



SAFEGUARDING INFORMATION FOR VESTRY MEMBERS.

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Purpose

The purpose of this document is to provide information for Vestry members of the Scottish Episcopal Church to enable them to –

1. Understand key concepts in safeguarding in the context of the Scottish Episcopal Church
2. Understand their role in safeguarding
3. Discharge their legal duties as charity trustees in relation to safeguarding.
4. Understand where to obtain help and assistance.
5. Have awareness material for reference.

It is intended that this be a “living document” which will be subject to amendment and update, according to legislative and policy changes, operational requirements and feedback from users.

What is Safeguarding in the Scottish Episcopal Church?

Safeguarding is a fundamental aspect of the life of the Scottish Episcopal Church.

Our Safeguarding Policy (2020) is attached at appendix A to this document, but in summary Safeguarding is about protecting individuals and congregations from harm, mitigating risks and keeping people as safe as possible, focusing particularly on the needs of vulnerable people.

Vulnerability manifests itself in many ways but there are two specific groups of people who are deemed to be especially vulnerable in law and policy namely-

Children-for the purposes of Safeguarding policy everyone under 18 years of age is a child. The law in Scotland makes a number of distinctions between younger (generally under 16 years old) and older (generally 16-17 years olds) but these distinctions are largely irrelevant in terms of Safeguarding.

Vulnerable Adults- for the purposes of Safeguarding policy the following definition is adopted- an adult who by reason of an intellectual disability, mental illness or other impairment, age or other circumstance, has reduced capacity, whether permanently or temporarily, to protect themselves from abuse. This includes any adult who:

- is ministered to in their home

- is dependent on one or more persons for support such as in the case of an accident, illness or birth of a child
- experiences a life crisis or natural disaster, such as the death of a family member, relationship breakdown or loss of employment, or loss of home and possessions
- through poverty, war or civil strife, displacement, ethnicity, sexual orientation or gender, or other social and cultural factors has a diminished ability to protect themselves from abuse

Outwith of those definitions there may be a range of circumstances where individuals may be, or be perceived to be vulnerable, which may be broadly categorised as “situationally vulnerable,” in ways which can be very difficult to define.

A critical point to recognise is that everyone is an individual, with individual needs and that there is rarely a “one sizes fits all” approach possible where concerns arise for an individual or group of people.

What is a Safeguarding “concern.”

There is no specific definition of a “concern.” This is quite deliberate as it is impossible to be prescriptive – additionally an academic “definition” if rigorously applied may actually be counter-productive in that it may cause people not to raise matters which should be.

The practical “definition” of a concern is that if a matter relating to a possible safeguarding issue is causing you to need to take advice, to “wonder” whether you need to take advice or is a matter that you “think” should be raised, you should raise the matter without delay.

A concern may come to your attention in a number of ways, which could include-

- an individual disclosing to you verbally, by email, in writing or by any other means that they have been the victim of abuse. *If you receive a verbal disclosure, it is very important that you listen to what the person is telling you and that you only ask questions to confirm that you have understood what they are telling you.*
- another individual bringing a concern to your attention that does not directly relate to them.

- Discussion in the Vestry or another group within your church which suggests that someone is at risk, in terms of their safety, wellbeing or health.

It is impossible to be prescriptive as “concerns” may be come to your attention in a wide number of ways.

How to raise a Safeguarding “concern.”

Where there is any suggestion of an immediate risk to life you should telephone 999 and ask for the police.

Otherwise, you should raise the matter with either your Priest (or another member of Clergy) or your charges PVG Co-ordinator, who will-if they cannot provide advice directly- will make contact with the Provincial Safeguarding Team.

Where you have no access to a Priest or a PVG Coordinator you should contact the Provincial Safeguarding Team as follows

Provincial Safeguarding Team - Contacts			
Name	Position	Contact details	Deals with
To be notified	Head of Safeguarding	T-0131-225-6357 M- Email- safeguarding@scotland.anglican.org	Any safeguarding matters. Training, management of offenders, casework and advice.
To be notified	Assistant Head of Safeguarding	T-0131-243-1354 M- Email-	Leads on PVG. Advice on all aspects of safeguarding.
Rhiannon Morrison	PVG Team	T-0131-225-6357 Email pvg@scotland.anglican.org	PVG administration and advice on processes.
Jane Harkin	PVG Team	T-0131-225-6357 Email pvg@scotland.anglican.org	PVG administration and advice on processes.

What happens when you raise a “concern.”

You should listen carefully to, and act upon any advice that is given.

Matters relating to Safeguarding often involve sensitive personal information and could include matters that are of an extremely personal and distressing nature. You will receive advice appropriate to your role and the sensitivity of the matter. You should not necessarily expect to be updated on all aspects of matters raised for these reasons and must ensure that any and all sensitive personal information is handled in accordance with Data Protection legislation and regulations.

Where matters raised are potentially criminal in nature the starting position is always that such matters should be reported to the police. Where these matters involve potential offences against children or vulnerable adults they will be reported to the police.

Often matters involving vulnerability may be matters for local Health and Social Care Partnerships and third sector support agencies operating locally or across Scotland.

It is important to recognise the limitations of support which you may be able to provide and to seek advice as to how best to access statutory support, which may be the best option for individuals requiring supportive interventions.

Church Process and Policy.

The Scottish Episcopal Church Website contains a range of information on processes and the Code of Canons. It is not the intention of this document to rehearse all of the available information, but a summary is as follows-

The Scottish Episcopal Church Safeguarding Policy (agreed and ratified at General Synod 2020) is attached as at appendix A.

The Scottish Episcopal Church PVG guidance (issued May 2025) is attached as at appendix B. More information on PVG (the Protection of Vulnerable Groups) can be found later in this document.

Information on the Scottish Episcopal Church complaints, grievance and associated policies can be found on the church website which is at www.scotland.anglican.org

The full Code of Canons , which constitutes Church Law, can be found on the website. Relevant Canons to Safeguarding include –

- Canon 65 – Of Safeguarding in the Church
- Canon 54- Of Offences and Trials

- Canon 53-Of the Resolution of Situations of Pastoral Breakdown and Other Differences and Disputes

Safe Recruitment

Safe Recruitment is the term used to ensure that people who may be involved in the work of the church, especially in working with children and vulnerable adults, are recruited to posts in such a way as to minimise the risk to others.

Before considering whether a person is suitable or not for such work Vestries need to consider-

- Has the individual been given the time to learn about the charge and those attending on a regular basis? How long this takes depends upon a range of factors, including how active the charge is, how often people meet and worship and how many groups and events the church is involved in.
- Taking up of references, for each and every post. Best practice, indeed, what would be considered the minimum in many organisations is to obtain a professional reference and a personal reference.
- Only then, and where the work would constitute a “regulated role” within the meaning of the Protection of Vulnerable Groups (Scotland) Act 2007, as amended by the Disclosure (Scotland) Act 2020 should an application be made by the individual to join the PVG scheme.

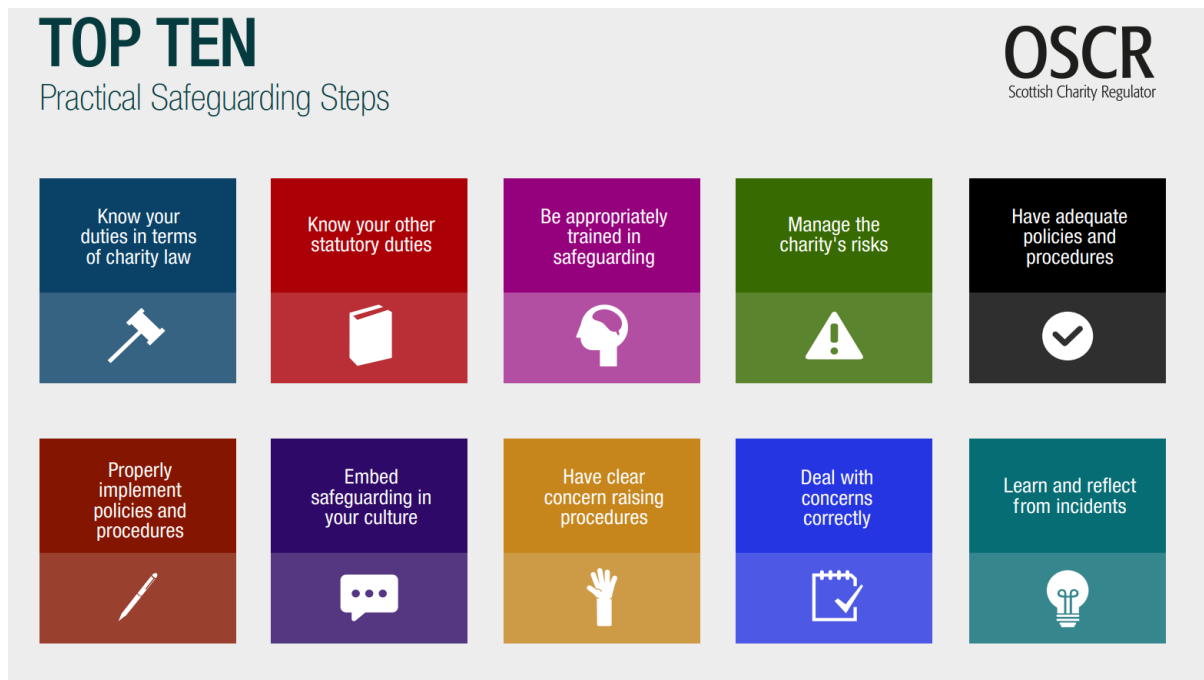
The PVG Scheme

The PVG scheme is designed to ensure that risks to vulnerable people are mitigated by ensuring that anyone undertaking certain types of work (the terminology in the Act was “regulated work” and is now “regulated roles”) undertakes a form of vetting known as “Enhanced Disclosure.” Enhanced Disclosure checks for criminal convictions and other “relevant material” which may suggest that an individual poses a risk to vulnerable people.

The latest Scottish Episcopal Church PVG Guidance (issued May 2025) is attached at appendix B. Please note – **IT IS A CRIMINAL OFFENCE FOR AN ORGANISATION TO ALLOW AN INDIVIDUAL TO UNDERTAKE A REGULATED ROLE UNLESS THAT INDIVIDUAL IS A MEMBER OF THE PVG SCHEME.** The liability here sits with the individual charity, i.e. an individual charge. Therefore, as Vestries you must ensure that you take, and act upon advice in relation to PVG. The responsibility for PVG scheme membership for Clergy sits with each Diocese, with the bishop being personally responsible, not Vestries.

Vestry Responsibilities

As Charity Trustees Vestry members hold legal responsibilities in relation to Safeguarding. The following pictogram from the Office of the Scottish Charity Regulator sets those out-



Full information can be found at the OSCR website (www.oscr.org.uk) but in summary you may wish to consider-

- All SEC charges have adopted and ratified the SEC Safeguarding Policy (2020)
- Much of managing Safeguarding risks comes from being able to access help from the Provincial Safeguarding Team.
- Policies and practices are in place across the SEC, with clear procedures for raising concerns, through PVG Coordinators and Clergy to the Provincial Safeguarding Team, who can also assist with dealing with concerns correctly.
- Appropriate training. This starts with awareness, which this pack is designed to assist with further training opportunities to be made available. Clergy and PVG Coordinators are already offered role specific training.
- **There is always help available, all you need to do is ask for it.**

APPENDIX A**SEC Safeguarding Policy****Principles and Commitments**

The witness of Scripture recognises and affirms God's love for all members of the human family and the priority given in Jesus' ministry to children and the vulnerable of society. His ministry was one of welcome for all. To be free to worship and participate in the life of the Church, people need to feel safe and included. Good safeguarding practice helps to ensure that everyone is welcome in a church community. Good safeguarding practice is part of how we value people, and treat them with respect.

Clergy and church workers, both paid and volunteers, undertake ministry in the church in a variety of forms including the provision of spiritual advice and support, counselling, assistance in times of need, education and activities for children and young people, and these take place in a variety of situations within a church community. In their ministry relationships clergy and church workers must act in the best interests of those to whom they minister, always recognising that anyone may be vulnerable.

The five commitments in this policy are based on the Anglican Communion Safe Church Charter which was adopted by General Synod in 2016. Each is followed by a statement of the safeguarding principles that underlie the commitment.

Full details of safeguarding governance structures, practice and procedure are contained in Canons 65 and 54 and in a range of guidance and practice notes available from the General Synod Office and the SEC website. The Provincial Officers and Provincial Safeguarding Committee are responsible for overseeing and updating guidance and practice notes in line with current best practice. A schedule of safeguarding terminology and definitions is appended to this policy.

In seeking to make the Scottish Episcopal Church a safer place for all people, we make the following commitments:

Culture of safety

- 1. We will promote a culture of safety in our congregations and church organisations and communities by education and training to help clergy, other church workers and participants prevent the occurrence of harm and abuse.**

The church bears witness to the gospel message of salvation by its teaching and its life as a community. Church communities seek to be like the kingdom of God, but humanity is imperfect, and people harm one another, both intentionally and unintentionally. Only in heaven will God's people be completely free and safe from harm. On Earth we need safeguards to enable the church to become more like the kingdom of God.

There are many forms of abuse, but abuse is always wrong. The harm caused by abuse can be deeply destructive and have lifelong effects. People in the church must work together to prevent abuse, seek justice when it has occurred, and care for those affected by abuse.

It is the responsibility of all who are called to positions of authority and leadership in the church to promote and exercise good safeguarding practice. In Acts 20: 28-30 Paul speaks to the elders of the church at Ephesus of their responsibilities, recognising the difficulties that lay ahead for them:

Keep watch over yourselves and over all the flock, of which the Holy Spirit has made you overseers, to shepherd the church of God that he obtained with the blood of his own Son. I know that after I have gone, savage wolves will come in among you, not sparing the flock. Some even from your own group will come distorting the truth in order to entice the disciples to follow them.

This passage speaks to the church today of the need always to be alert, and of the harm and distress caused by those who have perpetrated abuse in the church, and of those who have concealed abuse or minimised the effects of abuse.

People who are known or suspected abusers may seek to participate in the life of a church community. They include those charged with or convicted of criminal offences involving sexual abuse. While ministry to them is encouraged, this should not compromise the safety of others, especially children, young people and vulnerable adults. Those who pose a risk to vulnerable people should not be permitted to participate in a leadership role.

Creating and maintaining a culture of safety in the church requires the involvement of all who participate in the life of church communities, not just clergy and church workers. Training to understand and prevent the occurrence of abuse should be part of the formation and ongoing development of clergy. Church workers should receive safeguarding training relevant to their area of responsibility in the church's ministry. Those charged with church governance should receive training in their responsibilities for implementing safeguarding policy. All participants in church communities should receive teaching to help them understand the principles of safeguarding and its importance to a Christian way of life.

Creating and maintaining a culture of safety in the church requires more than the adoption of rules and policies. These need to be effectively implemented, and their implementation monitored. The Anglican Communion's Safe Church Commission *Guidelines to enhance the safety of all persons especially children, young people and vulnerable adults within the provinces of the Anglican Communion* is based on the Safe Church Charter, and the guidelines are adopted as benchmark against which to assess implementation of the Scottish Episcopal Church's safeguarding policy on an ongoing basis.

Suitability for ministry and positions of trust

- 2. We will have and implement policies and procedures to assess the suitability of persons for ordination and clergy appointments, and lay appointments to positions of responsibility and trust in the church including checking their background.**

Safer recruitment practice is an important means to prevent abuse in the church, as past conduct is an indicator of behaviour in both the present and the future. Assessment of clergy and church workers' suitability for ministry should include background checking. The purpose of background checking is to identify any information which indicates that the person may pose a risk to the safety of others.

Background checking involves a criminal record check where permitted or required by Government legislation. Clergy background checks require bishops to disclose ministry suitability information.

In assessing suitability for training for ministry and ordination, discernment processes should include background checking.

Safer recruitment practice for lay appointments, both paid and voluntary, should include publicising the paid position or voluntary role, interviewing candidates and taking up references.

Information from background checking is taken into account in assessing whether the person is suitable to undertake a ministry role in the church.

Practice of ministry

- 3. We will adopt and promote by education and training standards for the practice of ministry by clergy and other church workers, whether employees or volunteers, who share in specific areas of the church's ministry.**

There is an intrinsic imbalance of power in a ministry relationship between clergy and other church workers and those to whom they minister. This arises because they have spiritual authority over others, specialised knowledge and expertise, or access to the leaders and resources of the church. It is always the responsibility of the clergy and church workers to maintain appropriate boundaries in their ministry relationships.

Clear standards for the practice of ministry should be understood and adopted by all clergy. Other church workers should be provided with a job description that sets out the responsibilities for their particular role in the church's ministry. Training on standards of behaviour helps clergy and church workers to maintain appropriate boundaries in their ministry relationships. Mentoring, supervision, peer support and ministry review are effective ways of promoting good safeguarding practice.

Effective responses to abuse

- 4. We will have and implement policies and procedures to respond properly to allegations of abuse against clergy and other church workers that include:**
 - 1. making known the procedure for making complaints;**
 - 2. arranging care and advice for any person making a complaint of abuse;**
 - 3. the impartial determination of allegations of abuse against clergy and other church workers, and assessment of their suitability for future ministry;**
 - 4. providing support for affected congregations and church organisations.**

Transparency and openness, accountability and justice are guiding principles in responding to abuse.

Clergy and church workers have power and authority by virtue of their role in ministry and are therefore in a position of trust. Some may be unaware of their power and unconsciously exercise it in abusive ways to achieve their own desires. Others intentionally use their power to overcome the resistance of their victims. Clergy and church workers who misuse their power and authority by abusing others have betrayed the trust conferred on them and should be held accountable for their conduct.

The church has a duty to take allegations of abuse seriously, and not to minimise or cover up allegations to protect the church's reputation. Concealment of abuse is an abuse of power and is a failure to act with justice and integrity. Survivors of abuse are further harmed when the church fails to act upon their complaints.

Support where there is abuse**5. We will provide support for the abused, their families, and affected congregations and church organisations and communities by:**

- 1. listening with patience and compassion to their experiences and concerns;**
- 2. offering spiritual assistance and other forms of care.**

Abuse is behaviour which causes harm to another person or is undertaken with the intention of causing harm to another person, or which may place another person at the risk of harm. Types of abuse include, but are not limited to, bullying, concealment of abuse, cyber abuse, emotional abuse, financial abuse, gender-based violence, harassment, neglect, physical abuse, racial abuse, sexual abuse and spiritual abuse.

When abuse occurs more than one form of abuse can be involved. In the church, other forms of abuse can be accompanied by spiritual abuse. Perpetrators of abuse sometimes silence their victims by misusing their spiritual authority, such as by saying that compliance with the abuse is God's will or threatening exclusion from the church if the abuse is disclosed.

Abuse often occurs and continues unimpeded because of the unequal power relationship between the abuser and their victim. People will be afraid to disclose abuse where there is a culture of silence in the community and the church. When people disclose alleged abuse, the Church should listen without judgement, respond with compassion and maintain confidentiality, therefore church leaders and members should not make comments or express opinions on such allegations.

A variety of social and cultural factors can contribute to a person's vulnerability to abuse, such as the poverty, ethnicity, sexual orientation, gender, and physical or intellectual disability of the victim. Other circumstances in which a person may be vulnerable include bereavement, relationship breakdown, loss of employment and other life changing events.

People who have suffered abuse must never be pressured to forgive their abuser. Further harm can be caused through pressure to forgive. They may condemn themselves and believe they are condemned by others if they are not willing or able to forgive. They may see themselves as 'not being Christian', and beyond the forgiveness of God.

Abuse does not only affect the person who has suffered abuse. Secondary victims include families both of the victim and the alleged abuser, friends and church communities. The way in which the church cares for victims must be centred on the individual's needs. Some situations will require specialist support from outside the church.

Those who provide care to primary and secondary victims of abuse should receive relevant training. They also require support in their ministry. It is often not realised that caring for victims can be emotionally and spiritually draining, especially where care is provided for a long period of time. Support of those providing care helps to sustain them in this ministry.

If the principles outlined in these policy commitments are followed, the Scottish Episcopal Church will be a place of enhanced safety for everyone, where:

- **clergy and church workers act with integrity**
- **victims of abuse receive justice**
- **clergy and church workers who commit abuse are held accountable**

- **church leaders do not conceal abuse**

DEFINITIONS

These definitions are for use in conjunction with the Scottish Episcopal Church (SEC) safeguarding policy commitments and associated guidance and practice notes.

abuse means behaviour which causes harm to another person, or is undertaken with the intention of causing harm to another person, or may place another person at the risk of harm. Types of abuse include:

- bullying
- concealment of abuse
- cyber abuse
- emotional abuse
- financial abuse
- gender-based violence
- harassment
- neglect
- physical abuse
- racial abuse
- sexual abuse
- spiritual abuse

Abuse of children and young people is commonly called 'child abuse'. Abuse of a vulnerable adult can take many forms. Abuse in a family or domestic context is commonly called 'family violence' or 'domestic violence' or 'domestic abuse'.

age of consent means the age at which a person can legally consent to sexual activity.

allegations means the allegations which are the subject of the complaint.

authorised means authorised by a licence or other similar authority issued by the SEC.

bullying occurs where a church worker engages in behaviour directed to a person which is repeated, unreasonable (such as where it is victimising, humiliating, intimidating or threatening), and creates a risk to the person's health and safety. It includes:

- making derogatory, demeaning or belittling comments or jokes about someone's appearance, lifestyle, background, or capability
- communicating in an abusive manner
- spreading rumours or innuendo about someone or undermining in other ways their performance or reputation
- dismissing or minimising someone's legitimate concerns or needs
- inappropriately ignoring someone, or excluding someone from information or activities
- touching someone threateningly or inappropriately
- teasing someone, or playing pranks or practical jokes on someone
- displaying or distributing written or visual material that degrades or offends.

It does not consist of conduct of a church worker carried out in a reasonable manner, such as:

- disagreeing with or criticising someone’s beliefs or opinions or actions in an honest and respectful way
- giving information about inappropriate behaviour in an objective way to the person or people concerned and to any other person with a proper reason for having that information
- setting reasonable performance goals, standards or deadlines
- giving information about unsatisfactory performance in an honest and constructive way
- taking legitimate disciplinary action

‘Cyberbullying’ is a form of bullying which involves the use of technology such as sending text messages and emails.

care means any form of support either spiritual or secular provided for those affected by abuse.

charter means the *Charter for the Safety of People within the Churches of the Anglican Communion* and the *Guidelines to enhance the safety of all persons -especially children, young people and vulnerable adults – within the provinces of the Anglican Communion* which form the basis of the SEC policy and guidelines. <https://www.anglicancommunion.org/media/349360/ACSCC-Guidelines-2019-English.pdf>

child means anyone who under the applicable law has not attained their majority. In Scotland the law defines a child as anyone under the age of 16 years. For the purposes of the Protection of Vulnerable Groups Act a child is anyone under the age of 18 years. For the purposes of SEC safeguarding policy a child is anyone under the age of 18 years.

church authority means a diocesan bishop or a person or body having authority to ordain, license, elect, appoint, dismiss or suspend a church worker.

child pornography describes or depicts a person who is or who appears to be a child engaged in sexual activity, or in a sexual context. It can include any film, printed matter, electronic data, computer image and any other depiction.

church community means a congregation or church organisation in which ministry is undertaken.

church workers means clergy and lay workers, whether stipendiary or non-stipendiary, employed or volunteers.

civil authority means the police or other authority to which a report of known or suspected abuse may or should be made.

clergy means bishops, priests and deacons of the church.

clericalism means clergy encouraging and taking advantage of deference to them.

complainant means a person who makes a complaint that they were abused, or a person making a complaint on behalf of the primary victim.

complaint means a complaint of abuse against a church worker.

concealment of abuse means the failure without reasonable excuse to disclose known or suspected abuse by a church worker to the SEC Safeguarding Officer, church authority or civil authority.

cyber abuse occurs where a church worker engages in behaviour involving the use of technology which harms or threatens to harm a person socially, psychologically or physically. It can take place in various online spaces, like chat rooms, on social networking sites, through emails, messaging apps or

on message boards. It includes a range of behaviours which are sometimes described as 'cyberbullying', 'cyberstalking', and 'image-based abuse'.

emotional abuse occurs where a church worker engages in behaviour directed to a person where the person suffers, or is likely to suffer, harm to their health and safety. It includes:

- making derogatory, demeaning or belittling comments, jokes or gestures about someone's appearance, lifestyle, background, or capability
- ridiculing a person, including the use of insulting or derogatory terms to refer to them
- coercing, manipulating, threatening or intimidating a person

It does not consist of conduct of a church worker carried out in a reasonable manner, such as:

- disagreeing with or criticising someone's beliefs or opinions or actions in an honest and respectful way
- giving information about inappropriate behaviour in an objective way to the person or people concerned and to any other person with a proper reason for having that information
- taking legitimate disciplinary action.

Emotional abuse is commonly called 'psychological abuse'.

financial abuse occurs where a church worker seeks personal advantage or financial gain for themselves or their family from their position or from a ministry relationship, beyond their stipend or wage and recognised allowances. Where it involves theft, it will constitute a criminal offence. It includes soliciting a gift or loan, whether monetary or otherwise, from a person with whom there is a ministry relationship.

gender-based violence means any act that is perpetrated against a person's will and is based on harmful gender norms and unequal power relationships. It encompasses threats of violence and coercion. It can be physical, emotional, psychological, or sexual in nature, and can take the form of a denial of resources or access to services. It inflicts harm on women, girls, men and boys.

grooming occurs where a church worker deliberately undertakes actions with the aim of engaging and influencing an adult or a child or young person for the purpose of sexual activity. In the case of a child or young person, the church worker may groom them and those close to them, such as parents, family members and other church workers, with the aim of having sexual activity with the child or young person. In the case of an adult, the church worker may groom the adult and those close to the adult such as family members, other church workers and church communities, with the aim of having sexual activity with the adult. Grooming commonly precedes other forms of sexual abuse and can involve contact involving the use of technology to build the relationship with the child or adult.

harassment occurs where a church worker engages in unwelcome conduct, whether intended or not, towards another person where the person feels with good reason offended, belittled or threatened. This behaviour may consist of a single incident or several incidents over a period of time. It includes:

- making unwelcome physical contact with a person
- making gestures or using language that could reasonably give offence, including continual and unwarranted shouting
- making unjustified or unnecessary comments about a person's capacities or attributes
- putting on open display pictures, posters, graffiti or written materials that could reasonably give offence

- making unwelcome communication with a person in any form such as phone calls, email, text messages
- stalking a person

‘Cyberstalking’ is a form of harassment which involves the use of technology such as sending text messages and emails.

image-based abuse occurs where a church worker engages in the taking of, distribution of, or threat to distribute, intimate, nude and/or sexual images of another person without their consent. The images may be original and photoshopped photos, drawn pictures, and videos. It is called ‘sexting’ when technology is used to distribute the image. It is called ‘sextortion’ when the church worker tries to get sexual favours, money or something else, by threatening to reveal intimate images of the other person, or requests money, additional images, or sexual favours for removing the images online.

lay worker means a lay person who:

- is authorised by the bishop of a diocese
- is appointed, elected or employed by or on behalf of a church community
- as a volunteer, undertakes ministry in the church.

ministry means the work involved or the situation which exists when a church worker has responsibility as part of their role for the wellbeing of others. Ministry involves a wide range of activities and roles including those involved in working with children, pastoral visitors, counsellors, spiritual directors and other areas of ministry that focus on a specific area or group of people or particular needs, as well as all persons in ordained ministry.

ministry relationship means a relationship between a church worker and any person for the purposes of ministry.

ministry suitability information means a written statement by a church authority of a province about a church worker that discloses whether or not there has been, and, if there has, the substance of any allegation, charge, finding or admission of the commission of a criminal offence, or the breach of the province’s rules regarding the conduct of church workers, including rules relating to sexual conduct and conduct towards children, young people and vulnerable adults.

physical abuse occurs where a church worker commits an intentional or reckless act, uses force or threatens to use force causing injury to, or involving unwelcome physical contact with, another person. It includes:

- slapping
- hitting
- punching
- shaking
- choking
- kicking
- burning
- shoving
- grabbing

primary victim means the person who has been abused.

province or provincial refers to the seven dioceses of the SEC as a province of the Anglican Communion.

racial abuse means abuse that is motivated by hostility or prejudice based on race.

respondent means a church worker against whom a complaint has been made.

safe church or safeguarding means policies and practices to promote the physical, emotional and spiritual wellbeing of all persons within the church, including children, young people and vulnerable adults.

safeguarding office means the staff of the General Synod Office with responsibility for safeguarding.

safeguarding officer means the Provincial Safeguarding Officer.

secondary victim means other people who have suffered harm as a result of the abuse of the primary victim. They will be likely to include members of their family of the primary victim as well as members of the family of the abuser, other church workers and members of the church.

sexual abuse occurs where a church worker engages in any of the following conduct:

- grooming
- image-based abuse
- sexual assault
- sexual exploitation
- sexual harassment
- viewing, possessing, producing or distributing images of child abuse also known as child pornography.

sexual assault occurs where a church worker engages in any intentional or reckless act, uses force or threatens to use force involving some form of sexual activity against a person without their consent, or with their consent in circumstances where consent is not a defence to such sexual activity under the applicable laws. Children who are under the age of consent, or any adult on their behalf, cannot consent to sexual activity. Sexual assault will normally constitute a criminal offence and includes:

- rape
- touching a person in a sexual manner
- inviting, inducing, inciting or forcing a child, young person or vulnerable adult to touch themselves, the church worker or another person in a sexual manner.

sexual exploitation occurs where a church worker, who has a ministry relationship with a person who is over the age of consent, invites them to engage in sexual activity, or engages in sexual activity with them with their consent. It does not matter that the person made the invitation or initiated the sexual activity.

sexual harassment occurs where a church worker makes an unwelcome sexual advance, or an unwelcome request for sexual favours, to a person. It may consist of a single incident or several incidents over a period of time, and may involve different forms of communication such as phone calls, email, text messages and social media. It includes:

- asking for sex
- making gestures, jokes or comments containing sexual references
- showing sexually explicit material

spiritual abuse occurs where a church worker mistreats a person by actions or threats when justified by appeal to God, faith or religion. It includes:

- using a position of spiritual authority to dominate or manipulate another person or group
- using a position of spiritual authority to seek inappropriate deference from others
- ostracising a person from their church community
- isolating a person from friends and family members
- using biblical or religious terminology to justify abuse

vulnerable adult means an adult who by reason of an intellectual disability, mental illness or other impairment, age or other circumstance, has reduced capacity, whether permanently or temporarily, to protect themselves from abuse. This includes any adult who:

- is ministered to in their home
- is dependent on one or more persons for support such as in the case of an accident, illness or birth of a child
- experiences a life crisis or natural disaster, such as the death of a family member, relationship breakdown or loss of employment, or loss of home and possessions
- through poverty, war or civil strife, displacement, ethnicity, sexual orientation or gender, or other social and cultural factors has a diminished ability to protect themselves from abuse

APPENDIX B

PVG Scheme Guidance

INTRODUCTION

The purpose of this document is to provide guidance on the Disclosure (Scotland) Act (2020) in the context of the many and varied roles involving working with children and vulnerable people in our congregations, so that the Scottish Episcopal Church (SEC) complies with the law, and the PVG Scheme is a proportionate but effective underpin to our safe recruitment policy and practice.

It is the responsibility of each employer or voluntary organisation to determine how to comply with the legislation, resulting in some definitions of regulated roles differing between organisations. This document defines regulated roles within the SEC governance framework and is intended only for the purposes of the SEC.

The full Disclosure Scotland guidance on changes to regulated roles can be downloaded from: <https://www.mygov.scot/pvg-scheme-regulated-roles-guidance>

HEADLINES

WHAT ARE THE REQUIREMENTS?

- PVG is a legal requirement for regulated roles from 1 July 2025. This means that all SEC Church Workers in regulated roles must complete their PVG application before their first day in the role. The PVG process is completed when the Lead Signatory has received a copy of an applicant's PVG Scheme Record from Disclosure Scotland and issued a notification of PVG status to the relevant PVG co-ordinator, Bishop or employer.
- Working under supervision prior to completion of PVG is not permitted.
- Regulated roles and activities replace regulated work. The guidance on regulated roles widens the requirement for PVG in specific areas. These include 16-18 year olds working under supervision with children, and some church personnel in roles that will bring them into contact with children or protected adults as a necessary part of their duties.
- Although the PVG guidance on charity trustees and positions of responsibility has changed, the SEC does not meet all the relevant criteria and vestry members are not required to have PVG membership.
- Disclosure Scotland has announced that 5-year PVG scheme membership will commence on 1 April 2026. Disclosure Scotland will transfer PVG Scheme members to 5-year membership between 2026 and 2031.

WHAT IS BEHIND THE HEADLINES?

WHAT IS THE LEGAL REQUIREMENT?

The SEC has always treated the PVG scheme membership as mandatory for people working with children and protected adults, but from 1 July 2025 it became a legal requirement with criminal sanctions both on the employer or voluntary organisation and the individual employee or volunteer.

Disclosure Scotland guidance:

An organisation could be considered to fall in scope of the offence provisions if it permitted an individual to carry out activities that would amount to a regulated role before first receiving a PVG Scheme Level 2 disclosure that confirms that the individual is a member of the PVG Scheme for that type of work. Performing activities that amount to a regulated role, even on a trial basis, would still mean that the individual was carrying out a regulated role.

In the SEC, each church body - vestry, diocese or employer - is responsible for appointments to regulated roles and has legal responsibility for arranging PVG scheme disclosures. It is the responsibility of the SEC Lead Signatory to advise whether or not a role requires PVG, and PVG applications are processed by the provincial Safeguarding Team.

Disclosure Scotland has authorised the SEC Lead Signatory to submit PVG applications for the roles described in this document. It is an offence under section 44 of the Disclosure (Scotland) Act 2020 to make unlawful requests for PVG scheme disclosures.

It continues to be an offence for an individual to do, or to seek or agree to do, a type of regulated role (with children, protected adults or both) from which the individual is barred.

WHAT IS A REGULATED ROLE?

The Disclosure (Scotland) Act (2020) defines certain types of work that are automatically designated as regulated roles. These include obvious categories such as doctors, social workers and teachers. There are no designated regulated roles that apply to the SEC so requirement for PVG is based on whether the activity is regulated.

Workers with children or protected adults will be in a regulated role if they are carrying out an **activity** on schedules 2 or 3 of the Disclosure (Scotland) Act (2020) **and** the role meets certain other conditions.

For the purposes of the Scottish Episcopal Church there are two relevant activities:

- providing religious activities or services for children (Schedule 2)
- providing religious activities or services for protected adults (Schedule 3)

WHO IS A CHILD?

A child is a young person under the age of 18.

WHAT DOES PROVIDING RELIGIOUS ACTIVITIES OR SERVICES FOR CHILDREN MEAN?

In the context of the SEC religious activities and services are teaching children, supervising children, providing spiritual guidance to children, and providing pastoral care to children.

WHO IS A PROTECTED ADULT?

A protected adult is anyone 18 or over who, by reason of physical or mental disability, illness, infirmity or ageing, and **either**

- (i) has an impaired ability to protect themselves from physical or psychological harm **or**
- (ii) requires assistance with the activities of daily living.

Disclosure Scotland guidance:

Disability, illness or infirmity can be either permanent or temporary in nature to fall within this definition.

If someone is disabled, ill, infirm or ageing, these characteristics are not sufficient in themselves to mean an individual is a protected adult. It must also be coupled with an impaired ability to protect themselves from physical or psychological harm or requires assistance with the activities of daily living.

It is likely that the decision about whether someone has an impairment will lie with the individual themselves, a family member or an agency with responsibility for the individual's care or welfare.

The definition and associated guidance does not enable identification of protected adults on a consistent basis. The guidance also makes reference to domestic abuse and homelessness, but there are many other forms of situational vulnerability. People who seek support from the church are all potentially vulnerable and some of them will be protected adults, either temporarily or permanently, therefore all involved in delivering spiritual guidance or pastoral care can reasonably anticipate providing support to protected adults.

WHAT DOES PROVIDING RELIGIOUS ACTIVITIES OR SERVICES FOR PROTECTED ADULTS MEAN?

In the context of the SEC religious activities and services are the provision of support, advice, spiritual guidance and pastoral care to protected adults.

WHAT OTHER CONDITIONS MUST BE MET FOR AN ACTIVITY TO BECOME A REGULATED ROLE?

There are additional requirements to 'providing religious activities' that determine whether an individual is in a regulated role for the SEC. These requirements are explained in greater detail below but in summary they are:

- (1) The individual is appointed to a role by a **church body**.
- (2) The individual carries out the activity as a **necessary part or normal duties** of the role.
- (3) The individual has **contact** (whether supervised or unsupervised) with children, protected adults, or both while carrying out the activity. The contact with children/protected adults must include at least one of:
 - physical contact with children or protected adults,
 - visual, written or verbal communication with children or protected adults,
 - exercising power or influence over children or protected adults.
- (4) The contact must be **more than incidental**.

(1) APPOINTMENT BY A CHURCH BODY

A church body is defined as a body within the Scottish Episcopal Church which has charitable status in its own right and which has the power to make appointments. *Canon 65 Section 2(a)*

Each body must implement guidance issued from time to time by or on behalf of the Safeguarding Committee on safe recruitment including submitting applications to the Provincial Safeguarding Officer for criminal record disclosures for all relevant positions. *Canon 65 Section 2(c)*

All PVG applications must be processed through the SEC Safeguarding Team, but responsibility for initiating PVG applications lies with each church body.

(2) NECESSARY OR NORMAL DUTIES

A normal duty is an activity or activities that an individual:

- is expected to do as a necessary part of their role on an ongoing basis
- may do as a small or a major part of a wider role
- may do frequently or infrequently
- can reasonably anticipate as being part of their role
- does not do on an *ad hoc* basis

It is good practice for church bodies to recruit, train and support people to carry out specific duties with children and/or protected adults rather than asking people to take on duties on a one-off basis.

Disclosure Scotland guidance:

The 'normal duties' of an individual's regulated role will vary from role to role. There does not need to be a particular frequency associated with undertaking the activity. For example, in some cases it might be a normal duty for an activity to happen once or twice per year because it is something that is reasonably anticipated as part of the role. In other cases, the activity might happen on a daily or weekly basis.

The normal duties can also be just one part of the individual's overall role. Normal duties do not need to make up the entirety of the individual's overall role for it to be a regulated role.

An activity is not likely to be a necessary part of a role when something is:

- an activity which is not part of the individual's normal role
- carried out in response to an emergency situation
- arranged at the last minute to stand in at short notice for sickness or other unexpected absence of another worker.

There is guidance on covering unexpected absence in the notes on regulated roles (below).

(3) CONTACT

The contact with children/protected adults must include at least one of:

- physical contact with children or protected adults,
- visual, written or verbal communication with children or protected adults,
- exercising power or influence over children or protected adults.

Clearly there are opportunities for contact with children and protected adults in many different church contexts, but contact or the opportunity for contact with children or protected adults does not automatically mean that someone is in a regulated role. Contact must be in the context of a formal role involving the delivery of religious services or activities for children or protected adults. In most cases this means teaching or supervising children, or providing support, advice or spiritual guidance to protected adults.

However, contact as a necessary part of delivering a service to children can, in some circumstances, also apply to other roles that do not involve teaching or supervising children, but where contact with children is necessary to the delivery of the activity. Further guidance is provided in the notes on regulated roles.

(4) INCIDENTAL CONTACT

Disclosure Scotland guidance:

An activity is likely to involve incidental contact when it is:

- *part of a service that is intended to be open to all, which could be indicated by the location of an event, where it's advertised and what the admission policy is*
- *attractive to a wide cross section of society*
- *not an activity involving contact with children or protected adults as usual part of the individual's role but either group are in the general vicinity when the individual is carrying out their role*

Conversely, contact is likely to be considered more than incidental when an activity:

- *is part of a service intended to be for children or protected adults,*
- *is positioned or presented to be more attractive to children or protected adults than others*

In order to determine whether contact is incidental it is necessary to draw a distinction between activities that are specifically for children or protected adults and those that are more general in nature and open to all.

For example, the presence of some protected adults at a lunch club that is open to anyone to attend would be incidental contact, but contact with a support group for dementia sufferers would be more than incidental. Volunteers at the lunch club would not require PVG; volunteers at the dementia support group would require PVG. The notes on regulated roles (see below) provide further guidance.

SUMMARY OF REGULATED ROLES IN THE SEC

(1) MINISTRY APPOINTMENTS

The following require a licence or authorisation from the diocesan bishop:

- **Clergy (including all forms of licence)**
PVG: children and adults
- **Lay Readers**
PVG: children and adults
- **Lay Leaders**
 - Lay Worship Leaders taking services in the absence of a priest using the reserved sacrament
PVG: children and adults
 - Lay Worship Leaders taking services of the Word (no Holy Communion) in the absence of a priest
PVG: children and adults
 - Lay Eucharistic Ministers taking Holy Communion to the housebound come under the category of pastoral care worker
PVG: protected adults
 - Lay Eucharistic Ministers who assist with the distribution of the elements where a priest is presiding
PVG: not required

(2) VESTRY APPOINTMENTS

- Children's Ministry
PVG: children
- *Activities involving children and adults*
 - Altar Servers with responsibility for training and supervising child servers
PVG: children
 - Altar servers with no responsibility for child servers
PVG: not required
 - Church Musicians with responsibility for teaching or supervising children
PVG: children
 - Church Musicians with opportunity for contact but no responsibility for teaching or supervising children
PVG: requirement determined on case-by-case basis
 - Bell Ringers with responsibility for teaching or supervising children
PVG: children

Altar servers carry out a range of tasks before, during and after a service. The role does not include distribution of the chalice (see Lay Leaders above).

A Sacristan does not require PVG as contact with children will be incidental.

- Family activities
PVG: children
- Pastoral Care Workers
PVG: protected adults
- Activities for protected adults
PVG: protected adults
- Community activities
PVG: requirement determined on a case-by-case basis
- Church Management
 - Charity Trustees
PVG: not required
 - Employer responsibilities
PVG: required for specific employer responsibilities
 - PVG Co-ordinators
PVG: not required
 - Church Personnel
PVG: requirement determined on case-by-case basis
 - Church Counsellors
PVG: children and adults

NOTES ON REGULATED ROLES

(1) CLERGY AND LAY LEADERS

All Clergy and Lay Readers require to be members of the PVG Scheme for children and protected adults.

Lay Worship Leaders who lead worship in the absence of a priest require PVG for children and protected adults. Eucharistic ministers require PVG for protected adults only if they are taking Holy Communion to people at home, and not for assisting with distribution of the elements in Church.

Visiting Clergy

This section applies to clergy from churches listed in Schedule 1 and Schedule 2 of Canon 15.

The requirement for all such clergy is that they must be in good standing with their own Church and authorised in their own Church to undertake the responsibilities which they are being asked to exercise within the Scottish Episcopal Church.

Clergy from Churches listed under the schedules who officiate on a one-off or occasional basis do not require PVG.

Clergy from Churches listed under the schedules who are involved in pastoral ministry, or who take services on a regular basis must apply for PVG.

Canon 15 Section 8d: No Cleric from another diocese or another Church shall officiate in any diocese of the Scottish Episcopal Church for more than five Sundays in any one year without permission in writing under the hand of the Bishop of the diocese in terms of Appendix No.17 [Permission to Officiate].

Clergy from churches listed under Canon 15 who officiate for more than five Sundays in any one year require Permission to Officiate from the Bishop of the diocese and are required submit a PVG scheme application through the Scottish Episcopal Church.

Ministry in Schools

SEC clergy may be invited to take part in school assemblies and other activities. Some schools ask visiting clergy to obtain a PVG check through the school or local authority, or provide evidence of their PVG status. Disclosure Scotland has advised that schools are not permitted to carry out PVG checks on visiting clergy.

When activities facilitated by a school are provided by another organisation, for example, a religious organisation helping students explore their faith or breakfast groups for school pupils, this activity is arranged and provided by the religious organisation. As such, the religious organisation is required to ensure that the volunteer/employee makes a PVG scheme application and is therefore appropriately checked, and that the group has received a PVG scheme disclosure before the individual begins their regulated role.

Because the religious organisation are assessing their suitability for a regulated role (not the school or local authority), no other organisation or individuals outside that religious group are allowed to request PVG scheme disclosures for the individual in respect of their role for the group, or make it a requirement that the volunteer/employee provide a copy of their PVG scheme disclosure.

Disclosure Scotland guidance issued January 2026

A copy of the full guidance note is available on request from the PVG Team

(2) ACTIVITIES FOR CHILDREN

Examples: Sunday School, Youth Group and other activities where children attend without parental supervision.

All leaders over the age of 16 require PVG scheme disclosure for work with children before the date of commencement of their role, including any trial period or supervised training.

It is SEC policy to allow 16–18 year olds to assist with children’s activities under supervision. Under the previous legislation this did not require PVG. From 1 July 2025 16-18 year olds who assist with children’s activities under supervision will require PVG because of their contact with children as a necessary part of their role.

It remains SEC policy not to appoint young people under the age of 18 to full leadership responsibilities. Assistants under the age of 18 should be supervised and not counted towards leader/child ratios.

Ratios – NSPCC Guidelines

- **under 2 years - one adult to three children**
- **2 - 3 years - one adult to four children**
- **4 - 8 years - one adult to six children**
- **9 - 12 years - one adult to eight children**
- **13 - 18 years - one adult to ten children**

Depending on the needs and abilities of the children, and the nature of the activity, it may be advisable to have more adults than the minimum. There should always be at least two adults present, regardless of the size of the group.

A parent who remains with a child to help them settle does not require PVG and does not count towards adult to child ratios.

EMERGENCY COVER

A need for extra leaders can arise if regular leaders are absent at short notice, or if more children than anticipated attend a group. In these circumstances it is permitted to ask someone who does not have PVG for the SEC to help out at short notice to maintain ratios of adults to children.

However, anyone on a formal rota for providing occasional cover requires PVG for the SEC because it meets the definition of normal duties, even if someone is only helping out once or twice a year.

Those responsible for arranging children's activities should consider whether to rely on emergency cover or have a pool of people who are PVG checked and available at short notice.

(3) ACTIVITIES INVOLVING CHILDREN AND ADULTS

Examples: where children participate in church services as choir members, altar servers or bell ringers.

Under the previous legislation, adult members of church choirs were excluded from applying for PVG because they did not have responsibility for teaching or supervising the children, even though their presence was essential to the delivery of the activity for children. The new requirement to consider whether there is contact that is more than incidental and necessary to the delivery of the activity brings this area of work within the scope of PVG. Disclosure Scotland has confirmed that in most of these situations contact with children is considered incidental, so in most cases there is no requirement to check all adult choir members, servers or bell ringers. PVG is required for anyone involved in teaching or supervising children. It may be necessary to appoint chaperones depending on the activity and the number of children involved. To ensure a consistent approach PVG requirement for such roles will be assessed on a case-by-case basis by the Lead Signatory. Please seek advice on whether PVG is required before initiating PVG checks.

(4) FAMILY ACTIVITIES

Examples: Messy Church, Parent and Toddler Group

Whilst these are not activities exclusively for children, the presence of children is integral to the activity, and the activities are directed at or inclusive of children. Whilst children are accompanied, leaders have the opportunity for both supervised and unsupervised contact with children as a necessary part of their role.

All leaders require PVG scheme disclosure for work with children before the date of commencement of their role, including any trial period or supervised training.

Adults attending with children in their charge do not require PVG.

(5) PASTORAL CARE WORKERS

This includes visiting people in their own home, residential care home or hospital, or providing pastoral support in other settings. It also includes spiritual directors.

All pastoral visitors, pastoral support workers and spiritual directors require PVG scheme disclosure for work with protected adults before the date of commencement of their role, including any trial period or supervised training.

(6) ACTIVITIES FOR PROTECTED ADULTS

Example: Dementia Support Group

Leaders delivering activities providing support specifically for protected adults are considered to be pastoral care workers and require PVG scheme disclosure because the contact with protected adults is more than incidental. Whilst some congregations have groups for protected adults, most church groups come under the category of community support groups.

(7) COMMUNITY SUPPORT GROUPS

Examples: Warm space, Food banks, Drop-in centres, Outreach projects, Community meals (either on church premises or delivered to people's homes)

These activities are not specifically aimed at protected adults, and in many cases the purpose of the activity is social rather than to provide pastoral care. This takes the activity out of the scope of PVG, so not all volunteers and employees will require PVG.

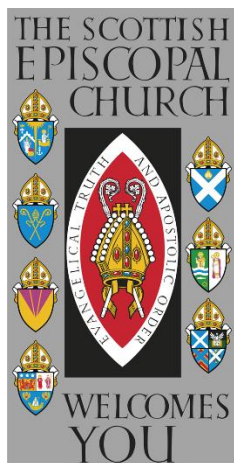
However, many church activities are attended by vulnerable people who are looking for support from the church. Volunteers who assist with food preparation, delivery of food to people at home, or providing general fellowship over a cup of tea at a gathering on church premises should not be expected to respond to people with complex needs if they do not have experience in this area. They should be given basic training and advice on how to direct people to appropriate support when pastoral concerns arise. This work does not require PVG.

To ensure that support and advice are available if needed, and volunteers are not alone when responding to difficult situations, it is recommended that at least one member of clergy or pastoral care worker who has training and experience should attend community support groups.

(8) CHURCH MANAGEMENT

CHARITY TRUSTEES

The PVG guidance contains a four-part test for determining whether the charity trustees of an organisation require PVG Scheme membership. The key question for the SEC is whether one of the organisation's main **purposes** is the provision of benefits to children and protected adults. The Safeguarding Team has taken legal advice on the distinction between **purposes** and **activities**.



Each of our churches is a place of **welcome for all**; an inclusive community of all ages and abilities that gathers together for worship, fellowship and ministry. This is our **purpose**.

The church's ministry is expressed in many different ways, some of which are **activities** specifically intended for children or protected adults, and others which are open to the general public.

Charity trustees in the SEC are responsible for providing **activities** for children and protected adults, but the main **purpose** of the church is the advancement of religion and to provide public benefit.

The SEC constituent charities do not fall into the category of an organisation whose main **purpose** is to provide benefits for or to children and/or protected adults. Therefore, SEC charity trustees are not required to be members of the PVG Scheme **unless** they are also appointed to other roles that involve work with children and/or protected adults that requires PVG membership.

EMPLOYER RESPONSIBILITIES

Each SEC church body with charitable status has specific responsibilities for PVG and Safeguarding. Each church body holds collective responsibility for the management of staff and volunteers.

The role of Church Manager includes people who have specific responsibilities for managing church workers (1) or managing church premises (2). Disclosure Scotland has advised that some Church Managers will require PVG, others will not.

Disclosure Scotland guidance:

An individual is also carrying out a regulated role if they are a [day-to-day supervisor or line manager](#) of someone doing the activities mentioned in Part 2 of schedules 2 and 3 of the PVG Act. This is the case even if the supervisor or manager does not carry out the activity themselves.

Whilst a church body has collective responsibility for staff and volunteers, PVG is only required for individuals who have day-to-day responsibility for managing people in regulated roles.

Disclosure Scotland guidance:

Collective responsibility for a policy, process or organisation does not necessarily mean collective responsibility for day-to-day supervision or management of an organisation's employees.

For example, a committee might have collective responsibility for a church youth group.

However, it is unlikely that each church committee member will have responsibility for the day-to-day supervision or management of any youth worker who is carrying out the regulated role. Experience tells us that it is likely one person will have specific management or supervision responsibility for the youth worker(s) and that only one of the church committee is doing a regulated role due to the supervision aspect. Other committee members may be carrying out a regulated role for other reasons out with the supervision or line management.

CHURCH MANAGERS (1)

In most congregations and dioceses, the day-to-day responsibility for workers in regulated roles is managed by the Bishop for clergy and lay licences and the Rector or Priest-in-Charge for volunteers and staff.

However, some larger congregations may have more than one person with responsibility for managing staff and volunteers. A **church manager** is in a regulated role if they are responsible for:

- recruitment
- training
- supervision
- support and welfare
- disciplinary issues

The requirement for PVG for church managers who are not already PVG members because of their role as bishop or rector will depend on the role and the duties involved. To ensure a consistent approach PVG requirement for such roles will be assessed on a case-by-case basis by the Lead Signatory. Please seek advice from the SEC PVG team as to whether PVG is required before initiating PVG checks.

CHURCH MANAGERS (2)

PVG may be required for employees or volunteers who have responsibility for church premises, where contact with children or protected adults is a necessary part of their role, and the contact is more than incidental. The role could include:

- being on duty in a church building during activities for children or protected adults and where there is opportunity for contact.
- being the primary point of contact in a church that is regularly open to the public and it can be reasonably anticipated that the role will involve responding to vulnerable people.

PVG is not required in situations where contact with children or protected adults is incidental:

- general welcoming duties for church services
- general caretaking duties
- cleaning and maintenance staff
- responding to an emergency situation

The requirement for PVG will depend on the role, the duties involved and whether contact is more than incidental. To ensure a consistent approach PVG requirement for such roles will be assessed on

a case-by-case basis by the Lead Signatory. Please seek advice from the SEC PVG team as to whether PVG is required before initiating PVG checks.

PVG CO-ORDINATORS

PVG co-ordinators do not require PVG as the role does not involve the delivery of activities for children or protected adults or employer responsibilities. PVG co-ordinators may hold other roles that require PVG.

CHURCH COUNSELLORS

This refers to the small number of SEC churches which provide a counselling service that operates separately from pastoral care arrangements. Counsellors require PVG for working with children and protected adults.

WHAT WILL HAPPEN WHEN 5-YEAR MEMBERSHIP COMMENCES ON 1 APRIL 2026?

Disclosure Scotland has confirmed that from 1 April 2026 lifetime membership of the PVG scheme will end. People who joined the PVG scheme prior to 1 April 2026 will be transferred to 5-year membership between 1 April 2026 and 1 April 2031.

PVG scheme disclosures for routine applications issued after 1 April 2026 will automatically move existing PVG members to 5-year membership. However, Disclosure Scotland guidance states that organisations should NOT submit PVG applications for the sole purpose of transferring to 5-year membership.

PVG scheme members will be enrolled in or transferred to the new scheme by one of three processes. From the SEC perspective these are:

(1) PVG applications for new SEC appointments

From 1 April 2026 all new applicants for PVG disclosure will be enrolled in the 5-year scheme. This will cover all new appointments in the SEC.

(2) PVG applications by other employers

Some existing PVG members on the SEC workforce will move to 5-year membership because they also work in a profession such as teaching or social work that has a requirement for regular PVG updates, or because of starting a new regulated role with a different employer or voluntary organisation. We do not know how many of our volunteers have a PVG registration with more than one employer or voluntary organisation, but it is anticipated that significant numbers will transfer to 5-year membership in this way.

(3) Transfer Process operated by Disclosure Scotland

From April 2026-2031 Disclosure Scotland will operate a transfer process to ensure that any PVG members who do not fall into either of the above categories are moved to 5-year membership no later than April 2031. Disclosure Scotland will notify PVG members when they are required to complete the transfer process.

At this time there is limited information about how the transfer process will work other than it will not be the same as the application process, and it will be managed by Disclosure Scotland. There will be online and offline versions of the transfer process.

We understand that Disclosure Scotland will notify individuals and the employer (SEC PVG Team) when to start the transfer process. Individuals will have 3 months in which to complete the transfer. We will work with PVG co-ordinators to facilitate this process.

Disclosure Scotland has confirmed that no fee will be payable for transfer to 5-year membership. Applications for routine PVG scheme disclosures will remain free for volunteers, with fees only payable for paid employment.

Over the next five years all PVG members will be transferred to 5-year membership by one of the above processes.

From 1 April 2026 PVG results issued to individuals and employers will give the date on which the individual will require to renew their PVG membership. The same renewal date will apply to all organisations for which an individual works or volunteers.

CONTACT DETAILS

SAFEGUARDING ADVICE

To be notified

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