



Joint response provided by PLASA and NRAG in relation to the
Regulation 28 Report to Prevent Future Deaths, Dated 3 November 2019

Issued by the Senior Coroner, Bedford & Luton

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Introduction

This document is the joint response from PLASA & NRAG to the section of the Coroner's Regulation 28 Report to prevent future deaths headed "MATTERS OF CONCERN" sent to PLASA and NRAG by Emma Whitting, Senior Coroner, following the inquest into the death of Russell Bowry.

Firstly, all those contributing to the response to the report wish to express their sincere condolences to the family and others who have been affected by Russell's death. The entertainment rigging sector is a relatively close-knit community; many of us knew Russell and are deeply saddened by what has happened.

Nothing included in this response is intended to relate directly to the specific circumstances leading to the death of Mr Bowry, nor should it be construed as such.

We are grateful for the extension granted by the Coroner's Office relating to our response, as this has allowed the full group to contribute.

Background

PLASA

PLASA is a Trade Association operating across the events and entertainment industries, representing leading specialists in professional audio, AV, lighting, staging, rigging and related technologies.

PLASA is owned by its membership and provides members with advisory and support services across business, technical, safety and regulatory issues, as well as a range of membership benefits, events and training courses including three industry-recognised certification and training programs for riggers (including the NRC) and production technicians.

PLASA's commercial divisions play a crucial role in supporting Association activities. Print and digital editions of magazines [LSi](#) and [LSA](#) lead the market and are read by professionals in over 120 countries, whilst the PLASA Show in London and regional Focus events provide businesses with the opportunity to attend a wide range of seminars about current topics and showcase their technology and services.

The Association actively works with its members, through its Managing Governing Body and specialist working groups, creating opportunities for its membership to share, inform and receive knowledge and enabling businesses and individuals to grow personally and professionally to the benefit of the wider industry.

National Rigging Advisory Group (NRAG)

The NRAG was originally formed in 2005 to advise PLASA during the development of the National Rigging Certificate (NRC).

PLASA supports the NRAG with administration and governance.

The NRAG is a volunteer advisory group with no legal status. We wish to point out for clarify that the NRAG is the National Rigging Advisory *Group*, not *Council*, as referenced in the Regulation 28 Report.

The NRC was up and running by 2008. With the successful implementation of the scheme and a steady stream of Riggers undertaking the assessment, NRAG expanded its focus in 2012 to act as a representative advisory group for the entertainment rigging industry in the UK.

The NRAG's representation is broad. Membership includes companies, venues, freelancers and PLASA.

The NRAG meets quarterly, and regularly invites guests from other Associations, trade bodies and interested parties, including the Health and Safety Executive (HSE).

National Rigging Certificate (NRC)

The NRC is an assessment-based Certification scheme underpinned by an 'NVQ model' structure, measuring competence against agreed Industry Occupational Standards. It was established in 2007 in response to industry concerns regarding safety in rigging practices in the entertainment industry.

It is aimed at individuals who carry out typical rigging activities on site, rather than those who plan the work, although elements of it would almost certainly be useful to such people.

Whilst the NRC provides evidence that a person has met the standards during the assessment and therefore has shown competency to carry out the defined activities, it does not replace any duty on others involved in the work on site to fulfil their own legal duties such as assessing risk, planning and supervising the work.

The NRC is only one part of ensuring a safe system of work is in place, which also requires the involvement of the employers and other relevant parties to be effective.

The NRC includes an element relating to working at height and the assessment includes the *safe use* of the Personal Fall Protection Systems (PFPS) provided at the assessment Centres, in regard of which relevant information, instruction & training is provided by the Centre prior to the assessment.

Candidates are not assessed on planning, designing or specifying PFPS.

The Handbook provided with the scheme outlines the requirements for working at height, including that the work should be properly planned, and carried out in the proper manner, by suitably trained and competent people and with appropriate equipment.

Rigging projects are diverse and unless existing permanent systems in the venue are available & suitable there is likely to be a requirement to consider the management of work at height on a project by project basis. The NRC does not validate the skills required to design such systems.

Responses to Matters of Concern

The Matters of Concern as included in the Coroner's Report are copied below in *italics*.

Matter of concern (a)

Employers in your industry may believe that they can safely delegate to individual riggers the responsibility to plan work at height, supervise it and carry it out safely. Russell Bowry was an NRC level 2 rigger but he was working directly under ELP, whose employees had no NRC qualifications. There was no head rigger. ELP gave evidence that it was their expectation that experienced riggers could be relied upon to ensure their own safety. Yet the riggers from whom I heard, told me that they were not always clipped on;

Matter of concern (b)

Employers in your industry may not realise they are responsible for designing the necessary safety features for work at height, including engaging the services of those who have the right skills to design such systems. Safe systems of work include ensuring that all clipping on points and safety features have the necessary impact requirements to hold a falling person and that the work can be done while the riggers are always clipped on or, that it is safe without clipping on;

Matter of concern (c)

Unsafe working practices are routinely encountered by riggers in your industry and due to the structure of your industry – in which a small number of employers engage a larger pool of self-employed riggers for individual jobs of short duration – riggers appear to have little influence over the fall protection or fall prevention measures that are put in place to keep them safe.

Response

PLASA and NRAG acknowledge the matters of concern and welcome the opportunity to consider what actions may be taken to address these concerns.

Much of the industry is fully cognisant of the requirements for design, planning and supervision regarding work at height. However, we appreciate that this awareness and understanding is not universal, as is the case in many industries.

We also recognise that HSE accident statistics show work at height to be a significant issue.

A range of guidance exists regarding work at height, available from the Health and Safety Executive and other organisations, to help employers understand and discharge their duties. We will continue to promote these resources (see Appendix 1 for a non-exhaustive list). PLASA / NRAG industry guidance is freely available to all on PLASA's website.

We continue to run NRC assessments on a monthly basis.

We have issued a Bulletin to all PLASA Members and current NRC Riggers highlighting the concerns raised and reminding them of the importance of ensuring a Safe System of Work is in place.

We have set up a working group with the aim of reviewing existing industry guidance and to consider the need for the development of further guidance or other information to help employers understand and discharge their duties. This group will seek to engage with others in the industry who may have a role to play or relevant information to contribute.

We will publish our Response along with a [link](#) to the Regulation 28 Report on our website as well as sharing it by other by means.

END

Appendix 1

Non-exhaustive list of relevant regulations & guidance as at time of writing:

Health and Safety at Work etc Act 1974

Work at Height Regulations 2005

Management of Health and safety at Work Regulations 1999

Construction (Design and Management) Regulations 2015

Personal Protective Equipment at Work Regulations 1992

Freely available guidance:

<https://www.hse.gov.uk/event-safety/falls-from-height.htm>

[Working at Height – A brief guide](#)

[HSE Step by step guide](#)

<https://www.bbc.co.uk/safety/resources/aztopics/working-at-height-general>

<https://www.bbc.co.uk/safety/resources/aztopics/studio-and-event-rigging>

[NAA Guidance for Rigging](#)

[NRAG Roles & responsibilities guidance](#)

[Event Structures Code of Practice](#)

[Access industry forum safety steps](#)

[Risk Assessment – A brief guide INDG 163](#)

[Inspecting fall arrest equipment INDG 367](#)

[Using contractors - A brief guide INDG 368](#)

[Guidance on the Construction \(Design & Management\) Regulations \(L153\)](#)

[CDM 2015 and the entertainment industry](#)

Guidance available either for sale or with a subscription:

[IStructE Temporary Demountable Structures guidance](#)

[ABTT COP011: Working at height in theatres](#)

[NSL Working at height handbook](#)

END