

Code of Practice - Critical review

Response by XXX to the document causes concern. This note tries to respond to his comments, and suggest a way forward.

Criticism	Discussion	Response
<p>Stewardship Committee perspective. We are about to engage with the insurance companies with the intention of helping them reduce their risk but at the same time not impose conditions that will be impossible for some churches to meet. Where towers can meet high standards then they will get the credit which hopefully will be reflected in the premium. Where they can't (which will be most) the insurer will take the risk and not frighten PCC's into closing towers</p>	<p>The stewardship aspect (or more precisely the compliance aspect of stewardship, which is the committee's main focus) is only one part of the rationale for the CoP. The original motive comes out of the desire to promote quality – quality in training, and quality on the result of training, ie the competence of ringers, and hence the quality of ringing at large. Even with our low key approach, we are perhaps exploiting the compliance aspect to help get the CoP introduced.</p> <p>We could play down the third party aspect. The case for writing anything down, rather than just thinking about the headings and questions, would then rest on the need for the whole team to sing from the same hymn sheet, and to pass on good practice as individuals move on.</p>	<p>Should we play down the potential need to demonstrate good practice to third parties? If so, how much does the overall style need changing?</p>
<p>The general thrust from the H&S advisors is to keep it all very simple. No one is asking us to make it difficult, detailed and complex and we run the risk of shooting ourselves in the foot if we do. In contrast, your documents are quite long and require a reasonably high level of understanding and professional skills to implement</p>	<p>The need for simplicity is agreed. That was the rationale for making the framework (2 sides + introduction) available separately from the guidance (7 sides, which includes all the framework headings).</p> <p>We could probably reduce the number of line items by combining some. In the process, the individual items would become more complex and less specific. That might make the document look less when you skim it, but would it make it any simpler to use it in any practical way?</p> <p>We could consider splitting it into separate documents: either by subject matter (the 4 headings) or by purpose (compliance or quality). But would that really help? Would anyone realistically use one and not the others?</p>	<p>Could anything much simpler achieve the objectives?</p>
<p>I think what you have prepared is excellent material for someone about to run a course for Trainers but I have</p>	<p>OK so the content is not the problem, it is who we direct it to and how we present it.</p> <p>We could state that it is only for use where training is (or would like to</p>	<p>See below</p>

Criticism	Discussion	Response
concerns as to how it will be received on the ground	be) run on formal lines (eg well established bands with teams of trainers, and ringing centres, rather than small bands run by ordinary tower captains). That would take out some of the frighteners, since the vast majority of bands would therefore ignore it. That might be acceptable as a first step (pilot use) but not in ultimately. The vast majority of ringers are taught in 'ordinary' towers, so if they are excluded, most training will be unaffected by it.	
To this end I would recommend that a document of this nature should certainly be "field tested", perhaps with 5 or 6 "carefully-selected-at-random!" bands to gauge their reaction	<p>We had already identified the benefit of a phase of trial use, so the question is how and when. The ideal would be to pilot the scheme with selected bands before going public. To find a suitable spread of suitable bands, give them time to work up a CoP would take several months.</p> <p>Therefore the options are:</p> <p>(a) Don't go public this year, seek out volunteers, get feedback and go public with a revised version some time next year.</p> <p>(b) Go public with the project, and distribute a leaflet about what we are trying to do and why, asking people to volunteer and/or feedback comments.</p> <p>(c) Go public, distribute v1 of the CoP and Guidance for use. Ask for people to give us feedback on how they use it (which is our current plan)</p> <p>(a) and (b) both reduce risk. (b) would also allow us to raise awareness, test wider sentiment to the concept, and get a better sample of pilot users.</p>	Option (b) ?
<p>From another perspective</p> <p>Your document might be based on a questionable premise? "Those who conduct and manage the training of ringers are responsible for: ..."</p>		
<ul style="list-style-type: none"> • <i>Ensuring that their training is safe</i> (OK go with that. It is however a 	I think XXX (and, I admit, the wording in our document) have missed an important point. It is not only the training that should be safe, which	Make this aspect clearer

Criticism	Discussion	Response
general obligation and duty of care for us all, at all times, in all aspects of life, under various pieces of legislation, and not a specific on trainers in the tower. You are not supposed to go berserk and run over the next door neighbours child with the lawn mower but we don't have written methods and procedures for avoiding that. It this context it could be taken to infer a specific responsibility.)	could be seen as a general duty of care. It is also teaching people in a way that they become safe ringers. We need to emphasise that aspect much more. Most ringers become reasonably safe, and avoid situations where there inadequacies would prove hazardous, but some are 'accidents waiting to happen'. It would be unjust to put all the blame on the initial tutor, but the training system as a whole must surely be responsible for its output.	
<ul style="list-style-type: none"> • <i>Ensuring that their training is effective in delivering competent ringers</i> (Hey wait a minute! No way! These are volunteers and there is no contract here to convey any such obligation and we should not suggest it. In offering to pass on your skills to another as a volunteer it is a charitable act and you are not in the same position as a professional teacher. A pupil, parent, PCC cannot impose such a contractual obligation without opening up the subject of risk and reward.... and I'm not sure we want to go there! We must maintain and jealously guard the voluntary status of ringers) 	<p>This goes to the heart of the problem. A parent or PCC probably can't impose such a contractual obligation, but the idea that because something is voluntary, quality doesn't matter should be abhorrent to us. We are not talking about a trainer being sued for incompetence, we are talking about developing a culture where we all as ringers want to do the best (within our ability) for our fellow ringers. This is not a contractual obligation, but it is a practical one. Whether you pay or not, you can vote with your feet, and it is a sad indictment of the current training and support regime in many towers that most trainees do just that. So I submit that we do want to go 'there', where 'there' is better quality training, and better quality ringing as a result. How can a code of (good) practice be based on the assumption that because it is voluntary, nobody should expect anyone to try to do anything well? The purpose of the CoP is to try to improve the way things are done within the voluntary context (whether or not it is jealously guarded).</p>	The introduction needs to make the need for quality more prominent, and decouple it from any questions of whether the training is voluntary.
<ul style="list-style-type: none"> • <i>Encouraging and active interest in training and the development of ringing skills</i> (As above.) 	Also 'as above'. This is what we are trying to stimulate with initiatives like this.	Ditto

Criticism	Discussion	Response
I feel it is a very good comprehensive exposition of good practice and its implementation.	It is not an exposition of implementation, other than in the broadest terms. It is intended to 'name all the parts' of good practice, and the questions are intended to stimulate thought about how to implement it. Maybe it needs spelling out that you can respond to a heading by saying 'we don't do that because...'. The important thing is to ask the question, and to take responsibility for the answer.	
I'm not at all sure that it is useable in general terms at grass roots level and ... quite long and require a reasonably high level of understanding and professional skills to implement ... runs the risk of or binned because it seems too complicated.	That is a real issue. Telling people what to do would be easier for them to understand, but wrong. Encouraging them to make their own decisions is harder, but it is the only way to avoid prescriptive rules and all their problems. Is the problem that people couldn't understand the concept, or that they have been preconditioned to expect something that tells them what to do? If it is binned in some places, I think that is not a 'risk of doing harm', but a 'failure of communication'. In any case, it is voluntary, not compulsory! We should focus on the benefit (or otherwise) to towers that do not bin it.	I suspect that the only way to overcome this is by more careful explanation, and perhaps some examples (but not using real questions, from the framework, because they could be construed as approved responses.
It runs the risk of ... being taken as law by someone in the future in spite of however many times you say it is not intended to be	That is why it has been designed as it has (give or take any defects). It is intended to be as far from prescribing implementation as possible, while retaining an authoritative completeness that could be the basis of external acceptability. So if 'it' is imposed, then drafting its actual implementation will be in the hands of responsible local ringers, working from a sound, ringing based, framework, and not fighting a rearguard action against arbitrary rules taken from outside of the ringing context. The residual 'risk' of imposition would be if PCCs and insurers, knowing that there was a framework for towers to develop codes of practice, insisted that more towers should do so. That would impose work on the tower (to produce a code of practice and get it approved) but providing they weren't doing anything hazardous, it would give them plenty of freedom to produce sensible, workable solutions.	Accept the risk, because there is a counter risk of worse things being imposed if it were not available. Work with Stewardship Committee to manage both risks optimally.

Criticism	Discussion	Response
As a rule of thumb, if you can't get it on 2 sides of A4 then you will miss 90% of the intended audience	That depends on the intended audience! But brevity is a good aim, and we already agreed to try to fit the front line document on a single sheet (however folded). Of course the more explanation we include, the harder it will be to do that. There is much less merit in trying to get the guidance document onto one sheet.	Explore single sheet presentation.
I would therefore suggest a field test and a discussion with Judith Rogers to see what the PR angle on the presentational aspects might be. It may be then in the light of that experience that you will want to refocus it a little to ensure you hit the target.	It was discussed at our joint meeting in the Spring	Continue discussion, including this response.
I really hope that this is a helpful contribution, it is not intended to be negative, but I think you may well get a similar reaction from others. You have convinced me that you know what you want to achieve.... but I think you need to test the solution to make sure that you get the desired outcomes. We can all get lost within the processes.... it has to be worth checking.	As above. Nice to know that the clarity of purpose comes over, since a couple of years ago, it is unlikely that such clarity existed anywhere	