



Central Council of Church Bell Ringers

"Registered Charity number 270036"

Tower Stewardship Committee

Guidance Note No. 4

TOWER SAFETY AND RISK ASSESSMENT

This guidance note gives guidance to ringers, parochial church councils and clergy regarding Tower Safety and Risk Assessment affecting the ringing of church bells.

As most of the ringing towers in the world come under the jurisdiction of the Church of England, it has been produced with this in mind. However, most of the principles addressed will apply to Churches of other denominations and also those outside the UK. It is recommended that, if needed, more specific local advice should be sought.

Introduction

This document is aimed primarily at active churches in England and Wales. There may be different legal requirements in Scotland and other countries. The position in redundant churches may be different and will depend on who is now responsible for the church and how it is used. The requirements in secular towers will also depend on who owns the tower and how it is used. Importantly, however, if you follow the guidance on risk assessment you are likely to meet the minimum requirements in any situation. If in doubt, seek specialist advice.

You may think that, because you are not working when you are in the tower, health and safety law does not apply. This is incorrect. The law covers any workplace and any person going into that workplace. A church is a workplace for clergy and others and is, therefore, covered. Ringers who enter the church are protected by the law and it is the responsibility of the person in control of the church to protect them. Whilst this means the church authorities (vicar and churchwardens, dean and chapter etc.) carry the legal responsibility, we can hardly expect them to have sufficient understanding of ringing to be able to bear that responsibility alone.

We, as ringers, should recognise that we are usually the best people to advise the church authorities on tower safety to enable them to meet their obligations.

Beyond the legal responsibilities, we should also recognise that we have both civil and moral responsibilities. We would be failing in our Christian duty if we did not adequately protect ourselves, each other and any visitors to the tower. We should also expect that, if we were to be negligent in caring for someone, resulting in injury, we could be liable under civil law.

Most of what we should do is no more than common sense.

There are specific regulations covering working at height and these are considered separately from general risk assessment.

What we need to do

In general terms, we need to ensure that the activities we carry out and the environment we carry them out in are as safe as is reasonable and practicable. We are expected to take care of ourselves and others. In order to assist in this, we are expected to carry out risk assessments. Risk assessments should be in writing if five or more people are likely to be exposed to the risks and the risks are significant. Even if there are not five people likely to be exposed, it is sensible and good practice to keep written assessments of any significant risks.

Risk Assessment

Assessing risk is not difficult; we all do it every day, for example when we cross the road. All we need to do is to ensure that we use a systematic approach to risk assessment which will enable us to explain and justify our actions.

A hazard is something which has the potential to cause harm.

Risk is the product of a hazard, the likelihood of an injury occurring, and the severity of the outcome.

There are, therefore, five stages to managing risk:

1. identify the hazards,
2. identify who may be harmed,
3. evaluate the risks,
4. record your significant findings,
5. regularly review your risk assessment.

1. Identify the hazards

Look around you, talk to others, ask visitors or others who visit the tower and try to picture what could happen.

2. Identify who may harmed

Is it all ringers, the steeple keeper, teachers, learners, visitors, unauthorised visitors, clergy, churchwardens, contractors? How would any injury occur?

3. Evaluate the risk

The best way to carry out risk assessments is to use a risk assessment tool. There are many such tools and you should choose one which works for you and your situation. The UK Health and Safety Executive produce a model risk assessment tool, as does the Ecclesiastical Insurance Company.

The Health and Safety Executive produces a leaflet called "Risk Assessment, A brief guide to controlling risks in the workplace" which is available on line. Individual hard copies are available free of charge (www.hse.gov.uk/risk).

Once you have carried out your risk assessment, you should send a copy of the completed risk assessment to the person responsible for Health and Safety within the church building. This may be a church warden, or someone specifically appointed by the Vicar or PCC. If in doubt as to who it is, talk to the Vicar or Churchwardens.

Having assessed a risk, you should then take measures to eliminate or minimise it.

This does not mean that you have to eliminate all risks; that is the approach which brings health and safety into disrepute and is to misrepresent what it is all about. What you are expected to do is manage the risks and reduce them to an acceptable level.

There is a hierarchy of risk management as follows:

1. eliminate the risk, or
2. reduce the likelihood of the event, or
3. protect against the event.

Once you have assessed the risk and decided what can reasonably be done to reduce it to an acceptable level, you should then do what is necessary and ensure that everyone else does so too.

4. Record your significant findings.

You should keep a written copy of the risk assessment, including actions to manage the risk. Written copies are useful references for you in future when questions arise. Copies should be kept in the tower and drawn to the attention of other ringers and people who join the band or visit regularly

5. Regularly review your risk assessment.

You should review your risk assessments at least annually to ensure that they are still valid – the reviews should be well documented and recorded. You should also review them if you have any significant changes such as starting to teach learners when you have not done so previously or if you augment or re-hang your bells. If you are unfortunate enough to have an accident, you should, of course, re-assess the risk. You may still decide that the risk is so low that no further precautions are needed. You should ensure that any “accident book” complies with Data Protection legislation by having removable pages for separate filing elsewhere.

The Risk Assessment Tool

There are several methods of performing Risk Assessments. Two examples are available on the Tower Stewardship website (see below). These risk assessment tools are as recommended by the Ecclesiastical Insurance Company (EIG) and the Health and Safety Executive, and can be found on their respective web sites. It should be noted that these not specifically recommended by the Council. Included within the reference section are links to tower and association web sites that have used these tools.

Working at Height

The Work at Height Regulations 2005 came into effect on 6 April 2005. The regulations apply to all work at height where there is a risk of a fall liable to cause personal injury.

A place is 'at height' if a person could be injured falling from it but excludes staircases (but belfry stairs should be covered by a general risk assessment). This will, therefore, include working on bellframes, some belfry access routes such as ladders and walkways, and could include some ringing rooms/balconies.

They place duties on employers, the self-employed, and any person that controls the work of others (for example facilities managers or building owners who may contract others to work at height).

As part of the Regulations, duty holders must ensure:

- all work at height is properly planned and organised;
- those involved in work at height are competent;
- the risks from work at height are assessed and appropriate work equipment is selected and used;
- the risks from fragile surfaces are properly controlled; and
- equipment for work at height is properly inspected and maintained.

There is a simple hierarchy for managing and selecting equipment for work at height. Duty holders must:

- avoid work at height where they can;
- use work equipment or other measures to prevent falls where they cannot avoid working at height; and
- where they cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

The Regulations include schedules giving requirements for existing places of work and means of access for work at height, collective fall prevention (e.g. guardrails and working platforms), collective fall arrest (e.g. nets, airbags etc), personal fall protection (e.g. work restraints, fall arrest and rope access) and ladders.

Only persons with appropriate training may work at high levels. (e.g. approved contractors, employees, competent volunteers.) A method statement and risk assessment should be carried out and both approved.

Guidance is provided in the HSE's booklet on the Regulations, see the "Further Information" section below.

General Principles for Health and Safety in the Bell Tower

The following general principles should be used when considering risk assessment in the bell tower. This is not an exhaustive list, further items may be added following a risk assessment.

A. Initial Procedures

A1. The bellringer appointed to be in charge of activities related to bellringing in the tower (normally the tower captain or ringing master) should, on appointment, review each activity (eg, bell handling for learners, bellringing, use of boxes, length of bell ropes, putting on muffles, bell maintenance) from a Health and Safety point of view (ie, make Risk Assessments), or should review risk assessments already in place.

A2. Any new activity should be similarly assessed.

A3. A written record should be made of precautions (including any training) to be taken to minimise risks associated with bellringing activities and the bellringer-in-charge, on appointment, should confirm that these precautions will be followed.

B. General Precautions

B1. There should always be an indication at ground level (eg, at the entrance to the tower stairs) and in the ringing room to show when any persons are in the tower at higher levels. Consider installing an illuminated indicator (ie a red light) to indicate this.

B2. The entrance to the ringing room, bellchamber, and any intermediate chambers should normally be kept locked against unauthorised entry.

B3. Smoking should not be permitted within the tower nor on roofs, stairs, or walkways leading to or from the tower.

B4. Adequate lighting should be available for any tasks performed in the tower, including provision for emergency lighting in the case of mains failure. Any alteration or addition to the electrical installation, with appropriate authority, should be carried out as recommended in the Churchcare guidance notes and only by a qualified electrician, and with permission of the church authorities.

B5. Electrical equipment should be used in the tower only if it is in good order and can be operated safely.

B6. Heating in a tower should not be by equipment using naked flames. Hot element radiant heating (eg, infra-red or quartz-ray) should be used only if the equipment is permanently fixed in agreed safe places. Portable heaters (eg, convectors) shall be used only if kept at safe distances from flammable materials and should not be left switched on when the tower is unattended.

B7. Non-ringers in a tower must always be accompanied by a competent ringer during ringing and when bells are left mouth upwards (see also C2).

B8. There should be a Fire Plan for the church, including the tower, and the person-in-charge of the ringers must ensure that all persons in the tower in connection with bellringing activities are aware of it. Fire extinguishers in the tower should be in agreed fixed locations and be checked annually.

B9. Visiting ringers: the person in charge of ringers must be satisfied that all visiting ringers are of adequate competence to be able to ring safely.

B10. Exposed ground floor rings should have a mechanism to ensure the ropes are pulled up out of normal reach, even when the bells are down. The control for letting down the ropes should be locked.

C. In the Bellchamber

C1. Bells should always be kept mouth downwards when the tower is vacated unless they can be safely left inverted, or 'up'. Bells may only be safely left up if:

- all bells and ropes are inaccessible and access to them is kept locked, keyholders being ringers or persons trained in awareness of the hazards of bellringing. This includes intermediate chambers between the ringing room and the bellchamber.
- warning notices are displayed at each point of access to the bells and bellropes.
- the locked spaces are not 'through routes' to other parts of the church.

C2. Entry to the bells and bellframe should not be permitted when the bells are ringing or are set mouth upwards unless there are safe means of locking the bells in the up position, or if it is necessary and safe to observe a bell in motion. Two people should be present in such circumstances of whom at least one should be a competent ringer. If the bell is in motion without its clapper being tied, ear defenders should be freely available and worn.

C3. Safe access should be available to every part of the bell equipment that needs to be maintained, including for the application of muffles.

C4. Whenever any maintenance or other activity has taken place in the bellchamber, or intermediate chambers, this should be recorded in a log book. Before any subsequent bellringing takes place, the bellringer-in-charge of ringers should ensure that conditions are safe for bellringing and that there are no obstructions that would endanger persons, bells, or the fabric of the tower.

C5. The resident ringing master (or other person responsible for tower safety) must take reasonable steps to ensure that they are satisfied that all ringers (including visiting ringers) are competent, in good health and are of suitable height and build. Competent means that ringers have sufficient experience, in the opinion of the ringing master, or are in the process of being trained in bell ringing. The ringing master must warn visiting ringers of the particular circumstances attached to the tower.

TOWER SAFETY GUIDELINE SUMMARY

Identify the hazards and assess the risks

- Ensure that ropes are not accessible to unauthorised people
- Ensure that the bell chamber is not accessible to unauthorised people
- Display clear warning signs and fire exit notices on appropriate doors
- Ensure that anyone entering the ringing room can tell immediately if there is someone in the bell chamber
- Ensure that someone knows if you are working on the bells or, even better, have someone with you
- Never work on bells which are up, including fitting or removing muffles
- Ensure that non-ringers are always accompanied and supervised
- Only allow appointed, experienced ringers to be responsible for teaching
- Only allow inexperienced ringers to ring if they are adequately supervised
- Check bells are down before making coils

Further Information

Further advice and information are available from your local authority (usually the Environmental Health Department) as the enforcing authority. The authority's website will usually include some advice and information and the Environmental Health Officers will usually be happy to assist you.

The Health and Safety Executive (HSE) publishes the following leaflets (referred to above), which are available on their website.

- Risk Assessment, A brief guide to controlling risks in the workplace – indg 163 (Revision 4 revised 08/14)
- The Work at Height - A brief guide – indg 401 (Revision 2 revised 01/14)
- Safe use of ladders and stepladders – A brief guide. - indg 455 (Published 01/14)

They are available free of charge for individual copies from HSE Books on 01787 881165 or www.hsebooks.co.uk.

The HSE also has a free advice service on 0845 609 6006 and a website at www.hse.gov.uk

Useful information can also be found on the website of the Ecclesiastical Insurance Company and Churchcare (Cathedral and Church Buildings Division, Archbishops Council)

www.ecclesiastical.com/fororganisations/riskmanagement/index.aspx

www.churchcare.co.uk/churches/guidance-advice/all-guidance-notes

Bell ringing specific risk assessments can be found on various websites.

Two examples are produced by the Kent County Association of Change Ringers and the St Mary's Church, Oringbury can be found on the Tower stewardship page <http://cccbr.org.uk/towerstewardship>

For further information, contact the Chairman of the CCCBR Tower Stewardship Committee:

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Other **Guidance Notes** produced by the Tower Stewardship Committee are:-

GN1 - Insurance

GN2 - Tower Management

GN3 - Child Protection In Towers

GN4 - Tower Safety and Risk Assessment

GN5 - Church Law

GN6 - Fire Assessment and Protection

GN7 – Noise, the Law, and the Environmental Health Officer

These Guidance Notes can be downloaded free of charge from the Tower Stewardship Committee section of the Central Council of Church Bell Ringers website:

www.cccb.org.uk/towerstewardship

