

## Emerging from Lockdown: Guidance for Churches

### Introduction

This version **89** 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.

~~Previous versions made reference to Phase 3 of the Government's *Route Map through and out of the Crisis*. To avoid possible confusion with the numbering of levels (0-5) in the Government's subsequent Strategic Framework, reference to Phase 3 in this version has largely been removed.~~

~~At the time of issue of this version, easing of lockdown restrictions is proceeding. Following the Government's original route map out of lockdown which comprised four phases, the Government adopted its Strategic Framework in October 2020, which stipulated Covid restrictions on the basis of numbered levels, with different parts of Scotland being placed in different levels, depending upon local infection rates. As this version of our guidance is issued, different local authority areas in Scotland are in different levels in the Framework and it is important for Churches to know the level in which their own area is placed at any given time, since that will determine the extent to which restrictions apply. That information is available at: <https://www.gov.scot/publications/coronavirus-covid-19-protection-levels/>~~

~~A consequence of the Government's levels approach is that care must be taken in applying the guidance which follows in the remainder of this document to ensure compliance with the particular restrictions for the locality in which a charge is situated. A useful summary of the restrictions applicable in different levels is available at: <https://www.gov.scot/publications/coronavirus-covid-19-protection-levels/pages/protection-levels-by-area/>~~

~~Throughout the pandemic, the Government has viewed permission to re-open for communal worship as an exception to the general prohibition on mass gatherings. Consequently, it should not be assumed that permission to re-open for communal worship implies permission to resume all other activities which may previously have been undertaken in churches or church halls. The extent to which such other activities remain subject to Government restrictions, is dependent on which level of the Strategic Framework applies and such matters are referred to in more detail below.~~

~~Current public health direction is that appropriate physical distancing requires a separation of 2m. Whilst the Scottish Government has announced some mitigation of this rule for certain sectors (initially hospitality, retail and public transport) the 2m requirement remains the norm. However, the Government is in the course of reviewing the physical distancing requirement and so this may change in the coming weeks. References in this guidance to the "required" or "necessary" distance or similar expressions should be understood to mean whatever distance the Government requires for physical distancing in places of worship (at present 2m) – so if, for example, that is reduced at a future point to just 1m, this guidance should be interpreted accordingly.~~

- ~~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-](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](https://www.scotland.anglican.org/coronavirus-covid-19/test-and-protect/coronavirus-covid-19-get-a-test-if-you-do-not-have-symptoms)

~~This guidance should 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/>~~

~~As from 8 August 2020, those responsible for a place of worship are legally required to “have regard” to guidance issued by Scottish Ministers relating to places of worship (albeit the Government has not gone as far as to make it a criminal offence not to have such regard). The relevant Scottish Government guidance to which regard must be had is available at : <https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-for-the-safe-use-of-places-of-worship/pages/overview/>~~

## **Introduction**

~~As noted above, this guidance note is to assist Diocesan Bishops, clergy and vestries in resuming activities as lockdown eases.~~

[5. Capacity:](#) 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:-

~~At the present time churches are permitted to be open for private prayer and for communal worship. The Government’s previous approach, of stipulating specific caps on numbers for worship has been dropped and the overall number who may now attend service of worship is limited simply by the capacity of the building allowing for physical distancing. Churches, in common~~

~~with all buildings open to the public, are required to display at their entrances their Physical Distance Based capacity. The Advisory Group has issued specific guidance about that which is available at: <https://www.scotland.anglican.org/wp-content/uploads/Guidance-on-Physical-Distance-Based-Capacity-07.05.21.pdf>~~

~~Please note that, unlike regular worship services, there are specific numerical caps on attendance which apply in the cases of funerals and weddings as follows:~~

~~Level 4: Weddings and funerals limited to 20. No funeral wakes or wedding receptions permitted~~

~~Level 3 and 2: Weddings and funerals limited to 50. Wakes and receptions permitted but limited to 50.~~

~~Level 1: Weddings and funerals limited to 100. Wakes and receptions permitted but limited to 100.~~

~~Level 0: Weddings and funerals limited to 200. Wakes and receptions permitted but limited to 200.~~

~~The above numerical caps are subject also to the capacity of the building, having regard to the physical distancing requirement, and so if that capacity is less than the figures quoted above, the lesser figure applies.~~

~~Relevance of previous editions of Guidance: 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.~~

## ~~Principles~~

~~The Advisory Group responsible for preparing this note offers the following general principles to assist churches throughout the process of emerging from lockdown.~~

~~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 as swiftly as possible to bring them into line with any changes in Government and Public Health guidance. Key current Government messages are summarised in the Appendix 2.~~

~~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](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/>~~

~~The current Government approach for places of worship is based less on risk assessment and more on the local application of Government mandated mitigations. From a risk assessment perspective, the mitigations required by the Government are sufficient to reduce a potentially high probability, high impact risk to acceptably low levels of probability and risk. Consequently, the process being followed by vestries is in fact not technically one of risk assessment, but rather that of applying locally the high levels of mandated mitigation required by the Government.~~

### **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.
- ~~1-3. Any churches which have not so far resumed in person activity and who now wish to do so should, if having undertaken a risk mitigation assessment, the vestry wishes to proceed to restart any activities, it should 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>

2.4. 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.

3.6. 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.

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~~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 r~~

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 **mitigation** assessment referred to ~~in paragraph B.2~~ 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. ~~More generally, in current circumstances, the need to undertake ongoing contingency planning becomes even more important—for example, to prepare for the possible implications of the locality in which a church is situated being moved from one level to another (whether upwards or downwards) in Government's Strategic Framework.~~

~~5.7.~~ 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).

~~6.8.~~ It is expected that for the foreseeable future provincially-provided online worship will continue to be available ~~(and which can also be accessed by telephone)~~. 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.

~~7.9.~~ 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 ~~physical distancing~~, self-isolating, wearing of face coverings, regular testing etc. Parents or guardians should ensure that children similarly behave responsibly~~observe such requirements~~. No-one should feel pressure to return to church until they feel comfortable to do so.

~~1. The Advisory Group in producing this guidance has proceeded on the basis of the precautionary principle. In short, in areas where there are elements of doubt, as is inevitably the case in relation to Covid-19, the guidance errs on the side of caution.~~

#### ~~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.~~

~~2.1. 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/vostry should seek guidance from the local public health authority.~~

- ~~3. Calculate the capacity of the building and the number of people who can be accommodated at any one time, so that the necessary physical distancing can be maintained between individuals and households. See A.1 above. Under Scottish Government regulation, those responsible for a place of worship are now legally required to take measures to ensure, where reasonably practicable, that physical distancing is maintained both inside the building and between people waiting to enter the building.~~
- ~~4. Where the church building is not be able to accommodate the likely size of the congregation (allowing also for the possibility of unexpected visitors), it is necessary to consider alternatives. That may include the provision of a blend of online and in-church worship, the ticketing of services to ensure capacity is not exceeded, simultaneous video relay to other premises (eg a church hall), the holding of extra services, or dividing the congregations into smaller groupings so that members might, for example, attend only once every two or three weeks. Each of such alternatives has its own implications, not least for those responsible for organising services or ministering at them, and vestries should be conscious of the additional burden which that might impose. Equally, consideration should be given to the fact that the church community may inevitably have to be divided, rather than being able to meet as a whole.~~
- ~~5. 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. The congregating in groups of people in church car parks or at the entrance to the church should be discouraged. As greater relaxation of restrictions on social interaction is permitted it will become possible to resume some activities which have so far been restricted but, in the meantime, anyone managing queues or flows of congregants should follow physical distance guidance.~~
- ~~6.—~~
- ~~7. 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.~~
- ~~8. 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. (Physical contact between individuals is permitted in the specific context of social gatherings in homes (subject to the restrictions on numbers there) but such permission is not a general permission to hug or make~~

~~physical contact in churches—for example, during the Peace.) Welcomers, like other members of the congregation, must wear face coverings.~~

- ~~9. A procedure should be developed for the filling of pews or seating as people arrive at church, starting with the pews or seating furthest from the entrance. Similarly, on leaving at the end of the service, those nearest the exit should leave first. Seating should be clearly marked to ensure the necessary distance between individuals or between households and it should be made clear to those attending services that they must maintain the requisite distance from each other.~~
- ~~10. 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.cpc.org.uk/catalogue.aspx?cat=630>~~
- ~~11. 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.~~
- ~~12. 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. More detailed information regarding this is set out in Appendix 3. It is possible that the Government may make the collection of such information mandatory.~~
- ~~13. Ideally liturgy should be displayed digitally so as to avoid physical contact with paper-based material. If that is not possible, the Advisory Group has advised that single use orders of service should be used rather than prayer books or other liturgy books, so as to avoid multiple handling within a 72-hour period. Ideally liturgy should be displayed digitally so as to avoid physical contact with paper-based material. If that is not possible, the Advisory Group has advised that single use orders of service should be used rather than prayer books or other liturgy books, so as to avoid multiple handling within a 72-hour period. Some churches have passed personal copies of liturgy books for members to bring each week. Re-usable liturgy books, left untouched in church for 7 days, is a higher risk option that a church could use instead to avoid the expense/waste of single use books and to deal with the risk that people forget to bring personal copies. For re-usable booklets, plain paper or cardboard is a lower risk option for virus persistence, while plasticised covers (e.g. the 1982 Blue Book as published) carry a higher risk of virus still being present. The church temperature may also affect the risk of virus remaining on such liturgies, with higher room temperatures making virus persistence less likely. The church must balance the potential risks of re-using liturgy books against the other, preferable options.~~

- ~~14. Where orders of service are used, they should be distributed on seating in advance of any service or be available for picking up on arrival to minimise unnecessary physical contact. 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. An alternative may be for orders of service to be made available electronically and accessed on worshippers' devices. 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.~~
- ~~15. Because of the potential for the virus to remain on surfaces for the periods mentioned above, items which might be re-used such as church prayer books, hymn books and Bibles should be quarantined for periods mentioned above and should therefore not be stored in a place to which people have easy access. Similarly, consideration should be given to removing any soft furnishings (such as kneelers or hassocks) or other items that are difficult to clean.~~
- ~~16. It is a legal requirement that face coverings be worn in places of worship. A visor or face shield is not regarded as an adequate face covering for this purpose (since such items are for the protection of the wearer, not for the protection of others). Churches should encourage those attending to bring and wear their own face coverings and additionally should make face coverings available on arrival at the church building for any person who does not have their own. Hands should be washed or sanitised before putting on and after taking off a face covering. In services of the Eucharist, at the time of administration of the sacrament, each communicant should wash or sanitise hands before removing/moving face covering, remove/move face covering, receive Communion, and replace/reposition face covering. All such coverings should be taken home or disposed of after exiting the church.~~
- ~~17. There are some exceptions to the requirement to wear face coverings. The person leading an act of worship does not need to wear a covering provided that **either** there is partition (eg screen) between that person and anyone else **or** a distance of at least 2 metres (or, if the Government permits a lesser distance, such lesser distance) is maintained between that person and any other person. In practice therefore, if the clergy person, lay reader or other person leading the service is sufficiently far away from the rest of the congregation (ie at least 2m or, if the Government permits a lesser distance, such lesser distance) they need not wear a covering. Where that distance cannot be maintained, a covering must be worn and so, for example, those administering Communion must wear a covering while doing so.~~
- ~~18. The exemption also applies to "volunteers" in places of worship which would allow a person leading intercessions or reading from a lectern to remove their face covering provided the distancing requirement is maintained, or a partition is in place. Any such volunteer should replace their covering as soon as they have finished the intercessions/reading or similar activity. The exemption should not be seen as a carte blanche for volunteers not to wear a covering, and so volunteers performing other functions should continue to wear one.~~

~~19. Certain categories of individual are legally excused from wearing face coverings, including children under 5. 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/>~~

## **B. Matters arising during 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. Processions may take place if the requisite physical distancing is not compromised. However, no server should assist at the altar.~~

~~The reading of scripture and Intercessions may be undertaken from a fixed lectern or any other position in the church that does not compromise the physical distancing requirement. Similarly, the sermon or other exposition of scripture needs to be delivered in the same manner. Handrails to a lectern or pulpit should be wiped down between use if touched by different individuals during the service.~~

~~The minister presiding at the service should avoid unnecessary movement within the congregation and ensure physical distancing except for the brief moments where such distancing has to be compromised, such as when administering Communion.~~

2.1. 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).

~~Singing, chanting and the playing of instruments: as lockdown eases, restrictions on matters such as singing, chanting and the playing of instruments are gradually being relaxed. What is permitted depends on the level in which the local area is placed. From 31 May 2021, congregational signing is permitted~~

~~in levels 0 and 1 (but not in other levels) subject to the usual requirements of wearing face coverings and social distancing. Singing or chanting over the Communion elements should be avoided.~~

~~The Government guidance on signing, chanting and the playing of instruments should be followed and is available at:~~

~~<https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-for-the-safe-use-of-places-of-worship/pages/individual-and-congregational-worship/#singing>~~

~~At the time of issue of this edition, the Government guidance indicates:~~

~~**Singing, chanting and the playing of instruments**~~

~~Singing, chanting and/or the playing of instruments is permitted in small groups in level 2–0 areas. For example, a small choir and/or band would be permitted to perform. Congregational singing, both indoors and outdoors, is permitted in areas that are in levels 0–1 and is permitted for life events if they are part of an act of worship~~

~~**Congregational singing**~~

~~Where congregational singing is permitted, a risk assessment should be carried out to consider any mitigating measures that may be put in place. Individuals/households in congregations are advised to wear face coverings (see exceptions below that relates to performing or persons leading the worship) and observe 2 metre physical distancing between each participant/household and between participants/households and any others attending,~~

~~**Small group performances**~~

~~Singing, chanting and playing instruments There is no definition of ‘small group’ and it will be down to individual places of worship to determine how many people would constitute an appropriately small group given the size and layout of their building (e.g. how many could fit, physically distanced at the front of the congregation). Individual places of worship should consider physical distancing, undertake risk assessments and put in place mitigating measures where appropriate.~~

~~Scientific studies indicate that it is the cumulative aerosol transmission from both those performing in and attending events that involve singing, chanting and the playing of wind and brass instruments, that is likely to create risk.~~

~~For areas in levels 3–4, where it is essential to an act of worship for an individual to sing or chant indoors, a single individual may do so behind a plexiglass screen without the need for a face covering to be worn. Any screen used should be cleaned regularly and extended physical distancing should be considered.~~

~~With regards to instruments, all types can be played in areas within levels 0–2. For areas in level 3–4, only instruments that do not require breath to operate may be played (for example, church organs, tambourines and other percussion instruments). In all cases, instruments used by more than one person should be cleaned between users.~~

~~Face coverings are not required for the purposes of performing where:~~

~~there is a partition between the person and other persons, or~~

~~a distance of at least two metres is maintained between the person and other persons~~

~~Reference in the Government guidance above to “mitigating measures” could include, in addition to face coverings and physical distancing, matters such as ensuring ventilation, for example by opening windows or doors, particularly in smaller spaces where airflow might otherwise be more restricted.~~

~~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.~~

~~Use of incense poses risks because it may cause some people to cough and thus potentially increase the risk of transmission of the virus. Consideration should be given to whether the risks associated this can be reduced, in particular so as to reduce the risk of coughing. The incense load in the thurible can be reduced and thuribles should not be carried into the congregation. If the building size permits, censuring may be carried out at distance from the main congregation with reduced or minimal incense loads.~~

- ~~2. To reduce the risk of infection it is recommended that vestments are not shared. 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.  
~~Where possible, the use of vestments should be kept to a minimum.~~
- ~~3.1. Use of incense poses risks because it may cause some people to cough and thus potentially increase the risk of transmission of the virus. Consideration should be given to whether the risks associated this can be reduced, in particular so as to reduce the risk of coughing. The incense load in the thurible can be reduced and thuribles should not be carried into the congregation. If the building size permits, censuring may be carried out at distance from the main congregation with reduced or minimal incense loads.~~
- ~~4.1.~~
5. 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. ~~Guidance on the counting of any collection is set out in section E below.~~ 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:

~~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.~~

~~Refreshments may now be offered before or after the service see:~~

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

~~If refreshments are offered, the Government's hospitality guidance should be followed: <https://www.gov.scot/publications/coronavirus-covid-19-tourism-and-hospitality-sector-guidance/pages/overview/> What is permitted will depend on the protection level to which the place of worship is subject. Government guidance indicates that at all protection levels, worshippers must remain seated and be served in their place, and they must wear face coverings (unless exempt) when not seated, for example arriving and departing or moving to toilets. 2m distancing must be maintained between people from different households, and the number of people at each table must not exceed the current restrictions for the area. Particularly where hospitality is offered after worship, those responsible should ensure that people do not mix between tables, and that physical distancing is maintained when moving from the service to where the hospitality is provided.~~

~~1. If refreshments are not to be offered, those attending services could be encouraged to bring their own bottles of water or other refreshments if they wish.~~

~~2.1. 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.~~

## 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 ~~provided physical distancing and good hygiene practices can be implemented. Depending on the specific circumstances, it may be that use needs to be restricted to one person at a time, with a physically distanced queuing system being operated. Since toilet facilities may create additional infection risks, careful consideration must be given as to how regular cleaning can be undertaken. There is evidence that the virus can be transmitted by intestinal infection which means that~~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. **Outdoor worship:** other than worship within the perimeter of the church grounds, any outdoor worship must comply with the Scottish Government requirements on live events available at: <https://www.gov.scot/publications/coronavirus-covid-19-events-sector-guidance/>. Where any such events are permissible, outdoor worship must also comply with the guidance about eucharistic services in the Bishops' Pastoral Advice referred to above. As with indoor worship, outdoor worship should be subject to appropriate risk mitigation assessment.~~
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.—Baptisms may take where they form part of a wider congregational service. See: <https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-for-the-safe-use-of-places-of-worship/pages/individual-and-congregational-worship/>~~

~~**Children's and youth activities:** Sunday school activities, where linked directly to the main act of worship, have been permissible from the point at which public worship was allowed to resume. Whether other activities for children and young people, considered as “unregulated” activities, can proceed is dependent upon the level in the Government’s Strategic Framework applicable to the locality in question. Previous caps on numbers have now been removed. The Government’ guidance should be referred to for further information: <https://www.gov.scot/publications/coronavirus-covid-19-organised-activities-for-children/>~~

~~Where children’s activities take place as part of the main act of worship, they should comply with Government guidance relating to such activities connected to the main service: <https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-for-the-safe-use-of-places-of-worship/pages/general-principles/>~~

~~Where children are in the “main service” they should sit in family groups and young children should remain close to their parent or guardian to ensure that physical distancing is maintained or, as mentioned above, separate children’s activities may be offered provided that appropriate risk mitigation assessment and planning has been undertaken and approved by the Diocesan Bishop. Toys or games used during children’s activities should be washed before next use.~~

~~Specific guidance for youth activities is now available at: <https://www.youthlinkscotland.org/media/5974/youth-work-covid-19-guidance-framework.pdf>~~

~~**3.2. Church events:** events such as congregational picnics, outings, fundraising activities, fetes, car boot sales, can resumes should follow Government restrictions on events: <https://www.gov.scot/publications/coronavirus-covid-19-events-sector-guidance/>, dependent on the level in the Government’s Strategic Framework applicable to the locality. Any -events- must be conducted in accordance with continued physical distancing requirements and good hygiene and ventilation practice.~~

~~**4.3. 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.

~~**5.—Church halls:** use by a church of its own church hall should be done in accordance with the guidance outlined above in relation to services in churches — the same general provisions will apply. It is likely that some~~

~~external groups, and in some cases other denominations or faiths, may be permitted to and wish to restart using church buildings or other facilities such as halls. The extent to which such activities are possible is dependent on the level in the Government's Strategic Framework applicable to the locality and on whether the kind of activity in question has been allowed to resume under Government guidance. Some guidance on specific kinds of activity is contained in the Government's Place of Worship Guidance (<https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-for-the-safe-use-of-places-of-worship/pages/other-permitted-uses/>) but otherwise guidance for the relevant sector should be consulted: <https://www.gov.scot/collections/coronavirus-covid-19-guidance/>~~

~~6.~~

~~7.4.~~ 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)
- ~~a-b.~~ \_\_\_\_\_ the physical capacity of the accommodation, if the view is that there is a need to maintain physical distancing
- ~~b-c.~~ \_\_\_\_\_ the need to adhere to physical distancing and good hygiene practice and
- ~~e-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.

~~7~~

~~8.5.~~ When permitted, aArrangements for the hire of church premises by external groups should ensure that such external users are responsible for adhering to guidance on physical distancing and 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.

~~9.~~ **Meetings:** ~~any meetings of bodies such as house groups taking place in people's homes should comply with the Government rules regarding social gatherings for the level in the Government's Strategic Framework applicable to the locality in question.~~

~~Business meetings on church premises should follow the Government Places of Worship guidance which currently states:~~

~~Managing a place of worship involves a range of activities that will be common to many businesses or organisations, such as committee meetings, recruitment of staff or physical maintenance of the building. Those responsible for the place of worship should consider these activities in line with the general guidance and restrictions for the current protection level. The general expectation is that everyone should work from home if possible and meetings should be held remotely. Places of worship~~

~~which are run by a registered charity should refer to the [OSCR guidance on charity meetings and governance](#).~~

~~A vestry meeting on church premises should be regarded as falling under the Government's category of "non-essential business". However the Government has indicated that a phased return to office working should be permissible in Level 0 (expected for at least some areas of Scotland from 28 June) and it would seem reasonable that vestry meetings on church premises might resume from then, subject to physical distancing, hygiene, wearing of face coverings etc. . Any outdoor meeting of any such groups should observe Government restrictions on outdoor gatherings. A meeting taking place in a church or church hall, such as an annual meeting, when permissible, should observe the same principles set out above in relation to worship (eg physical distancing, good hygiene etc).~~

~~10. **Safeguarding matters:** existing safeguarding policy should continue to be adhered to. It is possible that as lockdown eases, churches may encounter a higher incidence of reporting of issues of abuse which may have taken place during lockdown. The provincial Safeguarding Officers are available should advice be required in relation to this. There may be stories of individual or family trauma, as well as pastoral support in relation to issues of ill health, bereavement, and for those on furlough or facing redundancy or financial difficulties. Similarly, pastoral care for those experiencing the effects of isolation, separation and fractured relationships may be needed. For some, continuing pastoral support may require to be on a remote basis.~~

~~11. **Travel:** The introduction of the level-based approach in the Government's Strategic Framework has implications for travel. A person living in a level 3 or 4 Local Authority area should not travel outside the Local Authority area in which they live - unless required to do so for essential reasons. Also, whilst a person living in a level 0, 1 or 2 Local Authority area may travel within those areas, they should not travel into a level 3 or level 4 area except for essential purposes. Essential purposes comprise a limited range of matters but include 'work' and leading a worship service and attending one's 'normal place of worship'.~~

~~Worshippers may travel in or out of a level 3 or 4 area to attend their normal place of worship. Similarly, those leading a service of worship may cross such Local Authority boundaries.~~

~~There is also a 'work' exception that would allow clergy, lay readers and paid church employees to travel over a level 3 or 4 Local Authority border where necessary for the purpose of undertaking essential pastoral work or other necessary work functions.~~

~~General guidance from the Government on travel is available at: <https://www.gov.scot/publications/coronavirus-covid-19-guidance-on-travel-and-transport/>~~

~~That Government guidance also includes addresses car sharing. In all 5 levels, car sharing is to be avoided unless necessary, but where it is necessary then the specific measures recommended in that guidance should be followed.~~

~~12. **Bellringing:** bellringing activities may resume but subject to physical distancing, the observance of good hygiene practice and the Scottish Government restrictions on the number of households permitted to meet indoors applicable to the locality in question under the Government's Strategic Framework.~~

~~The Scottish Association of Change Ringers has issued advice in May 2020 to its members on safety and maintenance regarding bell towers. Any further advice issued by SACR is available at: <https://www.sacr.org/index.php/covid-19-guidance>~~

~~The requirement to wear a face covering in a place of worship would equally apply to bellringing.~~

~~Should any queries arise in connection with the application of this Guidance they should be raised in the first instance with your Diocesan Bishop.~~

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](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**

### **Key Government Messages**

Any local policy within a place of worship should be clear that:

- ~~If a person is symptomatic (showing symptoms of COVID-19 infection) or has tested positive for COVID-19 they must not attend a place of worship during the period they are required to self-isolate due to the risk that they pose to others. This includes individuals who work at the place of worship;~~
- ~~If a person is not symptomatic or a confirmed COVID-19 case, but is self-isolating due to another member of their household either showing symptoms of COVID-19 or their household member has tested positive for COVID-19, that person must not attend a place of worship. They should instead continue to follow household self-isolation advice;~~
- ~~If person is not symptomatic or a confirmed COVID-19 case, but is self-isolating as a result of other contact (identified through contact tracing), they must not attend a place of worship. This person should instead follow all contact tracing and self-isolation provided to them:  
<https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19/test-and-protect/coronavirus-covid-19-contact-tracing#:~:text=NHS%20Scotland%20contact%20tracers%20will,address%20you%20by%20your%20name>~~

Places of worship should encourage all staff, volunteers and worshippers to maintain personal hygiene. This includes:

- ~~Frequent washing of hands thoroughly for at least 20 seconds with soap and water and drying thoroughly, particularly when entering/leaving the building;~~
- ~~Use of hand sanitiser where hand washing facilities are not available;~~
- ~~Encouraging staff, volunteers and members to avoid touching their faces including mouth, eyes and nose; and~~
- ~~Using a tissue or elbow to cough or sneeze and use bins that are emptied regularly for tissue waste.~~

The Government has encapsulated its key guidance as **FACTS**

- ~~Face coverings should be worn in enclosed spaces~~
- ~~Avoid crowded areas~~
- ~~Clean your hands regularly and thoroughly, and clean hard surfaces after touching them.~~
- ~~Two metre distancing remains the clear advice.~~

- ~~• Self-isolate, and book a test immediately, if you have symptoms of COVID – a new cough; a fever, or a loss of, or change in, your sense of taste or smell.~~

## **APPENDIX 32**

### **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/>