



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 at risk and how,
3. assess the risks,
4. manage the risks,
5. record, monitor and review.

### **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 be at risk and how**

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

### **3. Assess 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.

Alternatively you can use the tool included in this Guidance Note.

The Health and Safety Executive produces a leaflet called "Five Steps to Risk Assessment" which is available on line. Individual hard copies are available free of charge or you may obtain larger numbers for a small charge ([www.hse.gov.uk/risk](http://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.

#### **4. Manage the risks**

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.

#### **5. Record, monitor and review.**

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.

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.

### **Typical Hazards**

What hazards exist in any particular tower will be specific to that tower, however, common hazards you might wish to consider in your tower could include, routine maintenance of bells and fittings; access to the ringing room and bell chamber, unauthorised access to the ringing room and/or bell chamber, teaching learners, changing light bulbs, lighting and ventilation, noise, turning clappers on bells which go up wrong, electrical hazards, fires, falls etc.

## **The Risk Assessment Tool**

There are several methods of performing Risk Assessments. Two examples are shown 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.

## **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.

- Five Steps To Risk Assessment – indg 163 (Revision 3 revised 06/11)
- The Work at Height Regulations 2005 - 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](http://www.hsebooks.co.uk).

The HSE also has a free advice service on 0845 609 6006 and a website at [www.hse.gov.uk](http://www.hse.gov.uk)

Useful information can also be found on the website of the Ecclesiastical Insurance Company:

[www.ecclesiastical.com/fororganisations/riskmanagement/index.aspx](http://www.ecclesiastical.com/fororganisations/riskmanagement/index.aspx)

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 Harry Windsor Ringing Centre:

[http://kcacr.org.uk/forms/risk\\_assessment.pdf](http://kcacr.org.uk/forms/risk_assessment.pdf)

<http://harry-windsor-ringing-centre.co.uk/st-peters-kineton/kineton-risk-assessment/>

## Example Risk Assessment

### St. X Church,

Risk Details					
Under additional controls you should note the additional measures that are needed to reduce the risk to an acceptable level and record when they have been implemented.					
Hazards/risks/ persons affected	Existing controls	Likelihood (L)	Severity (S)	Risk Rating (L x S)	Additional Controls
Falling from Ladder to Clock Chamber		2	2	4	Access only by or in presence of NG/GN or with permission of NG, who will give instruction and supervise. Lock on trapdoor to be changed to ensure three points of contact
Padlock Falling from Trapdoor		2	2	4	Change to fixed lock
Falling through Trapdoor		1	3	3	Fix part guardrail around top of trapdoor.
Contractors/Visitors leaving bells in potentially dangerous state		1	2	2	NG to agree access by all contractors/visitors NG/GN to check after all visitors/contactors have been above ringing chamber level.
Hole in belfry Floor where old Clockcase was.		1	2	2	Verbal warning to all belfry visitors – restore floorboards permanently
Fire		1	3	3	Key of Balcony to be in door when tower in use. Extinguisher for Electric to be in ringing chamber. Move electric boxes from access.



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](http://www.cccb.org.uk/towerstewardship)**