



your experts in church properties

# Coming out of COVID-19 – Opening up church buildings for worship

A Church Growth Trust Briefing Paper  
(October 2020)

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## 1.0 Introduction

In July 2020 in England<sup>1</sup> the government allowed places of worship to open up for public worship. There are still a number of restrictions in place and detailed guidance from the government has been provided on how this should operate<sup>2</sup>. The Government in England introduced on 12 October 2020 the new tier levels, with local Covid-alert levels at medium, high and very high. In all levels places of worship can still be used for worship meetings and other types of gatherings, but in some cases with additional restrictions. This briefing paper sets out some of the government guidelines and aims to make these understandable and accessible for churches; particularly for independent churches. Government guidelines may change and the most up to date guidelines should be adhered to. A link to the current guidelines<sup>3</sup> at the time of publication is shown in Section 9 below.

## 2.0 Who is responsible?

The church who occupies a place of worship and has responsibility for the activities within that building (and its grounds) is responsible for ensuring that people are safe when using those premises for their activities. Where another group (e.g. community group or pre-school) is allowed to use the property, that group is responsible for their activities and will need to carry out their own risk assessments. Care needs to be taken however where other groups are using the property or parts of the property that are also used (at other times) by the church, to ensure that there is clarity on cleaning, maintenance, storage of materials and timings.

## 3.0 Is there a difference between guidance and regulations?

Much of what the government has published is guidance, replacing the legal restrictions under the regulations<sup>4</sup>, and is therefore not a legal requirement to follow. The difference between the two is that guidance does not involve criminal sanctions for any breaches. However, failure to follow the guidance may affect your protection under insurance policies, may still mean you are liable as trustees for not taking seriously your duty of care, and may also negatively impact the reputation of the church, if you are seen to be disregarding advice or guidance and viewed as placing people at risk of infection.

## 4.0 What activities are allowed?

This paper deals specifically with buildings that are used as places of worship. Some activities that take place in church buildings, such as sports, fitness, conferences or live performances, are not

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<sup>1</sup> Different guidelines apply to Wales, Scotland and Northern Ireland, which did not allow places of worship to open in the same way on 4 July 2020. The Welsh Assembly allowed them to open in August 2020, but closed places of worship for gatherings other than funerals and weddings from 23 October to 9 November 2020.

<sup>2</sup> This version of the paper refers to the Government guidance issued/updated on 16 October 2020.

<sup>3</sup> <https://www.gov.uk/government/publications/covid-19-guidance-for-the-safe-use-of-places-of-worship-during-the-pandemic-from-4-july/covid-19-guidance-for-the-safe-use-of-places-of-worship-during-the-pandemic-from-4-july> (although this says 4 July, it was updated on 16 October 2020)

<sup>4</sup> Health Protection (Coronavirus, Restrictions) (England) Regulations 2020

currently allowed. Other activities, such as pre-schools and a self-contained café that is accessed from outside the building, are allowed but have to follow different guidelines. See Section 9 below for links to these.

Outdoor events, unless in the grounds of a place of worship, will be restricted from 14 September to six people.

## 5.0 General matters to consider

Many places of worship are also workplaces and you should therefore be aware of your responsibilities as an employer under existing health and safety law. You also have a duty of care to volunteers, to ensure that as far as reasonably practicable they are not exposed to risks to their health and safety. Risk assessments will need to be carried out for their use of the building, in addition to risk assessments for use by other church members.



Consideration should be given to how accessible your building is for people with disabilities, in line with government guidelines and considering requirements under the Equality Act 2010 where these apply.

Anyone showing symptoms of COVID-19 (a new continuous cough, a high temperature or a loss of, or change in, their normal sense of taste or smell) should not attend the place of worship due to the risk that they pose to others; they should self-isolate at home immediately with other members of their household. Remote participation should be considered, for example by live streaming. This applies equally to individuals who work at your church building.

Where individuals are self-isolating due to a possible or confirmed case of COVID-19 in the household, or because they have been requested to do so by NHS Test and Trace, they should participate remotely<sup>5</sup>.

## 6.0 Getting your building ready

There are a number of things that you need to think about and action you need to take to get your church building ready for you to reopen for worship.

### 6.1 Testing of alarms, lighting etc

It is good practice to ensure the fire alarm, fire-fighting equipment and emergency lighting are in good order and serviced, as well as ensuring fire exits and escape routes are clear and usable. Lighting and heating should be checked and gas and electric testing should be up to date, so the building is safe to use.

### 6.2 Legionella

You should be aware of the possibility of Legionella. Where church buildings have been left unoccupied (or minimally occupied) during the lockdown period, there may be an increased risk of Legionella growth in water systems. You should therefore review your water hygiene

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<sup>5</sup> See guidance on households staying at home: <https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection>

risk assessments for all water systems. As a minimum, you should allow all water in the system to run out and if necessary arrange for specialists to test and clean the water storage and pipework.

### **6.3 Cleaning**

If a building has been unoccupied for more than 72 hours, there is no need to clean to protect against COVID-19, but cleaning buildings that have been empty is good practice for all sorts of other reasons<sup>6</sup>.

## **7.0 Preparing for reopening**

### **7.1 Risk assessment**

The most important action you have to take before reopening your building for corporate worship is to carry out a risk assessment. This will help you decide on whether you should open your building or not and will help you decide what actions you need to take to make the property and grounds safe for people to use and mitigate the risks to them.

Links to examples of risk assessment templates are shown in Section 9 below. Once this has been carried out, you should be able to display a COVID-19-Secure Certificate at the premises (see Appendix 1 for an example).

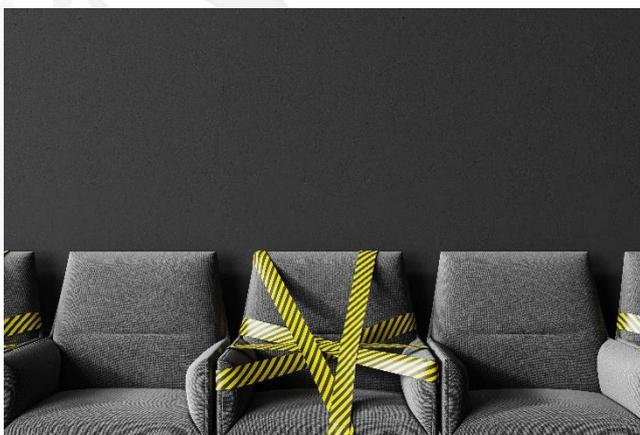
When a building or space is being repurposed as a place of worship (i.e. you are using a building or space which you have not used previously for this purpose), a new fire risk assessment must take place.

### **7.2 Insurance**

The main church insurers have been helpful in offering additional cover for church properties that have been empty during the Lockdown. With regard to your public liability insurance, it is important that you speak with your insurance provider to see if there are any particular measures that you need to put in place. Ansvar have given advice on their website<sup>7</sup> and links are shown in Section 9 below.

### **7.3 Restrictions on capacity**

Although the guidance allows for over 30 people to gather for times of worship in a place of worship and its grounds, this will very much depend on the capacity of the property. Considering the limits on the basis of the capacity of your building is probably best achieved by measuring the space and laying out the chairs in the main worship area and measuring space in corridors, WCs and access points. The number of people permitted to enter at any one time should be limited, so there is a safe distance of at least 2 metres, or 1 metre with risk mitigation (where 2 metres is not viable) between households.



<sup>6</sup> See guidance on cleaning: <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>

<sup>7</sup> <https://www.ansvar.co.uk/covid-19-updates/covid-19-news/>

With medium level alert areas people must not mingle in a group of more than six (other than those they live with or have formed a support bubble with). In high or very high alert level areas people must not mingle with anyone they do not live with or have formed a support bubble with.

The size and circumstance (including ventilation) of the premises will determine the maximum number of people that can be accommodated whilst also facilitating social distancing; this may therefore be lower than 30 people. One-way systems and queuing arrangement will need to be considered.

#### 7.4 Social distancing

Guidelines on social distancing should be followed for your place of worship, including:

- Where possible, adhering to social distancing of at least 2 metres or 1 metre with risk mitigation (where 2 metres is not viable) between households.
- For frequently used places, marking areas using floor tape or paint to help people maintain social distance.
- Avoiding any face-to-face seating and improving ventilation (e.g. by fixing doors open where appropriate).
- Closing non-essential social spaces.
- Introducing socially distanced queuing systems so the flow of groups in and out of the premises can be carefully controlled, reducing the risk of congestion or contact.

Other things you can do to help with social distancing could include:

- Introducing a one-way flow in and out of the premises with appropriate floor markings or signage, with restrictions on accessing non-essential areas. At the end of worship time, this could include worshippers leaving one row at a time (or waiting to be instructed by stewards), in order to prevent crowding at entry or exit points.
- Multiple entry points could be opened, and clear signposting or assistance could be offered to guide worshippers and to avoid congestion.
- Staggering arrival and departure times will reduce the flow at exits and entrances.
- Consider introducing a booking system to control numbers. You may want to consider how prioritisation could be given to people who may have a specific need or requirement.
- Any changes to entrances, exits and queues should take into account reasonable adjustments to accommodate those who need them, such as worshippers with



physical disabilities.

- Advertising set days or times when your building is open solely for those particularly vulnerable to COVID-19, such as those over 70 or clinically vulnerable.
- Consider changing your car park layout to help people socially distance. You may consider asking people to stay in cars until directed by stewards.

#### 7.5 Face coverings

From 8 August 2020, face coverings were also required by law to be worn in a greater number of public indoor settings, including places of worship. Those who are leading services or events in a place of worship, and those who assist them (for instance by reading, preaching,

or leading prayer) do not always need to wear a face covering; although one should be worn especially if physical distancing cannot be maintained (i.e. distributing bread and wine). This exemption does not apply to worshippers, who should wear face coverings consistent with the requirements for any other public space.

## 7.6 Hygiene

On entering and leaving a place of worship, everyone, including staff, should be asked to wash their hands thoroughly for at least 20 seconds using soap and water or to use hand sanitiser if hand washing facilities are not available. Public Health England posters<sup>8</sup> should be displayed to build awareness of good handwashing technique, the need to increase handwashing frequency, avoid touching your face and to cough or sneeze into a tissue which is binned safely, or into the crook of your sleeved arm if a tissue is not available. You should provide hand sanitiser in multiple locations in addition to toilet facilities and appropriate bins.

## 7.7 Cleaning

All surfaces, especially those most frequently touched such as door handles and rails, should be regularly cleaned using standard cleaning products<sup>9</sup>. Sufficient time needs to be allowed for this cleaning to take place, particularly before reopening for the first time. Frequently used objects, surfaces or spaces, including for example doorways between outside and inside spaces should be given particular attention when cleaning.



You need to make a decision on how frequently cleaning should take place based on an assessment of risk and use of the building. Where social distancing cannot be maintained, extra attention needs to be paid to cleaning and hygiene to reduce the risk of transmission.

## 7.8 Toilets

Use of toilets should be kept to a minimum. If they are made available for use, you need to carefully manage them to reduce the risk of transmission of COVID-19. Steps that will usually be needed to make the use of toilets as safe as possible are as follows:

- Using signs and posters (see Hygiene above).
- Using social distancing marking in areas where queues normally form, and the adoption of a limited entry approach, with one in, one out (whilst avoiding the creation of additional bottlenecks).
- To enable good hand hygiene making hand sanitiser available on entry to toilets where safe and practical, and ensuring suitable handwashing facilities, including running water and liquid soap, are available. Communal towels should be removed and replaced with single use paper towels.
- Setting clear use and cleaning guidance for toilets, with increased frequency of cleaning in line with usage. Using normal cleaning products, paying attention to frequently hand touched surfaces, and considering the use of disposable cloths or paper roll to clean all hard surfaces.
- Keeping the facilities well ventilated.

<sup>8</sup> <https://www.publichealth.hscni.net/publications/coronavirus-wash-your-hands-poster>

<sup>9</sup> See guidance: <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>

- Providing more waste facilities and more frequent refuse collection.

## 8.0 Corporate worship times

### 8.1 Marriages, funerals and baptisms

In **England**, marriage ceremonies should have no more than 15 people in attendance, plus those that are working (i.e. the person conducting the ceremony), and social distancing should be strictly adhered to<sup>10</sup>. No food or drink should be consumed as a part of the event.

Funerals should also have no more than 30 people in attendance, plus those that are working, with the same restrictions as with weddings<sup>11</sup>. It is also possible to hold commemorative events, such as a wake or memorial service, providing no more than 15 people are in attendance (plus those working) and gatherings should not take place in private gardens or houses.

In **Wales** from 23 October to 9 November places of worship have been closed for any gatherings other than funerals and weddings. Up to 30 people (plus those working) can attend funerals and weddings, providing there is adequate space (inside and outside), but wakes or memorial services are not permitted.

Where places of worship are open, there is guidance now to allow the full immersion baptism, but the person being baptised needs to be at least 2 metres away from the congregation. Only one person should be baptised at any one time with one person attending to them. The person helping can place their hands on the head of the person being baptised, but should not “cradle” the person or touch them in any other way and should wash their hands after each person is baptised or use a hand sanitiser.

### 8.2 Support groups

If support groups are organised by a charity, up to 15 people are allowed to meet in a public space, which can include your church building. This is allowed in all tiers.

### 8.3 Small prayer and study groups

These would work on the same basis as communal worship within a place of worship or the grounds of a place of worship.

### 8.4 Breaking of bread (communion) and use of shared items

Communion is possible as long as you do not share the same bread and drink from the same receptacle, even when they are given out. There should be individual items and no contact between people. One option is to ask church members (households) to bring their own bread and wine/juice in suitable and closable containers.



Communal or shared items, such as bibles or song books should be avoided where possible; ideally with worshippers bringing their own if they can. Otherwise, these items should be quarantined for 48 hours afterwards. Using overhead projectors/screens or providing single

<sup>10</sup> <https://www.gov.uk/government/publications/covid-19-guidance-for-small-marriages-and-civil-partnerships>

<sup>11</sup> <https://www.gov.uk/government/publications/covid-19-guidance-for-managing-a-funeral-during-the-coronavirus-pandemic>

use items, such as service or song sheets, is recommended.

### **8.5 Singing and wind instruments**

Small groups of singers to lead worship are allowed to sing in front of worshippers both outdoors and indoors. Indoors they should ideally do so behind a plexi-glass screen (as protection and because it is easy to clean). Singing in groups should be limited to a small, set group of people and should not include audience participation. Instruments such as pianos, organs or guitars, and now also including wind instruments, are permitted, but should be cleaned regularly. The government also make the suggestion of using recordings of worship music, but worshippers are discouraged from singing themselves.

### **8.6 Cash offerings**



Members should be encouraged to give their tithes and offerings online and by contactless methods. Where necessary cash collections can be made, but should be in one receptacle, handled by one person (as opposed to being passed around), who should wear gloves, and regular cleaning and hygiene should be maintained.

### **8.7 Live stream**

Where possible you should provide a live stream or make the service accessible in some way to those who cannot attend in person.

### **8.8 Limiting length of meetings**

The government are encouraging services to be as concise as possible to minimise the risk of infection. Discouraging people from staying longer than necessary in the building (and grounds) will also help.

### **8.9 Refreshments**

Food and drink should ideally not be available and eating together discouraged. Hospitality spaces within a place of worship, such as cafes, are permitted to open, but should be limited to table-service, social distancing should be observed, and with minimal staff and customer contact in line with hospitality guidance<sup>12</sup>.

### **8.10 Keeping track of who attends**

In line with government guidance for other venues, including in the hospitality sector, you should assist the NHS Test and Trace service by keeping an accurate temporary record of visitors for 21 days, in a way that is manageable for your place of worship, and assist NHS Test and Trace with requests for that data if needed for contact tracing and the investigation of local outbreaks.

When collecting the names and contact details of people attending your place of worship, you should ask for their consent. This is because of the potentially sensitive nature of the data collected in these circumstances, which is protected by law. You should make clear that giving contact details is optional and is not a condition of attending your place of worship. A suggested template form for collecting consent at places of worship is shown in Appendix 2.

<sup>12</sup> <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/restaurants-offering-takeaway-or-delivery>

### 8.11 Children's work

There is still some uncertainty in the current guidelines about children's work. The guidance mentions that under 18s should be supervised by their parents or guardians, but also says that separate children's activities should be organised in line with principles from general Department of Education guidance<sup>13</sup>.

Children's ministry will need to be carefully considered depending on the space you use and the people involved in running the activity. It may be that volunteers are particularly vulnerable and therefore you do not have the people required to run these activities safely. Likewise, the spaces you use may make physical distancing more challenging.

Taking children and their leaders out of your main worship meeting may make it easier to spread out the congregation in your space, so more can be accommodated at any one time.

## 9.0 Additional information

### 9.1 Government guidance for places of worship reopening

The Government has set out guidelines for places of worship reopening:

<https://www.gov.uk/government/publications/covid-19-guidance-for-the-safe-use-of-places-of-worship-during-the-pandemic-from-4-july/covid-19-guidance-for-the-safe-use-of-places-of-worship-during-the-pandemic-from-4-july>

### 9.2 Legionella

Ecclesiastical Insurance have provided a guide to legionella:

<https://www.ecclesiastical.com/documents/legionellosis-guidance-for-churches.pdf>

The Health & Safety Executive have also given some guidance on legionella:

<https://www.hse.gov.uk/coronavirus/legionella-risks-during-coronavirus-outbreak.htm>

### 9.3 Risk assessments

The Health & Safety Executive has produced a generic risk assessment:

<https://www.hse.gov.uk/simple-health-safety/risk/risk-assessment-template-and-examples.htm>

The Methodist Church have produced a specific risk assessment for reopening building:

<https://www.methodist.org.uk/media/17334/covid-19-risk-assessment-template.pdf>

### 9.4 Insurance

Ansvar Insurance have produced some general guidance on their website, which includes some specific guidance for "getting back to work after Lockdown":

<https://www.ansvar.co.uk/covid-19-updates/covid-19-news/>

### 9.5 Other guidance

The government has produced guidelines on hospitality (cafes and catering), playground use and children's work, cleaning and staying at home:

Hospitality guidance: <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/restaurants-offering-takeaway-or-delivery>

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<sup>13</sup> See guidance on childcare and education: <https://www.gov.uk/coronavirus/education-and-childcare>

Playground use: <https://www.gov.uk/government/publications/covid-19-guidance-for-managing-playgrounds-and-outdoor-gyms>

Sunday school: <https://www.gov.uk/coronavirus/education-and-childcare>

Meetings or small gatherings, as now permitted in other multi-purpose community settings: <https://www.gov.uk/government/publications/covid-19-guidance-for-the-safe-use-of-multi-purpose-community-facilities/covid-19-guidance-for-the-safe-use-of-multi-purpose-community-facilities>

Cleaning: <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>

Staying at home: <https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection>

## 9.6 Posters

Hand washing guidance poster:

<https://www.publichealth.hscni.net/publications/coronavirus-wash-your-hands-poster>

COVID-19 Secure Certificate:

<https://assets.publishing.service.gov.uk/media/5eb97d30d3bf7f5d364bfbb6/staying-covid-19-secure-accessible.pdf>

# Staying COVID-19 Secure in 2020

We confirm we have complied with the government's guidance on managing the risk of COVID-19

## • FIVE STEPS TO SAFER WORKING TOGETHER •

- ✓ We have carried out a **COVID-19 risk assessment** and shared the results with the people who work here
- ✓ We have **cleaning, handwashing and hygiene procedures** in line with guidance
- ✓ We have taken all reasonable steps to **help people work from home**
- ✓ We have taken all reasonable steps to **maintain a 2m distance** in the workplace
- ✓ Where people cannot be 2m apart, we have done everything practical to **manage transmission risk**

Employer \_\_\_\_\_ Date \_\_\_\_\_

Who to contact: \_\_\_\_\_ Your Health and Safety Representative  
(or the Health and Safety Executive at [www.hse.gov.uk](http://www.hse.gov.uk) or 0300 003 1647)

## Appendix 2 – Template form for collecting consent and contact details

### **Consent form for places of worship and those handling sensitive information**

In order to support the NHS Test and Trace programme, we are taking contact details (name and telephone number) for all visitors, as well as recording times entering and leaving [name of place of worship].

In line with guidance issued by the Department for Health and Social Care, we will keep your details safely and in compliance with GDPR legislation for 21 days before securely disposing of or deleting them. We will only share your details with NHS Test and Trace, if asked, in the event that it is needed to help stop the spread of coronavirus. We will not use your details for any other purposes or pass them on to anyone else.

Thank you for your understanding.

If you agree to providing your information for this reason, please complete the following form:

Name

---

Tel. No

---

Signature

---

Date