



The Church of Scotland

Guide to Regulated Roles

November 2025

Version	Date	Document Owner	Details/Changes
1	Nov 2025	Deborah Blackhurst	New guidance developed and agreed with Disclosure Scotland's Policy & Engagement Manager
2	Dec 2025	Deborah Blackhurst	Support worker for adults with cognitive impairment added.

Introduction

The Disclosure (Scotland) Act 2020 made provision for amendments to the Protection of Vulnerable Groups (Scotland) Act 2006 which, in turn, brought about significant changes to the Protection of Vulnerable Group Scheme (PVG). While Royal Assent for the new Act was gained 2020, the legislation is being implemented in stages. In April 2025, the change from 'Regulated Work' to 'Regulated Roles' has seen the inclusion of more people within the Scheme.

At this time, membership for those undertaking regulated roles also became mandatory. While the Church of Scotland has implemented PVG on a mandatory basis for some time, the change in legislation has introduced two new criminal offences. It is now a criminal offence to 'employ' someone in a Regulated Role without PVG scheme membership. It is also a criminal offence for an individual to undertake a Regulated Role without PVG Scheme membership.

Understandably, the prospect of committing a criminal offence brings additional anxiety as we strive to ensure compliance with the legislation and promote a safe Church for all. The Safeguarding Service has listened to our Congregational and Presbytery Safeguarding Volunteers and others who have made contact to seek advice on what is or isn't a 'Regulated Role'. This guidance is informed by these interactions.

Determination of Regulated Roles

The following guide provides comprehensive information regarding the key roles within the Church of Scotland alongside a brief rationale regarding their status as Regulated Roles or Non-Regulated Roles. The assessment of these roles was undertaken in partnership with Disclosure Scotland who have endorsed these decisions.

Contradictory Advice and Legal Accountability

It is important to recognise that situations which may appear similar can, in reality, have important differences. The guidance of the Safeguarding Service is based on information specific to the Church of Scotland which has been endorsed by Disclosure Scotland. As well as promoting the safety and wellbeing of vulnerable groups engaging in our churches, following the instruction of the Safeguarding Service ensures that we have a level of protection should there be any awful incident where the status of a role could be a contributing factor. Following contradictory advice from another source undermines this protection.

Contradictory Advice from Disclosure Scotland

Contacting Disclosure Scotland directly may feel like a safe option. It is fair to assume that they will provide advice that is accurate and compliant with the legislation. However, it is important to understand that call handlers are providing advice based on what they understand of the information you provide. Their advice is not tested against specific Church of Scotland information and has not undergone the same level of scrutiny as that included within this guidance.

Authority of the General Assembly

The Safeguarding Service operates with the authority of the General Assembly. The General Assembly has delegated responsibility for Safeguarding to the Safeguarding Service via the Safeguarding Committee. This is done with confidence that the Safeguarding Service is staffed by individuals with the relevant professional qualifications, skills, abilities and experience to make defensible decisions

regarding Safeguarding matters. The Head of Safeguarding fulfils the role of National Advisor to the Church of Scotland's General Assembly. The General Assembly has faith in the decision-making capacity of the Safeguarding Service which is demonstrated within the Safeguarding Act (ACT XVI 2025) section 16 (8) which states:

'Advice given by the Safeguarding Service, when framed as an instruction, must be followed by all Employing Agencies and by all Presbyteries, Kirk Sessions, Safeguarding Coordinators, office-holders, staff and volunteers involved in work with Vulnerable Groups.'

Working Together to promote a safe Church for all.

Everyone engaged in the life and work of the Church has a role to play in promoting the wellbeing and safety of vulnerable groups. The Safeguarding Service welcomes challenge in relation to our decision making, processes, guidance and any other aspect of Safeguarding. It is important that we are accountable. The Safeguarding Team will always listen to the views, opinions and experiences of others. We recognise that we can learn from others and provide better support as a result of this learning.

We ask others to respect the professionalism of the Safeguarding Team, particularly in regard to issues of legal compliance. This is our area of expertise and you can be assured that, before advice is issued, we will have fully explored all aspects of the relevant legislation and used this to inform our advice.

It is also prudent to acknowledge the role of governance structures of the Church in ensuring accountability through the scrutiny of reports and direct engagement of the Head of Safeguarding within governance meetings. Primarily, the Safeguarding Committee provide robust and comprehensive oversight of the work of the Safeguarding Service; however, oversight also includes being available to answer questions and justify operational decisions at meetings of the Assembly Trustees or any other governance forum.

Regulated Roles

The following tables provide details of roles within the Church across four categories:

1. Roles with children
2. Role with 'protected adults' as defined in the Disclosure (Scotland) Act 2020
3. Roles with children and protected adults
4. Roles outwith congregations

In considering which roles are Regulated Roles, it is important to understand that assessments are carried out within the context of the sole aim of the Church of Scotland as per OSCR registration: the advancement of religion.

If the role you are considering is not included below, please contact the Safeguarding Service directly.

Human Resources Department should contact the Safeguarding Service when job descriptions are being developed to ensure an accurate assessment of individual roles.

Training Requirements: A person must attend the training required for ALL roles the undertake.

Children's Role /Opportunity	Regulated Role?	Training Required	Rationale confirmed by Disclosure Scotland in respect of Disclosure (Scotland) Act 2020, (the 'Act')
<p>Congregational Children's or Youth worker: Being in charge of or caring for children and providing religious activities or services for them</p> <p><i>NB Inclusion of adults with learning disabilities in children's activities is not appropriate. It does not meet the needs of either the children or the adult. See 'Adult Support Worker in the Adult section below for further advice.</i></p>	YES	Intro	This role includes undertaking an activity as defined in the Act, Schedule 3, Sections 1 & 21 of the Act Children: 0 – 12 years Youth: 13 – 18 years
<p>Church Officer/ Caretaker in a Church where a Nursery registered with the Care Inspectorate use the church halls and the Church Officer/Caretaker has responsibility for the areas used by the Nursery</p>	YES	Intro	Having a registered nursery within the Church Halls means the Caretaker is providing a domestic service within a setting. The Act, Schedule 3, part 2, section 20.
<p>Church Officer/ Caretaker in a Church where a Nursery registered with the Care Inspectorate use church halls; however, these halls are self-contained; not accessible directly from the Church and have separate access, and the Church Officer/Caretaker is not responsible for this area during the operational times of the Nursery.</p>	NO	NO	The nursery is self-contained, and the worker has no responsibility for this area during operational times. Should there be any maintenance issues which must be address during operational hours, the Church Officer/Caretaker should be accompanied and supervised by a member of the Nursery staff. The Act, Schedule 3, section 1(2)(b)(i).

<p>Messy Church/ Parent & Toddler Volunteer: Children under 5 attending with their parent/carer. No unsupervised contact. Volunteers set up play areas and interact generally with the parents and their children. They have a story time when one of the volunteers reads a story to children (with their parents) who want to join. Volunteers set out biscuits and juice for children. Tea/Coffee for parents. Purpose of the group –</p> <ul style="list-style-type: none"> - provision of opportunities for families to enjoy play together - reduce isolation of parents with young children <p>*Although there is not requirement for training, the Safeguarding Pocket Guide could be issued.</p>	NO	NO*	<p>This is an opportunity for families and not targeted at children, therefore, it is not a Regulated Role</p> <p>Parents/carers remain responsible for their children at all times.</p> <p>The Act, Schedule 3, section 1(2)(b).</p> <hr/> <p>Messy Church’s recommendation regarding Enhanced DBS Checks is NOT relevant in Scotland.</p> <p>The Messy Church Organisation provide information on their website which states “We recommend that at a minimum, your core team have enhanced DBS checks.”</p> <p>It is important to understand that an Enhanced DBS check is NOT equivalent to PVG Scheme membership. PVG is a live system and DBS is not. The checks are covered by different Laws and the law of the country in which the role is being undertaken must be adhered to.</p> <p>Disclosure Scotland has confirmed that being a Messy Church leader/helper is NOT a regulated role which, in turn, means to apply for a PVG Scheme membership for this role would be a criminal offence.</p> <p>If your Kirk Session decide that Messy Church roles are positions of trust or leadership, the Level 1 Disclosure can be applied for.</p>
<p>Musician working with children: Being in charge of or caring for children and providing religious activities or services for them</p>	YES	Intro	<p>This role includes undertaking an activity as defined in the Act, Schedule 3, sections 1 & 21</p>
<p>Santa – handing out presents to children who are accompanied at all times by a parent/carer or volunteer/worker who has PVG Scheme membership.</p>	No	NO	<p>This is not a regulated role as defined by the ‘Act’.</p>

Making a jovial entrance and greeting children and parents is at the discretion of the individual.			It is a specific event/one off activity and Santa does not have the opportunity for unsupervised contact with children. The Act, Schedule 3, section 1(2)(b).
School – Adults going into schools on behalf of the Church to facilitate children’s activities	YES*	Intro	All workers providing children’s activities on behalf of the Church must have PVG Scheme membership. It is not necessary to have an additional application to work in schools* *We are aware that some Head Teachers may request that our workers undergo an update PVG through the school. DS has confirmed that this is not necessary; therefore, should such a request be received, please provide the details for the Safeguarding Service and ask that they contact us directly. The Act, Schedule 3, sections 1 & 21
Sunday Worship Service – Volunteer providing the children’s address or other activities within the Sanctuary as part of the service	NO	NO	This Service is open to the public and the children’s address is part of the regular Worship Service. Schedule 3, Section 1(2)(a)(i)

Protected Adults' Role /Opportunity	Regulated Role?	Training required	Rationale confirmed by Disclosure Scotland in respect of Disclosure (Scotland) Act 2020, (the 'Act')
<p>Adult Support Worker – any activity or group targeted at adults who have learning disabilities or cognitive impairment which results in them functioning with the capacity of a child, in situations where they are not accompanied by a carer.</p> <p><i>NB- it is not appropriate for adults with cognitive impairment to join with the activities of the Sunday School. While the activities may be developmentally appropriate for both the children and the adult, their needs are quite different, and each should be respected in their own right.</i></p> <p><i>It may be appropriate for the adult to be in the same room as the Sunday School; however, they should have a Support Worker with them who has the appropriate PVG Scheme membership.</i></p>	YES	Intro	This role includes undertaking an activity as defined in the Act, Schedule 4, Sections 1 & 21 of the Act
<p>Care Home for Older People – Worship Service. Activity – preaching, readings, leading hymns/music</p>	YES	Intro	Church representatives are providing a religious service or activity to protected adults through preaching, prayer, hymns. The Act, Schedule 4, sections 1 & 21.
<p>Care Home for Older People – Worship Service. Volunteers – providing Christian Fellowship by participating in the worship service alongside residents. General interaction and encouragement of participation; may also provide support with simple tasks such as finding the place of a reading within bible/ hymnary</p>	YES	Pocket Guide	Church representatives are providing a religious service or activity to protected adults by modelling and encouraging participation, providing fellowship through general interactions and building relationships. The Act, Schedule 4, sections 1 & 21.
<p>Christmas Choir – Attending Care Homes for older people to provide a Christmas Concert/Sing-along.</p>	NO	NO	This is not a regulated role as defined by the 'Act' despite it being carried out in a Care Home. It is a specific event/one off activity, and in such circumstances, contact must be 'unsupervised' to meet the criteria for a regulated role as per Schedule 4.

Members of staff from the Care Home must be present at all times.			
Delivering flowers/newsletter to a Care Home for Older People. The volunteer may be offered to come in for a cup of tea (must be in a communal area and must be supervised by staff).	NO	NO	This is not an activity included in The Act, Schedule 4
Delivering flowers/newsletter to the home of a church member who may be a protected adult. The volunteer may be offered to come in for a cup of tea.	NO	NO	Church flowers are delivered to individuals for a range of reasons and not based on the person's vulnerability. Contact with protected adults would be incidental. The Act, Section 75 & Schedule 4
Dementia Choir – in church halls: A choir of volunteers provide a participative 'concert'. The choir sing and the attendee are given song sheets with the word to let them sing along should they wish. Attendees include: <ul style="list-style-type: none"> - adults with dementia who have the capacity to engage in any community activity/service without support - adults with dementia who required support to ensure their safety and care needs 	NO	NO	Attendees who are independent and able to meet their own needs are not 'protected adults' despite a dementia diagnosis. The Act, Schedule 4, section 2 Attendees who are not able to meet their own needs are accompanied by a carer who is responsible for the protected adult at all times. Choir members/ volunteers do not provide any care or have unsupervised contact. Schedule 4, sections 1, 3 & 21
Elder - nursing home visiting	YES	Intro Trustee	Elders visiting nursing homes are undertaking an activity as defined in the Act, Schedule 4, sections 1 & 21.
Pastoral Care Worker – where the Pastoral Care Team have specific responsibility for targeting protected adults	YES	Intro	Pastoral Care Teams visits are targeted at those who are vulnerable and are undertaking an activity as defined in the Act, Schedule 4, Sections 1 & 21

<p>Sheltered Housing for vulnerable adults- Worship Service specifically for residents in a communal area. Activity – preaching, readings, leading hymns/music</p>	YES	Intro	Church representatives are providing a religious service or activity to protected adults through preaching, prayer, hymns. The Act, Schedule 4, sections 1 & 21.
<p>Sheltered Housing for vulnerable adults- Worship Service specifically for residents in a communal area. Volunteers – providing Christian Fellowship by participating in the worship service alongside residents. General interaction and encouragement of participation; may also provide support with simple tasks such as finding the place of a reading within bible/ hymnary</p>	YES	Pocket Guide	Church representatives are providing a religious service or activity to protected adults by modelling and encouraging participation, providing fellowship through general interactions and building relationships. The Act, Schedule 4, sections 1 & 21.

Children or Protected Adults' Role /Opportunity	Regulated Role?	Training required	Rationale confirmed by Disclosure Scotland in respect of Disclosure (Scotland) Act 2020, (the 'Act')
Choir Master/Musician – Choir is open to anyone	NO	NO	Contact with children or vulnerable adults in incidental. The Act, Schedules 3, & 4, section 1 (2)(b)(i)
Elders/ Trustees Includes home visiting that is NOT targeted at children or protected adults and supported accommodation (including Sheltered Housing) where adults maintain independence.	NO	Trustee	Elder: This general Elder role does not target children or vulnerable adults. While the Elder may come into contact with children or vulnerable adults during the course of their work, this is incidental. Trustee: Does not meet the criteria for Trustee PVG Scheme memberships for the following reasons: <ol style="list-style-type: none"> 1. The Church of Scotland has one single aim of 'advancement of religion'. While children and vulnerable adults benefit from our work, this is due to our commitment to our sole aim. 2. As part of the Kirk Session and/or Congregational Board, this Trustee does not exercise power or influence over children or protected adults as they do not make strategic or operational decisions that impact or these vulnerable groups. Such decisions are the responsibility of the Safeguarding Service as the General Assembly appointed department for this function.
Food/ Clothing Bank volunteer	NO	NO	The is not a Service targeting towards 'protected adults.' While some people using the service will be vulnerable this does not mean they are 'protected adults' as defined by the legislation. The Act Section 75 & Schedule 3, Section 1(2)(a)(i)

Hall lets: Groups using the Church through hall let agreements	NO*	NO	*The Kirk Session is not responsible for Groups using the hall. It is for those running these groups to comply with the legislation. We do not need to check their PVG status.
Interim Moderator 1 Undertaking the Pastoral Care duties of a Minister of Work & Sacrament	YES	As per the Ministries Learning Pathway	This role includes undertaking an activity as defined in the Act, Schedule 3 & 4, Sections 1 & 21: Providing religious activities or services for children and/or protected adults
Interim Moderator 2 Responsibility for line management of Locum	YES		This role includes undertaking an activity as defined in the Act' Schedules 3 & 4, section 1 (3)(a) A role, the normal duties of which include the day-to-day supervision or management of an individual carrying out a regulated role
Interim Moderator 3 No responsibility for Pastoral Care or line management of a Locum	NO		Contact with children or vulnerable adults in incidental. The Act, Schedule 3 & 4, section 1 (2)(b)(i)
Minister of Word and Sacrament & all Ministries Roles	YES		This role includes undertaking an activity as defined in the Act, Schedules 3, & 4, Sections 1 & 21: Providing religious activities or services for children and/or protected adults
Organist	NO	NO	Contact with children or vulnerable adults in incidental. The Act, Schedules 3, & 4 section 1 (2)(b)(i)
Pastoral Care Worker – where the Pastoral Care Team have specific responsibility for targeting protected adults	YES	Intro	Pastoral Care Teams visits are targeted at those who are vulnerable and are undertaking an activity as defined in the Act, Schedule 4, Sections 1 & 21
Prayer Groups – held in church	NO	NO	This activity is open to all. Contact with protected adults would be incidental. Schedule 4, Section 1(2)(a)(i)
Readers/ Worship Leader 1 –within church only	NO	NO	Contact with children or vulnerable adults in incidental. The Act, Schedule 3 & 4, section 1 (2)(b)(i)
Readers/ Worship Leader 2 – within church worship services and undertaking pastoral care	YES	Intro	This role includes undertaking an activity as defined in the Act, Schedules 3 & 4, sections 1 & 21: Providing religious activities or services for children and/or protected adults

Readers/ Worship Leader 3 – Within church worship services and within hospitals or care homes	YES	Intro	This role includes undertaking an activity as defined in the Act, Schedules 3 & 4, sections 1 & 21: Providing religious activities or services for children and/or protected adults
Safeguarding Coordinator	YES	Introduction & Advanced	The Safeguarding Team undertake activities as per the Act, Schedules 3, sections 1 & 4: Having the ability to directly influence decisions about safety and welfare. Schedule 4, sections 1 & 3: Having contact with protected which includes exercising power and influence.
Safeguarding Panel member	YES		The Safeguarding Team undertake activities as per the Act, Schedules 3, sections 1 & 4: Having the ability to directly influence decisions about safety and welfare. Schedule 4, sections 1 & 3: Having contact with protected which includes exercising power and influence.
Warm Spaces initiative: Providing a place where people can keep warm – recognising the financial impact of cost of living/heating and lighting homes. No specific activities provided, but in many cases, volunteers will have board games that people can engage with and some reading material. WiFi may also be provided to enable people to work/study from these spaces. School pupils (approx. 14 years +) are welcome to use the space independently; younger children must be accompanied by an adult. Some warm space initiative also provides hot drinks and food.	NO	NO	This is a service open to all within the local community. While we recognise that such services may attract people who are experiencing hardship, this does not equate to being a ‘protected adult’. Young people aged 14+ are accessing the service as a general community resource as this service is not targeted at them. Parents/carers of younger children remain responsible for their children at all times. The Act, Section 75 & Schedule 3, section 1 (2)(b)(i)

- Those in non-congregational roles should follow the appropriate Safeguarding Learning Pathway

Non-congregational Roles	Is this a Regulated Role?	Rationale confirmed by Disclosure Scotland in respect of Disclosure (Scotland) Act 2020, (the 'Act')
Assembly Trustees/ General Trustees	No	Trustee: Does not meet the criteria for Trustee PVG Scheme memberships for the following reasons: <ol style="list-style-type: none"> The Church of Scotland has one single aim of 'advancement of religion'. While children and vulnerable adults benefit from our work, this is due to our commitment to our sole aim. As an Assembly/General Trustee this role does not exercise power or influence over children or protected adults as they do not make strategic or operational decisions that impact or these vulnerable groups. Such decisions are the responsibility of the Safeguarding Service as the General Assembly appointed department for this function.
Line Managers of those in regulated roles	YES	This role includes undertaking an activity as defined in Schedules 3 & 4, section 1 (3)(a) A role, the normal duties of which include the day-to-day supervision or management of an individual carrying out a regulated role
Presbytery Clerk	NO	The duties of the Presbytery Clerk do not include any work that is targeted towards children or vulnerable adults. The Clerk does not have line management responsibilities for any individual undertaking a Regulated Role. While the Clerk has responsibility to ensure the implementation of the General Assembly's Discipline Act, this is an administrative function, and any Discipline investigation and decision making is managed via the Presbytery/Law Department. If the Clerk is undertaking any other role they should check if PVG Scheme membership is required in respect of that role.
Principal Clerk		

Safeguarding Trainer		NO	Although the training they provide is targeted at those working with children and vulnerable adults, the duties of the Safeguarding Trainer do not include any work with children or vulnerable adults.
Presbytery Safeguarding Contact		NO	The duties of the Presbytery Safeguarding Contact do not include any work that is targeted towards children or vulnerable adults.
Safeguarding Team	Safeguarding Officers	YES	The Safeguarding Team undertake activities as per the Act, Schedule 3, sections 1 & 4: Having the ability to directly influence decisions about safety and welfare: Having the ability to directly influence the operational delivery of education services for children and; Schedule 4, sections 1, 3 & 18 Having the ability to directly influence the operational delivery of medical or care services for protected adults
	Safeguarding Service Manager		
	Head of Safeguarding		