Advice on DBS checks for PCC members:

The Diocese of London Safeguarding Team wish to provide advice to parishes when considering if they should complete DBS checks for PCC members.

All Church of England parishes are charities and PCC members are therefore charity trustees. Accordingly PCCs have to consider the Charity Commission advice, summary of which is set out below:

i) The Charity Commission recommends that trustees always obtain a DBS (Disclosure and Barring Service) check when eligible* to do so as it is an important tool in ensuring that the person is suitable to act as a trustee.

ii) Any charitable organisation including any PCC (whether registered or unregistered eg because below the income threshold for registration) that sponsors or approves, in its own name, work with children or vulnerable adults will be seen as conducting work with those groups. Accordingly the trustees (which includes all PCC members whether elected, co-opted or ex officio like churchwardens) of such a charity will be eligible for enhanced criminal record checks.

iii) In the Church of England context this means that all PCC members, Cathedral Chapters, trustees of religious communities or other church-related charities working with these groups are eligible for a DBS check.

iv) With this in mind we recommend that:

a) Churchwardens should always have a DBS check as they have pastoral responsibilities to all members of the congregation and are also officers of the Bishop

b) The incumbent and any curates, Readers or licensed lay staff will automatically be DBS checked because of their role; they don’t need a separate check as trustees.

c) The safeguarding/child protection officer should always have a DBS check because of their specific role, whether or not they are also a PCC member and therefore trustee of the parish.
d) Just because all PCC members are eligible for a DBS check does not necessarily mean that they must be DBS checked; as a minimum it is recommended that at least three (two wardens and the safeguarding officer) be checked.

e) The Chair (Incumbent), wardens and safeguarding officer should then consider which other PCC members have (i) particular connections or responsibility as trustees for work that that requires safeguarding checks (ii) particular expertise involved in safeguarding matters, that would make them particularly appropriate to be checked.

Examples:

i) A Church has a regular Sunday club for children during the Sunday service; DBS checks are therefore needed and the process set out above in (iv) (d) and (e) should be followed.

ii) A Church has a regular Home Communion visiting scheme which is overseen by the Incumbent but in which members of the congregation also regularly visit; the home visitors need to be DBS checked if they are on their own with those visited; the PCC sponsors the scheme and therefore DBS checks are needed for the PCC – again within the parameters set out in (iv) (d) and (e) above.

iii) A church lets its hall to a nursery on a weekly basis but has no other children’s clubs or schemes for vulnerable adults; the nursery is run in the name of the nursery not the church. The PCC does not therefore sponsor or run the nursery so PCC members do not have to be checked.

*It must also be remembered that DBS checks are not the only test for whether someone is fit to serve on the PCC*

*The word ‘eligible’ is used by the Charity Commission to describe those volunteers who are in positions which the Charity Commission considers to merit DBS checking (and who can therefore be DBS checked without any fee). If someone is not eligible under this definition and a check is nevertheless desired there are other routes to obtain one – eg via DBS Scotland – provided that a fee is paid.*

Diocesan Safeguarding Team
July 2017