

Emerging from Lockdown: Guidance for Churches

Introduction

This version 9 replaces previous versions and should be regarded as taking immediate effect.

Since publication of the last version of the Scottish Episcopal Church guidance, Scotland has moved to "beyond level 0" in the Scottish Government's Strategic Framework. As a result, many, but not all, of the detailed restrictions to which we had become accustomed have ceased to apply.

The Government's own guidance for Places of Worship has been updated to reflect the current situation and is much reduced in length from earlier versions. In the light of this, the Advisory Group has decided that, for the future, rather than producing its own detailed guidance, it encourages congregations to direct themselves to the Government guidance which can be accessed at:

<https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-for-the-safe-use-of-places-of-worship/>

That guidance also provides links to a number of other sets of guidance on specific topics which may be helpful for congregations. Those responsible for a place of worship are legally required to "have regard" to that Government guidance.

This Advisory Group note does not so much provide new guidance or direction for congregations but rather amplifies and applies the Government guidance. It should also be read alongside accompanying Pastoral Advice issued by the College of Bishops. It covers a range of matters of a pastoral and liturgical nature and is available at: <https://www.scotland.anglican.org/coronavirus-updates/>

This note is also supplemented by FAQs which have been updated as matters have developed throughout the pandemic. They are similarly available at: <https://www.scotland.anglican.org/coronavirus-updates/>

Being "beyond level 0" is a more difficult landscape to navigate than the previous periods when there was a more comprehensive framework of applicable restrictions. Despite the new, less-regulated, environment in which churches now find themselves, the Advisory Group urges caution and encourages churches to "go gently" in this period of greater freedom. Those attending church should be advised to act responsibly not only for their own benefit but also for the care of others. Those who wish to take maximum advantage of the relaxation of restrictions should bear in mind that such an approach may be a source of anxiety for others. This remains a time when everyone should be mindful of one another – in so doing we "love our neighbour".

Guidance was produced previously during lockdown at a point when churches were permitted only to open for individual prayer and not public worship. If a church is currently only opening for private prayer and not public worship then that previous

guidance remains relevant, except that the wearing of face coverings is now mandatory in a place of worship, whether that place of worship is offering public worship or just individual prayer.

The intention of these and any other guidelines produced internally within the Church is to support and enable clergy and congregations to operate within the terms of published Government and Public Health guidance. To the extent that such official guidance becomes more prescriptive at any point over time, it should be regarded as taking precedence over any internal church guidance if there is any conflict. It is also our intention, as noted above, to update these guidelines, or issue email updates, as swiftly as possible to bring them into line with any changes in Government and Public Health guidance.

General points of note

1. Face coverings continue to be a legal requirement in churches. Regulations state that face coverings do not need to be worn by those leading an act of worship provided there is either a partition between that person and other people, or a distance of at least 1m is maintained between that person and others. Similarly, those who are "performing" need not wear a face mask (provided there is a partition between each performer and others, or a distance of at least 1m is maintained between the performer and others). Church choirs and worship bands can, therefore, sing without face coverings, provided their members maintain at least 1m distance from each other and everyone else. Congregational members are not "performers" and so must continue to wear face coverings whether singing or not.
2. Certain categories of individual are legally excused from wearing face coverings, including children under 12. Also, there is a defence of "reasonable excuse" for not wearing a face covering which is available for those who cannot, without severe distress, put on, wear or remove a face covering because of a physical or mental illness or impairment or disability and also where it is necessary to seek medical assistance, or to provide care or assistance to a vulnerable person. Those who are excused from the requirement to wear a face covering are now able to apply for an exemption card (physical or digital) which may be of assistance if they find themselves in a position of being challenged as to why they are not wearing a covering: <http://exempt.scot/>
3. Despite the relaxation of restrictions, churches should continue to mitigate risks by maintaining good hygiene, practising respiratory hygiene, ensuring good ventilation and continuing to engage with Test and Protect. Churches will wish to assess the level of risk in their own particular context, and we recognise that some will wish to continue with at least some of the previous restrictions, such as physical distancing. That is likely to include an assessment of pastoral issues – and the likely perception of the level of risk on the part of the congregation. So, if it is thought that members of the congregation perceive that the level of risk is such that they feel uncomfortable, it would be appropriate to consider maintaining restrictions for a longer period.

4. The Advisory Group would encourage all members of the Church to make use of the Protect Scotland app available as part of NHS Scotland's test and protect scheme: <https://www.protect.scot/> The Government also advises everyone to take lateral flow tests twice weekly: <https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19/test-and-protect/coronavirus-covid-19-get-a-test-if-you-do-not-have-symptoms>
5. Churches are no longer required to display at their entrances their Physical Distance Based Capacity, nor are services subject to specific caps on capacity. Whilst physical distancing requirements are no longer a legal obligation (other than the limited ones referred to above), churches may wish to continue to maintain some form of physical distancing during church services. Some churches will choose to do so for the congregation as a whole, others may offer a mixed economy with some seating areas designated for physical distancing and others not. Depending on the approach adopted, the total number of people capable of being accommodated in the service may be less than the size of the regular congregation prior to the pandemic. As a result, alternative strategies such as prior booking for services or online streaming of services may need to be continued.
6. Risk Assessment: A decision whether or not to resume public worship should be considered initially by the vestry, as the charity trustees for the charge. No resumption of activity can be entirely risk-free and any consideration of restarting activity will involve the vestry undertaking a Covid-19 risk mitigation assessment to consider and address the operational implications of such restarting. Subsequent alterations to practice, after activities have resumed, should similarly be subject to appropriate risk assessment. A variety of risk assessment templates have been produced by other churches and in case they are helpful to vestries, one such assessment can be accessed at:-

https://www.churchofscotland.org.uk/_data/assets/word_doc/0009/73557/COVID-19-Coronavirus-Risk-Assessment-V2.docx

General advice on risk management (not specifically related to Covid-19) is also available at:

<https://www.scotland.anglican.org/vestry-resources/vestry-responsibilities/risk-management/>

A. Preliminary matters to be addressed prior to any resumption of public worship

1. At the time of issue of this version of this Guidance, many churches have already reopened and resumed public worship. For any churches which have not reopened their building, various preliminary issues which require to be considered are set out in Appendix 1. Other actions needed on an ongoing basis after reopening are set out in the remainder of this section.

2. Consider resilience planning and develop appropriate contingency measures to address situations such as key personnel catching the virus or having to self-isolate or shield. In the event of an outbreak of Covid-19 in the congregation, anyone affected should follow the 'Test and Protect' protocol immediately (<https://www.gov.scot/publications/coronavirus-covid-19-test-and-protect/>) and the Rector/vestry should seek guidance from the local public health authority.
3. Any churches which have not so far resumed in person activity and who now wish to do so should, having undertaken a risk assessment, first approach the Diocesan Bishop for consent. A pro forma Plan has been developed for use by vestries in seeking such consent and is available at: <https://www.scotland.anglican.org/wp-content/uploads/Plan-for-Reopening-for-Communal-Worship-Phase-3-Version-2-14.7.20.docx>
4. The role of the Bishop is to respond to an approach by a vestry and in considering whether to give consent is one of oversight and care in relation to both clergy and congregation. No Bishop will encourage the reopening of a church unless the vestry and cleric wish to do so and any reopening will be the outcome of a dialogue between cleric/vestry and Bishop.
5. Any steps taken by churches are likely to involve, to a greater or lesser extent, volunteers or church staff. In considering how the church emerges from lockdown, it will be important for vestries to be conscious of their duty of care to volunteers and staff and, likewise, for bishops in relation to clergy and other authorised ministers.
6. Any Person who is self-isolating or shielding or is in a vulnerable category (see: <https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19/coronavirus-covid-19-general-advice>) should not be invited to undertake functions which would be contrary to public health advice on how they should protect themselves. Such matters are part of the church's safeguarding duties to the vulnerable. Similarly, no such person should be put in a position of feeling under pressure to undertake such functions. Also, any person who becomes unwell with symptoms of Covid-19 should immediately return home and follow public health advice. In an emergency a 999 call should be made if they are seriously ill or their life is at risk.

In relation to volunteers and staff who are able to undertake functions, it will be important that each individual is given a clear explanation of what is required of them, has been given training and resources appropriate to the task in question and knows to whom to refer any problems. Where a health and safety risk exists, the risk assessment referred to above should address these issues. Churches with employees should follow any Government or Public Health guidance applicable to employees and, whilst volunteers and clergy are not employees, it is suggested that they should be afforded the same level of protection as paid staff. Also, when planning any activities which are permitted, consideration should be given to appropriate contingency planning to address the situation where an individual (clergy, staff or volunteer) ceases to be available to undertake a task or function if they are required at short notice to self-isolate under the Government's test and protect policy.

7. Different congregations will move at different speeds as they emerge from lockdown and just because one congregation is in a position to undertake some resumption of activity in their church building does not mean that others should feel any pressure to do likewise. It is also the case that, in the light of appropriate risk mitigation assessment, activities which it may be possible to resume in one location cannot be resumed in another (for example, because of constraints imposed by the building).
8. It is expected that for the foreseeable future provincially-provided online worship will continue to be available. It has been a means of making church accessible to many, some of whom were unable to attend church in person, even before the pandemic.
9. Any gathering carries risk, and everyone should consider their own vulnerabilities and those for whom they are responsible and think through the risks they deem acceptable to themselves and others. It is expected that individual church members will act responsibly and in accordance with Government regulation and public guidance applicable to the population as a whole on matters such as self-isolating, wearing of face coverings, regular testing etc. Parents or guardians should ensure that children similarly behave responsibly. No-one should feel pressure to return to church until they feel comfortable to do so.

B. Matters arising in relation to worship services

Worship in the Scottish Episcopal Church covers a wide range of different styles and practice. The guidance below is broad in scope but it is recognised that some aspects will not be relevant in every congregation (for example, not all congregations will have a tradition of processions at the beginning or end of services). It should be read in conjunction with the Pastoral Advice from the College of Bishops available at:- <https://www.scotland.anglican.org/coronavirus-updates/>

1. Liturgical and related matters concerning services are dealt with in detail in the Pastoral Advice from the College of Bishops. That includes a Protocol in relation to eucharistic worship and comments on matters such as the Peace, use of incense and the administration of Holy Communion. It will be important that clear instructions are given to the congregation on how such a protocol is to be observed (for example, in relation to the Peace or queuing for Communion).
2. Where it is possible within the constraints of the building, it is recommended that a “one-way” system be introduced and made clear by appropriate floor markings or other signage so that physical distance between people can be maintained. A safe “queue management” system should be put in place to ensure that the flow of people both in and out of the building can be carefully controlled (including queuing outside the building on arrival), having regard to the capacity of the building and to reduce the risk of congestion or contact.

3. In order to minimise physical contact, consideration should be given to hygiene and the use of handrails and door handles on entry. Leaving a door open would minimise physical contact.
4. Welcomers/sidespeople should help to inform and reassure the congregation as they arrive (or queue) regarding the way to safely enter and be seated in the building. Our welcome should be demonstrated by appropriate gestures and not handshakes or hugs. Welcomers, like other members of the congregation, must wear face coverings.
5. Public health signage should be prominently displayed to emphasise the need for ensuring appropriate hygiene on the part of those attending. Sample materials can be viewed at the following (some materials are for purchase):-
<https://www.cpo.org.uk/catalogue.aspx?cat=630>
6. Hand sanitiser, with an alcohol content in excess of 60% in the case of an ethanol-based product, or in excess of 70% in the case of one using isopropyl alcohol (isopropanol), should be available at or near the church entrance and those attending should be asked to use it on arrival and departure. Adequate supplies of tissues should be available and bins, ideally pedal operated bins, should be provided for their disposal.
7. Scottish Government guidance recommends that, for the sole purpose of enabling contact tracing in the event of a Covid-19 outbreak, places of worship continue to maintain limited records of those working there or attending public worship. More detailed information regarding this is set out in Appendix 2. There is no longer any recommended ban on the reuse of liturgy books, hymn books, Bibles and similar materials. However, shiny-surfaced materials are more prone to retaining viral deposits for longer and, therefore, the risk of using them is greater. Consequently, the longer the period of quarantine between each use of such materials the better, or if they are to be reused in quick succession, they should be wiped down to disinfect. Some such materials can of course be accessed by people on their mobile phones, so avoiding the use of church-owned materials.
8. Those distributing such materials should wash or sanitise their hands beforehand and also after collecting up any spares left over at the end of the service. Where those attending public worship bring their own bibles or prayer books, they should not share them during worship and should take them home again afterwards.
9. In services of the Eucharist, at the time of administration of the sacrament, each communicant should wash or sanitise hands before receiving Communion. Face coverings should be taken home or disposed of after exiting the church.
10. Congregational singing may take place subject to the wearing of face coverings. Those who are "performing" need not wear a face mask (provided there is a partition between each performer and others, or a distance of at least

1m is maintained between the performer and others). Church choirs and worship bands can, therefore, sing or play instruments without face coverings, provided their members maintain at least 1m distance from each other and everyone else. Singing or chanting over uncovered Communion elements should be avoided.

11. Use of microphones: consider having sufficient microphones so that they do not need to be shared. If that is not possible use individual foam coverings for each speaker and wash in soap and water after use.

12. To reduce the risk of infection it is recommended that vestments are not shared.

Congregational giving should be encouraged to be by way of standing order or other electronic means. If an offering is to be taken in church, the collection plate should not be circulated but could be by arrival or retiring offering. Those responsible for counting the collection (if any) should ensure handwashing/sanitising before and after doing so. Disposable gloves should be worn for counting and banking.

13. Prayer/healing ministry, laying on of hands: pastoral guidance on these matters is contained in the Pastoral Guidance from the College of Bishops:
<https://www.scotland.anglican.org/coronavirus-updates/>

C. Post-service issues

Refreshments served before or after a service need no longer be on a seated "table-service" basis only. It is acceptable for refreshments to be served from a hatch or equivalent and for church members to drink tea and coffee without a face mask, whether standing or seated. However, when not consuming beverages or otherwise moving about in any refreshment area, face coverings should be worn (as is the case in hospitality establishments). The Government is still "strongly encouraging" table service where possible and so this is a matter for local judgement. Individually wrapped biscuits carry less risk than people helping themselves from a communal plate.

D. Cleaning

1. After any service, the areas to which those attending the service have had access should be cleaned and disinfected, before the building is required for its next use. Where possible, to reduce risk to those undertaking cleaning, cleaning should be deferred until shortly before the next use of the building, since Covid-19 persistence and infectivity on surfaces diminishes over time.
2. Handles, rails, light switches or other areas with which physical contact is likely should be cleaned and disinfected. Guidance on cleaning surfaces is available at: [COVID-19: Guidance for non-healthcare settings](#) and also at <https://www.scdc.org.uk/supporting-communities-safely>

3. Those responsible for cleaning should be provided with disposable gloves to protect their hands from corrosive cleaning substances. Cleaning materials should be appropriate to the surfaces to be cleaned (especially any historic surfaces). Gloves should be disposed of and not reused.
4. Church toilets may be used but toilet seats, handles, doorknobs and locks should be cleaned regularly. Paper towels rather than hand dryers, and liquid soap should be provided, and an individual should be appointed to be responsible for ensuring appropriate cleaning.

E. Other Matters

1. **Baptisms and other services:** guidance is provided in the Pastoral Advice from the College of Bishops referred to above. Specific guidance on baptisms is contained in the Government Places of Worship Guidance:
<https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-for-the-safe-use-of-places-of-worship/>

2. **Church events:** events such as congregational picnics, outings, fundraising activities, fetes, car boot sales, can resume. Any events must be conducted in accordance with continued good hygiene and ventilation practice.

3. **Kitchens:** Church catering should follow the guidance on the handling of food from Food Standards Scotland :
<https://www.foodstandards.gov.scot/consumers/food-safety/coronavirus>

Where a church runs a café, it will also be subject to the Government regulations regarding the hospitality sector.

4. **Church halls:** Vestries' consideration of permitting use by external groups should include
 - a. ensuring clarity on the division of respective responsibilities as between the vestry and the hall user (for example in relation to cleaning)
 - b. the physical capacity of the accommodation, if the view is that there is a need to maintain physical distancing
 - c. the need to adhere to good hygiene practice and
 - d. use of facilities such as toilets and kitchens.
 - e. consideration as to whether the same premises can be made available to a number of different users during the week, given the need for adequate cleaning.
5. Arrangements for the hire of church premises by external groups should ensure that such external users are responsible for adhering to guidance on hygiene and should clearly set out responsibility for cleaning. It is also recommended that both the church and the external user ensure that the

arrangements are adequately catered for under their insurance policies. If there is any doubt as to whether an external user can adequately clean premises after use, consideration will need to be given to the church itself ensuring appropriate cleaning and disinfection.

Scottish Episcopal Church Advisory Group on Re-opening of Churches

APPENDIX 1

Matters to consider before re-opening a church building

1. Your church building may have reopened for individual prayer, in which case the following steps may already have been undertaken. However, if that is not the case and the church has been completely closed during the period of lockdown, there are certain initial matters which should be considered (items a.-g. below) in advance of any use being made of the building. The following initial actions are recommended:
 - a. If your insurers have previously been advised that the building has been closed, notify them that it is now being reopened and follow any guidance which they might provide.
 - b. Air the building by opening doors and any openable windows.
 - c. Check the building for cleanliness. If there are bird droppings or other animal waste be sure not to touch or go near it until proper cleaning can be arranged. If the building has been unoccupied, then cleaning at this stage can be of the routine kind. If some use has been made of the building - for example the rector streaming services – then all surfaces which might have been touched prior to reopening should be thoroughly cleaned. (A link to guidance on Covid-specific cleaning is provided below, for use in situations where the building is in use once again.)
 - d. If you are going to use the water system or toilets, flush all toilets and run the water from all taps and other hot and cold water-outlets for at least five minutes to ensure the water system has been thoroughly flushed through to reduce the risk of legionella and Weil's disease. If you have any concerns seek appropriate professional help/advice. Specific advice from the Health and Safety Executive is available at: https://www.hsa.ie/eng/topics/biological_agents/specific_biological_agents_diseases/legionellosis/covid-19_legionella_information_note.pdf
 - e. Consider whether you need to turn on electrical or heating systems where these have been turned off.
 - f. Undertake a simple visual check of general maintenance items such as electrical systems, emergency lighting and other lighting, fire alarm systems, heating systems, fridges, security monitoring and access systems, water systems and toilets. Seek professional help/advice if necessary.
 - g. Ensure that the font and any holy water stoups are empty.

2. Consult with staff on plans to resume public worship and other church activities. If staff have been furloughed or working from home, ask them to complete a “return to work” form prior to their return to ensure that they can properly return to work. A useful template has been produced by the Church of Ireland in Appendix 2 of its guidance document available at:-

<https://www.ireland.anglican.org/cmsfiles/pdf/Resources/ParishResources/PeopleCommunity/Return-to-In-Church-Worship-Protocols-04.06.20.pdf>

3. Communicate with staff/members prior to reopening on a specific date and explain how services will be conducted and what will be expected of those attending. In particular, provide guidance on who should not attend. Any person who is showing symptoms of Covid-19 should not attend a service. The same applies to any person who is self-isolating, shielding or in any other categories where individuals are advised to remain at home. Similarly, no one should be made to feel that they should attend a service if they are unhappy to do so.
4. Consider resilience planning and develop appropriate contingency measures to address situations such as key personnel catching the virus or having to self-isolate or shield. In the event of an outbreak of Covid-19 in the congregation, anyone affected should follow the ‘Test and Protect’ protocol immediately (<https://www.gov.scot/publications/coronavirus-covid-19-test-and-protect/>) and the Rector/vestry should seek guidance from the local public health authority.

APPENDIX 2

Keeping a Register of Contact Details

The Scottish Government guidance recommends that, for the sole purpose of enabling contact tracing in the event of a Covid-19 outbreak, places of worship maintain limited records of those working there or attending public worship. (It is possible that the Government may make the collection of such information mandatory.) Specifically, it recommends that in relation to staff/volunteers the following information should be collected

- the names of individuals who work or volunteer at the place of worship
- a contact phone number for each member of staff/volunteer
- the dates and times that individuals are at work/volunteering

and that in relation to worshippers, the following be collected

- the name of each worshipper, or when worshippers are attending as a small household group, the contact details for one member of that group – a ‘lead member’
- a contact phone number for each worshipper, or for the ‘lead member’ of a small household group
- date of visit and arrival and, wherever possible, departure time

Any such records will require to comply with data protection principles, should be held confidentially and, ideally, by the rector and should be destroyed securely after 21 days (for example by shredding, or if any such data is held electronically, it should be permanently erased).

Wider guidance on this (written for the hospitality sector), including information on how to collect, store and securely destroy data and on how information will be shared, is available at:

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2021/04/test-protect-multi-sector-guidance-collection-customer-visitor-contact-details-april-2021-update/documents/test-protect-multi-sector-guidance-collection-customer-visitor-contact-details-april-2021-update/test-protect-multi-sector-guidance-collection-customer-visitor-contact-details-april-2021-update/govscot%3Adocument/test-protect-multi-sector-guidance-collection-customer-visitor-contact-details-april-2021-update.pdf>

However, the collection of such information in places of worship carries additional implications. Because attendance at church may be regarded as an indication of religious belief, which is regarded for data protection purposes as “sensitive personal data”, it is recommended that consent is sought from those providing their personal data.

In many cases, contact details for congregational members will already be held in records such as the Communicants or Adherents Rolls but such records will not cover other worshippers, nor will they envisage the sharing of information with NHS Scotland. It is recognised that many individuals make feel sensitively about their

attendance at worship being recorded and such information should not be collected without their consent. It can be emphasised that the collection of such data is in large part for the benefit of the person whose data is being collected so that they can subsequently be contacted in the event of an outbreak.

A template Privacy Notice and Consent Form is available at:

<https://www.scotland.anglican.org/wp-content/uploads/Data-Protection-Privacy-Notice-and-Consent-Form-Version-2-4.8.2020.docx>

It is accepted that maintaining records as the Government recommends will not be straightforward for congregations. One possibility, in relation to regular worshippers, would be for prior notification to be given by email or other communication informing them of the Government recommendation that records be held. Such communication could usefully draw on the information and explanations set out in the template referred to above. Such prior communication could be reinforced by similar information on signage at arrival at church and/or in orders of service or notice sheets. On arrival, worshippers could be asked whether they are willing for a note of their attendance and contact details to be stored for the specific purpose of enabling contact tracing and, if so, their names could, for example, be recorded against a church address list. In all cases such records must be held confidentially and destroyed after 21 days.

Alternatively, copies of Privacy Notice/Consent forms could be made available for completion in church. In the case of visitors whose names are not already held on a church membership list, such a form would need to be used, provided that the visitor is content to complete it. Care should be taken not to share the use of pens, unless users have sanitised their hands immediately before use.

Churches do not have to verify the information provided. Many churches will already benefit from the “not for profit” exemption in relation to the annual fee payable to the Information Commissioner. The Commissioner’s Office has confirmed that collection of data for contact tracing purposes may be regarded as still falling within the benefit of that exemption. If any congregation has concerns about that, an alternative exemption is available if the contact tracing data is processed only in manual and not electronic form.

Further information and guidance on this topic can be found on the website of the Information Commissioner at:

<https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/coronavirus-recovery-data-protection-advice-for-organisations/collecting-customer-and-visitor-details-for-contact-tracing/>