances that patrons shall respect whilst queuing, including queuing for rest rooms
- g) affix visible signage at the entrance of the premises indicating the maximum capacity that the premises can hold at any one time
- h) records of the contact information (name and a phone number) of at least one person per party need to be kept for up to 28 days after the show/performance
- i) except in the case of families with children and people from the same household, no more than 6 persons should be allowed to sit together in a group
- j) ensure that audiences are seated in such a way that each seated group maintains social distancing of at least 2m from other seated groups
- k) the distribution of 3-D glasses that are reused by multiple patrons is not allowed
- l) ensure that staff and patrons wear masks or visors while on the premises
- m) inform performers and crew utilising theatre facilities that they are required to follow the obligations detailed in this guidance even if they are not employed by the theatre operator, and ensure that they fulfil said obligations
- n) provide ongoing cleaning and disinfection operations of all the common areas inside the premises
- o) ensure that bar, restaurant or café facilities operate on the premises within the respective applicable guidelines.

Guidelines for the application of COVID-19 conditions and mitigation measures in indoor cinemas and theatres

Theatres and cinemas involve the provision of a service to the public but may also involve the sale and distribution of goods such as refreshments and programmes. Premises include both areas where workers interact with patrons and closed areas such as the 'back of house', backstage and/or projection room that may involve only minimal face-to-face contact with patrons.

Adapting cinemas and theatres to manage and mitigate the risk of exposure to COVID-19 requires a thorough risk assessment. These guidelines provide considerations that cinema and theatre organisers must take into account when deciding on control measures such as restrictions within their premises to allow for social distancing, the adequacy of facilities for proper personal and public hygiene, cleaning arrangements, and other changes that may affect the health and safety of workers and performers.

Determining the premises capacity for indoor cinemas and theatres

Operators shall ensure that on the premises there are 4 square metres of space per person, including staff.

To achieve this 4 square metre 'rule':

- i. calculate the area of the premises (e.g. length of premises in metres x width of premises in metres = area of premises in square metres)
- ii. divide the area of the premises by 4
- iii. the answer of that division (ignoring any remainder) is the maximum capacity that the premises can hold at any one time.

By way of example, if the premises are 205 square metres in size, $205 \div 4 = 51.25$, ignoring the remainder of 0.25, the operator should allow only 51 patrons at any time on the premises, including staff. For larger venues the value of the areas of separate sections of the premises should be summed up to calculate the total area. Only usable areas of the premises that can be accessed by patrons should be included when calculating premises capacity. Area pertaining to sections of the premises such as backstage and back of house should not be included.

Visible signage shall be affixed at the entrance of the premises indicating the maximum number of patrons that the premises can hold at any one time.

Enabling contact tracing

Cinema and theatre operators are required to collect the contact details (name and a phone number) of at least one person per party and keep a record of this information for 28 days after the show, explaining that these will only be divulged to an authorised officer in case contact tracing is required. This will enable contact tracing to be carried out should a positive case result among patrons or staff.

Social/physical distancing for audiences

Social distancing refers to the requirement that people physically distance themselves from others. Public Health Authorities have determined that everyone must keep at least 2 metres from others not from the same household. Visible signs and/or markings outside and inside the premises shall indicate 2 metre distances that customers shall respect whilst queueing, e.g. to enter the premises or use restroom facilities. The collaboration of Local Councils shall be sought, where applicable.

Organisers should also review tasks and processes that usually require close interaction and identify ways to modify these to increase social distancing between workers themselves and between workers and patrons (e.g. payment counters) as well as decrease the need for queuing. Measures that decrease points of contact between staff and patrons include digital tickets and online booking and purchase of tickets, which should be encouraged as much as possible. Online and/or cashless payments should also be encouraged, without disadvantaging

patrons who may not have access to such means of payment. When contactless payment is not possible, payment portals should be disinfected after each use. Self-scanning of tickets by customers can eliminate another point of contact between patrons and staff.

Crowd management techniques should also be used to ensure audiences maintain social distancing while taking and leaving their seats and to avoid groups gathering in common areas, for example before or after the performance. In the interest of reducing the duration of activities in a closed space and opportunities for face-to-face interactions between patrons and operators should consider omitting intermissions.

With respect to the seating areas, for seating that is not socially distanced (e.g. seating fixed in place or fixed to adjoining seats) operators should ensure that seating patterns allow 2m between groups of patrons who have attended the cinema/theatre together. Except in the case of families with children and people from the same household, no more than 6 persons should be allowed to sit together in a group. In the case of movable seating that can be spaced out as necessary, this should be laid out in such a way as to respect the 2m distancing requirement. These restrictions should be kept in mind when theatre/cinema seats are being booked. Operators may wish to employ techniques such as use of a checkerboard pattern or blocking off certain rows to help achieve the required distancing or employ software solutions that allow dynamic seat selection that respects distancing requirements at the booking stage.

When changing the social layout of the premises, the layout must allow for workers, performers and crew to enter, exit and move about the both under normal working conditions and in an emergency without risks to their health and safety.

Social/physical distancing for staff

Working in close contact increases the risk of workers being exposed to COVID-19. If the task must be completed and workers will be in close contact, undertake a risk assessment to determine what control measures are reasonably practicable in the circumstances to eliminate or minimise health and safety risks from COVID-19. For example, if close contact with others is unavoidable, implement other control measures that can apply such as:

- implement measures to decrease points of contact between staff and patrons and between members of staff
- minimising the number of people within an area at any time
- staggering start, finish and break times where appropriate
- moving work tasks to different areas of the premises or off-site if possible
- if necessary, separating workers into dedicated teams and have them work in shifts, with teams avoiding interacting with each other. Split or stagger shifts to reduce the number of workers on the premises at any given time
- if adopting a shift system, do not rotate workers between teams. Keep team members fixed so that if a team member develops COVID-19, the number of exposed workers is minimised.
- schedule time between shifts so that there is no overlap of staff arriving at and leaving the workplace to avoid / reduce interaction. If handover is required, consider using digital means for this so that staff do not need to physically congregate in the same place.
- using social barriers, such as clear acrylic or tempered glass screens (e.g. Perspex), at ticket booths and ticket scanning areas wherever possible
- requiring workers to use methods such as mobile phone to communicate rather than face to face interaction
- ensuring each worker has their own equipment or tools
- ensure staff do not attend work if they are experiencing potential symptoms of COVID-19

Hygiene facilities

Organisers must ensure there are adequate and accessible facilities to achieve good hygiene and that facilities are adequate, accessible, equipped with disposable hand wipes, soap and sanitizers, in good working order, clean and safe.

They should be thoroughly cleaned several times each day (see further details in section on 'Cleaning and Disinfection' below). Bathroom doors and windows should be kept open to allow for better ventilation. Hand dryers should not be used as these can potentially disperse viral particles into the air.

Air conditioning units shall be adjusted for more ventilation and recirculated air-conditioning shall be avoided. Airconditioning flaps should be directed towards the ceiling. Filters should be cleaned well and maintained properly. Doors and windows must be kept open and extractors are recommended which must be thoroughly cleaned every week.

Considerations for common areas

- Show times should be staggered as necessary to allow time for adequate disinfection between screenings/performances and ensure that large numbers of people do not occupy and congregate in the common areas at the same time.
- Time spent in the lobby should be further minimised by allowing earliest possible entry into the theatre (without compromising on cleaning and disinfection procedures) and encouraging patrons to arrive close to the start time of the film.
- Recreational entertainment using shared equipment (e.g. games room tables, arcade games, billiards, darts, children's rides etc) are not allowed. Similarly, interactive exhibits/displays or play areas are not permitted due to the high-touch surfaces involved.
- make available open receptacles for disposal of waste

Sale of refreshments

Bar, restaurant or café facilities operate on the premises within the respective applicable guidelines. Strict social distancing and hygiene precautions to be followed when selling refreshments:

- Markers two metres apart should be installed to facilitate social distancing while queuing to purchase refreshments.
- No communal food and beverage service or self-service items are allowed. Patrons are not to be allowed to serve themselves or help themselves to items such as straws, stirrers or condiments from a container that can be touched by the public, instead they should have such items handed to them by staff from behind the counter.
- If establishments wish to sell 'Pick and Mix' items, implements required to serve these should be handled solely by staff.
- Contactless payment or, if not possible, exact payment is preferable. The same member of staff who handles food and beverage items should ideally not be responsible for handling cash from customers, or, if such an arrangement is not feasible, should ensure that they sanitise their hands with soap and water or alcohol hand rub after each instance of handling cash.
- Any staff members handling food/beverage items should adhere to strict hygiene principles. These include frequent hand washing and use of gloves when handling such items, or, where possible, use of an implement (such as tongs) to eliminate direct contact with the items being sold to patrons. Any worker required to use gloves is advised to consult the advice on handwashing and the use of gloves published by the Health Promotion and Disease Prevention Directorate to ensure that gloves are used in an appropriate and hygienic manner (visit covid19health.gov.mt)
- Bins should be available for patrons to be able to safely dispose of any packaging waste.
- If vending machines are available on the premises, hand sanitiser should be easily available beside the vending machine, with signage affixed to the vending machine indicating that patrons should sanitise their hands before and after using the vending machine. Vending machines should be included in the list of high-touch surfaces prioritised for frequent cleaning (see section on 'Cleaning and Disinfection' below).

Considerations for performers and crew

Actors and crew are also required to practice social distancing and should avoid physical contact as much as possible. Minimum possible numbers of cast and crew should be allowed. Actors and crew are subject to the same requirements regarding hygiene and other COVID-19 related precautions as other staff, excepting that actors are not required to wear masks/visors during a performance. Should physical contact be required by a scene, actors should sanitise their hands before and after. Shooting intimate scenes should be avoided if possible. The cast member has the right to refuse close contact with other cast members, e.g. hugging and kissing. Individuals who qualify as vulnerable persons as defined by the Protection of Vulnerable Persons Order, 2020 should not be cast in performances. Records of performers and crew present at each performance and In-person rehearsal should be kept in order to facilitate contact tracing in case of possible SARS-CoV-2 contagion.

Actors and guests must dress themselves and set up their own microphones according to the wardrobe and technical crews' instructions, respectively. Wardrobe hygiene must also be considered when costumes are in storage. If outfits cannot be cleaned, they must be kept in storage for 72 hours before being reused. If performers will not be applying their own make-up and hair styling, the makeup designer and hairdresser doing so should have the necessary protective wear, and the actors, crew, presenters and guests should bring their own make up kits, brushes and hair styling products to reduce the risk of contamination. The processes should be kept as short as possible and less than 15 minutes. Make-up equipment should not be shared between cast members. Each performer should have a dedicated space for their personal belongings (pens, glasses, clothing etc), which should not be kept 'floating around' the backstage area. Digital copies of scripts and other documents should be used whenever possible. If physical copies must be used, actors and crew should have their own copy of the script and copies should not be shared between users.

Workstations and equipment used by more than one person need to be cleaned between users. Hand props should be disinfected between each user or handled by one actor only. Backstage and 'back of house' areas should be kept well-ventilated.

Staff and crew meetings, training and rehearsals

Postpone or cancel non-essential meetings or training. If meetings or training are essential, use non face-to-face options such as tele and video conferencing. If this is not possible, ensure face-to-face time is limited, make sure the gathering, meeting or training goes on for no longer than it needs to, and hold the gathering, meeting or training in spaces that enable workers to keep at least 2 metres apart – e.g. outdoors or in a large conference room. Limit the number of attendees in a gathering, meeting or training by holding multiple training sessions. Ensure adequate ventilation if gathering, meeting or training is held indoors.

Deliveries, contractors and visitors attending the premises

Additional persons beyond necessary staff, performers, crew and maximum allowed capacity of patrons should not be allowed on the premises. Minimise the number of workers attending to deliveries and contractors as much as possible. Delivery drivers and other contractors who need to provide maintenance or repair services or perform other essential activities, should be given clear instructions of requirements while they are on site. Ensure hand washing facilities, or if not possible, alcohol-based hand sanitizer, is readily available for workers after handling deliveries.

Personal protective equipment for staff

If employers have a situation where, despite other control measures, workers will be in close contact with each other or with other people for longer than the recommended time (i.e. more than 15 minutes face to face cumulative over one day or more than 2 hours in a shared closed space), consider the use of personal protective equipment (PPE). Workers must be trained in the proper use of PPE. Be aware of risks that may arise as a result of workers using and wearing PPE inappropriately.

The type of PPE to be provided will depend on the type of premises and the outcomes of risk assessment. Common PPE that can be used to protect against COVID-19 include masks, gloves, eye protection, and screens. The use of certain types of masks, gowns and disposable suits is restricted to healthcare settings. It is not recommended that these types of PPE are used outside of healthcare to protect against COVID-19. Eye protection, in the form of safety glasses, goggles or a face shield, can be used as PPE for protecting against the risks of COVID-19. Eye protection can assist to act as a physical barrier from droplet spray and prevent unintentional rubbing of eyes between hand washing. Eye protection may be necessary for workers who are in close proximity to droplet spray. For many indoor theatres and cinemas, eye protection will not be a required control measure. Good hygiene practices should be followed if eye protection is used.

In view of the fact that staff spend prolonged periods of time in indoor areas, including areas where maintaining social distancing is more difficult (e.g. the projection room, backstage or 'back of house' areas), and that staff may need to have close contact with each other to perform certain tasks, the advice of the Public Health Authorities is staff members should wear a mask or visor while at work.

It is the responsibility of the organisers to provide appropriate masks or visors to their workers. Organisers must also provide appropriate training and instruction on how to put on and fit, wear, remove and dispose of masks and on how to put on, remove and sanitise visors. They must also provide suitable facilities to dispose of masks appropriately. Information about using masks or visors is provided by the manufacturer. If a worker has been provided training and instruction about using a mask or visor, they must comply with that training and those instructions.

Since patrons will be spending a prolonged period in a closed space with others outside their household, they will also be obliged to wear masks or visors.

Gloves will not normally be necessary for most tasks in many theatre and cinema premises, apart from staff members selling food/beverages to patrons (see section on 'Sale of Refreshments' above) and for cleaning (see below). A risk assessment must be conducted to help inform what gloves, if any, are appropriate for the premises. If employers choose to supply or use gloves, they should make sure the gloves are suitable for the work; not all gloves are appropriate for all work or workplaces. Be aware that wearing gloves may result in new risks. For example, wearing disposable gloves could cause skin irritation, contact dermatitis or other sensitivities in some workers.

Cleaning and disinfecting measures

A combination of cleaning and disinfection will be most effective in removing the COVID-19 virus. There shall be ongoing cleaning and disinfection operations of all the common areas. Premises must be cleaned at least daily. Cleaning with detergent and water is sufficient. Once clean, surfaces can be disinfected. When and how often the premises should be disinfected will depend on the likelihood of contamination. Alternatively, cleaners may be able to do a 2-in-1 clean and disinfection by using a combined detergent and disinfectant.

How to clean and disinfect

Cleaning means to physically remove germs (bacteria and viruses), dirt and grime from surfaces using a detergent and water solution. A detergent is designed to break up oil and grease with the use of water. Anything labelled as a detergent will work. Cleaning should start with the cleanest surface first, progressively moving towards the dirtiest surface. When surfaces are cleaned, they should be left as dry as possible to reduce the risk of slips and falls, as well as spreading of viruses and bacteria through droplets.

Disinfecting means using chemicals to kill germs on surfaces. It is important to clean before disinfecting because dirt and grime can reduce the ability of disinfectants to kill germs. Disinfectants containing $\geq 70\%$ alcohol, ammonium compounds, chlorine bleach or oxygen bleach are suitable for use on hard surfaces (surfaces where liquids pool, and do not soak in). The packaging or manufacturer's instructions will outline the correct way to use disinfectant. Disinfectants require time to be effective at killing viruses. If no time is specified, the disinfectant should be left for ten minutes before removing.

Areas to be cleaned and disinfected

Any surfaces that are frequently touched should be prioritised for cleaning, e.g. door handles, seating, counters, phones, POS machines, vending machines, acrylic screens (if installed) and bathroom and other sanitary facilities, including bathroom fixtures like taps and flushing handles. Any surfaces that are visibly dirty, or have a spill, should be cleaned as soon as they are identified, regardless of when they were last cleaned. The premises should be cleaned and disinfected at least every day. If the premises have many patrons entering each day, more frequent disinfection of areas used by patrons is recommended.

Seating and other surfaces frequently touched by patrons during a performance/screening (such as railings in the seating area, doors leading to the seating area, if applicable) should be disinfected after each performance. Seating surfaces should be wipeable and easy to clean, if seats have cloth coverings application of wipeable covers is required. If certain areas of the premises e.g. 'back of house', backstage, projection and storage areas are only attended by the same small work crew each day having little interaction with other people, routine disinfection in addition to daily cleaning may not be needed in these areas.

Establishments should have protocols in place for actions to be taken in case a patron or member or staff develops coronavirus symptoms while on the premises, including appropriate cleaning and disinfection.

What should cleaners wear?

In most circumstances, it will not be necessary for cleaners to wear protective clothing to clean the premises. However, workers should use personal protective equipment (PPE) that is necessary for the products they are using. Gloves and a disposable apron are the minimum requirements. Medical masks should be used if cleaning an area impacted by a suspected or confirmed COVID-19 case. Clothes that can be washed afterwards are suitable.

How to stay informed: www.covid19health.gov.mt